

When Gambling Tradition Is Old, but the Regulations Are Still Raw

Revisiting the Responsible Gambling Code of the Philippines for Better Consumer Consumption and Protection

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Abstract

In the Philippines, the Responsible Gaming: Code of Practice sets the minimum standards all licensed gaming venues must follow. The Code guidelines are referenced in regulatory manuals for legal gambling venues. All gambling venues differ significantly in size and operations; therefore, a more comprehensive and inclusive Code is essential. The current Code (Version 6.0) was released in 2021 and is claimed to be based on the world's best practices. However, ongoing changes in the gaming landscape, like the surge of electronic and online games, the rise and fall of offshore gaming, and increasing international casino resort investments, make a review and evaluation of the Code necessary. This article contributes to evaluating the Code's readiness for implementation and recommends improvements based on a comparative text analysis of Versions 3.0 (2014), 4.0 (2015), 5.0 (2017), and 6.0 (2021). The analysis focused on the 13 major sections, two minor sections (Foreword and Annexes), and the National Database of Restricted Persons (NDRP). Findings identify the gap of no changes in five major sections: Financial Transactions, Fair Gaming Experience, Awareness Programs, Training and Management of Staff, and Support Facilities, as well as the Foreword, which were last updated in 2014. This is concerning as these are important components of RG implementation, and the delays in the updates may be construed as deliberate regulatory inaction. Meanwhile, other sections of the code were minimally updated across different versions, and many of

the updates still focus primarily on casinos, while smaller gambling venues like bingo halls were not explicitly addressed, even though codes in other countries have long addressed them. This narrow focus raises concerns about the Code's inclusivity and effectiveness in protecting the public from gambling-related harms. The 2021 version of the Code shows progress, but the absence of updates in key areas undermines PAGCOR's stated commitment to regular review and evaluation. This article calls for action and provides actionable recommendations for enhancing the upcoming versions to cover all legal gambling forms, update outdated sections, and strengthen its role in protecting individuals from gambling harm, addressing social sustainability.

Keywords: responsible, gambling, Code of Practice, social responsibility, harm, PAGCOR

Introduction

Gambling activities in the Philippines are considered an old tradition and part of Filipino culture; they are often associated with wakes of the dead to keep people around to mourn (De Castro and Francisco 2015). While not all gambling activities are legal in the country, casinos are among the largest operators. Some perspectives view gambling as widely accepted as a form of entertainment despite being viewed as immoral, with various motivations influencing different individuals who engage in gambling.

In both regulated and unregulated environments, if gambling is done in excess, it may lead to gambling-related harms or adverse effects on the individual and the individual's family. Excessive gambling is highly associated with gambling addiction, which could lead to personal and social issues. These problems can include anxiety, depression, and thoughts of suicide. Social issues, on the other hand, include trouble with friends or family, legal problems, difficulties at school or work, and money issues (Delffabro and King 2019). Moreover, the culture of gambling (whether legal or illegal) is seen to erode the moral values of the people (Capalla 2005), a significant concern of the church stakeholders. Lately, deep concerns have arisen about the related harms of online gambling and the integration of financial intermediaries to increase access (Salcedo 2025). Further, ethical concerns arise as government entities support gambling through gambling-related investments, which is alarming, indicating a lack of stricter governance (Ombay 2025).

However, whose responsibility is it to stop and reduce excessive and unregulated gambling? Is it the individual players or gamblers, the government, the gambling operators, or the community? When frequent gambling turns into addiction and social and personal issues arise, who takes accountability? Is there any help available if the players seek help? Is there a way to stop this? These are commonly asked questions not only here in the Philippines but also in worldwide discussions.

Firstly, one would raise that the choice of engaging in gambling activities ultimately rests on the individual or gambler. Gamblers are given the ultimate choice of their form of entertainment; however, they should also be able to be adequately informed of the consequences of their options (Błaszczynski et al. 2004). Increasing individuals' awareness of the various effects of gambling, even before engaging in such activities, is encouraged.

Secondly, the government is involved in gambling activities in two ways: it generates revenue from gambling and has an interest in the harm gambling causes to its citizens (Smith and Wyne 2000). The government also has a substantial impact on gambling activities; it mandates laws and regulations in both legal and illegal forms, and regulatory boards and law enforcement agencies enforce these.

Thirdly, one would point to the availability and accessibility of gambling venues as a culprit in increasing gambling participation. The statement “Build it, and they will come” has been a standard description of the phenomenon, wherein the establishment of venues attracts gamblers, making it easier for marketing in terms of customer acquisition. It is even found that people living near gambling venues are more vulnerable and likely to participate in gambling (Badji et al. 2023). Hence, gambling operators and venues such as casinos should share the responsibility for gambling-related harm. Conversely, citizen groups raised their concerns about gambling activities and venues. Community stakeholders, including the church, play roles in combating the industry and illegal and legal gambling activities, focusing on increasing social problems and criminal acts as effects of gambling. Additionally, they continue to remind the community to limit participation in gambling.

In a regulated environment, gambling-related harm can be minimized through rules and policies that guide operators to promote responsible gambling. When these regulations are enforced effectively, they may help prevent harm and ensure safer gambling practices for individuals who continue to gamble. These rules and policies are typically overseen and enforced by designated gambling regulators. The central body is the Philippine Amusement Gaming

Corporation (PAGCOR), which licenses and regulates many casino and online gaming operators and implements responsible gambling standards.

Relevant stakeholders should aim to focus on the social sustainability aspects of gambling activities even though they generate revenue for the country. In line with the mission of Responsible Gaming: Code of Practice to regularly review and evaluate, there is a need to review its 2021 version to ensure the Code truly reflects the “best global practices” it claims to follow. This is not only timely but necessary to safeguard the integrity of responsible gambling in the Philippines and keep up with new challenges in the gaming industry. Such a vital code should be comprehensive and holistic to consider changes in gambling trends, landscapes, and gambling forms. The review should focus on enhancing practical implementation and responsibility procedures to moderate gambling-related harm effectively. Without this, the Code risks falling behind industry advancements and losing its relevance in protecting vulnerable individuals, society, and the industry.

Stagnation in the Code’s updates may be seen as a symptom of regulatory capture rather than simply a matter of delayed revision. Regulatory capture is a process in which government interventions are influenced by powerful special interests or in which monopolies come to control the government agencies intended to regulate them (Dal Bo 2006). In Stigler’s (1971, 3) seminal work on the theory of economic regulation, his thesis is that “regulation is acquired by the industry and is designed and operated primarily for its benefit.” In the same paper, he presented another view on the regulation of industry as a “protection and benefit of the public at large” (3). While PAGCOR regulates responsible gambling, it is worth noting that it also operates gaming facilities, indicating a dual role in the industry. This could mean that the absence of substantial updates to the Code not only reflects regulatory inactivity but may be interpreted as regulatory capture, insofar as it may serve PAGCOR’s operational interest by avoiding stricter responsible gambling obligations that would primarily benefit the gambling public.

Consequently, the objective of this article is to provide actionable recommendations to enhance the upcoming version of Responsible Gaming: Code of Practice, which is referred to in all licensed gaming venues’ regulatory manuals and implemented by gaming operators. This article starts by analyzing the last four versions of the Code to determine changes and identify gaps arising from these changes, providing recommendations for the next version of the Code through alternative actions PAGCOR should take, and encouraging policy decision-makers and relevant stakeholders to contribute to better and improved RG regulations.

Responsible Gambling (RG)

Responsible gambling (RG) or gaming has become standard practice in the gambling sector and is usually overseen, mandated, and regulated by designated regulatory boards in every jurisdiction. RG is a prevention initiative, strategy, and policy that may guide the government, industry, and individuals in gambling operations and activities (Błaszczynski et al. 2011). The concept of RG is critical in promoting gambling awareness among individuals of the adverse effects of gambling. It helps customers to be more accountable in their decisions and behaviors. In a regulated environment, gambling-related harm can be minimized through rules and policies that guide operators to promote responsible gambling. When these regulations are implemented effectively, they help prevent harm and ensure a safer environment and gambling practices. Additionally, RG policies serve as a framework for balancing economic gains with social responsibility.

RG programs are seen from the perspective of industry stakeholders who provide initiatives to protect their customers. It has become a corporate responsibility and a duty of care to its customers, and a social responsibility, to prevent and minimize problem-related harm and risks. Contemporary academic research suggested five strategies on RG: self-exclusion, behavioral characteristics, setting gambling limits, specific RG features, and staff responding to patrons (Ladouceur et al. 2017). Firstly, self-exclusion programs allow gamblers to exclude themselves from gambling establishments voluntarily; this program shows a positive effect; however, effectiveness is questioned as there is low use, and some gamblers are breaking self-exclusion agreements.

Secondly, behavioral characteristics refer to the strategy of tracking and detecting problem gamblers. The behavior of problem gamblers can be assessed based on gambling frequency, gambling spending, and duration of stay in the establishment. Although high levels of these behaviors may not be ultimately linked to being a problem gambler, these behaviors may be considered signs of excessive gambling and may lead to pathological gambling. Such behaviors may easily be tracked by online gambling; however, for land-based establishments, it is more challenging to determine. Having to track behavior easily could lead to early intervention and help.

Thirdly, setting gambling limits encourages gamblers to set precommitments to time and monetary limits before playing the game. Specific RG features, on the other hand, use different mechanisms to remind customers of responsible play; these features include money or amount spent on display and a clock for time in machines to remind customers of their money spent and time played.

Pop-up messages on machines also help remind guests of their play behavior. This strategy is linked to improving the game design regulations (Blaszczynski et al. 2011; Ladouceur et al. 2017; Livingstone and Rintoul 2020). Lastly, staff responding to patrons include participation in responsible gambling. Staff are aware of and trained in responsible gambling policies, can recognize signs of problem gambling, and support and help individuals who are in need.

Further to this, ideal responsible gambling programs should also include gambling education and awareness programs, evaluation and monitoring of the program, and different treatment and support access for individuals' segments (Blaszczynski et al. 2004; Blaszczynski et al. 2011; Ladouceur et al. 2017; Livingstone and Rintoul 2020). With education and awareness, this should include information on gambling risks, potential harms, and information that focuses on the young and vulnerable. Consumer protection is a common RG strategy where gambling activities are restricted to minors, depending on the age restriction per country, and high-risk groups, providing exclusion programs for individuals (Blaszczynski et al. 2004; Blaszczynski et al. 2011).

Blaszczynski et al. (2011) further suggested that to prevent gambling harm, RG strategies should include the establishment's environmental control and evaluation, wherein the gambling establishments and venue designs should not encourage gambling impulsively. To control the environment, a strategy may include removing or limiting ATMs in the establishments. Additionally, the proximity of gaming establishments to communities documented in the literature as being at elevated risk of gambling-related harm, including but not limited to low-income communities (Raybould et al. 2021). This may be assessed to examine whether the availability of such establishments influences and may encourage impulsive play.

In this article, vulnerability to gambling harm is understood as influenced by several factors such as addiction histories, high exposure to the gambling product and marketing, limited access to counseling and financial support services, and cultural, social, psychological, and biological influences (Hilbrecht et al. 2020). This understanding aligns with public health approaches, which emphasize the social and spatial distribution of harm and the cumulative impact of repeated exposure to gambling on at-risk groups (Badji et al. 2023; Livingstone and Rintoul 2020). Socioeconomic status influence, while linked to gambling-related harm, should not be determined as a standalone predictor of vulnerability (Raybould et al. 2021).

From a public health perspective, Livingstone and Rintoul (2020) suggested that the RG programs should move on to public health programs. The authors

argue that the public health approach focuses on preventing individuals from having gambling addiction at the onset and provides help strategies for those who have developed an addiction. With the public-health approach, programs should include a combination of assessment of areas of social environments, characteristics of games, and the marketing and advertising of gambling activities.

While earlier scholars such as Blaszczynski et al. (2011) and Livingstone and Rintoul (2020) identify what RG provisions should substantially contain, comparatively, there is less attention to how such codes evolve or fail to evolve once released or adopted. Hilbrecht et al.'s (2020) revised conceptual framework of harmful gambling also emphasizes individual-, family-, and community-level risk factors; however, it is limited in its discussion and examination of regulatory-environment factors that shape how protective measures are implemented and updated. This article addresses this gap by tracing four successive iterations of the Philippine RG Code of Practice to examine the pace, scope, and institutional context of regulatory change itself, rather than the content of RG provisions alone.

Philippine Gaming Landscape

Philippine Gambling Legal Landscape

Gambling in the Philippines is bounded by several government laws and policies with the aim of regulating these activities. Establishing a regulated gambling environment and industry makes it safer and more accountable. Presidential Decree (PD) No. 1067-A (1977) gave way to the creation of PAGCOR and defined its functions. Furthermore, PD No. 1067-B (1977) granted PAGCOR a franchise to establish and operate casinos in Philippine land and waters. In 1983, PD No. 1869 (also known as the PAGCOR Charter) was signed. It gave way for the authority to operate and regulate casinos and other gambling activities. Republic Act No. (RA) 9487 (2007) amended PD No. 1869 to extend PACOGR's terms to additional 25 years. With this, the government ensures there is a single, centralized agency managing all gambling operations in the Philippines (PAGCOR 2023). Table 1 presents a list of gambling laws and regulations in the Philippines.

Table 1. Gambling Laws and Regulations in the Philippines

Legal Instrument/ Policy	Date Signed	Main Content	Main Purpose	Implication on Gambling Activities	Source
Presidential Decree No. 1067-A	1977	Creation of PAGCOR	Centralize and regulate gambling under government control	To bring all forms of legal gambling under the control of a single government entity	GOVPH Official Gazette (n.d.)
Presidential Decree No. 1067-B	1977				
Presidential Decree No. 1399	1978	Granting of PAGCOR franchise			
Presidential Decree No. 1869	1979	Amendment to 1067-A and B in terms of expanding PAGCOR’s tax exemptions			
Presidential Decree No. 1632	1983				
Presidential Decree No. 1993	1985	Series of further amendments			
Presidential Decree No. 1602	1978	Defines illegal gambling activities and imposes penalties	Imposing harsher penalties for illegal gambling activities.	Strengthen law enforcement efforts to combat unregulated gambling operations.	GOVPH Official Gazette (n.d.)
Presidential Decree 1869	1983	Establishes PAGCOR as the primary gambling authority	Consolidates gambling regulation	Grants exclusive licensing and regulatory power to PAGCOR; enables state control over legal gambling	Integrated Corporate Reporting System (2020)

Legal Instrument/ Policy	Date Signed	Main Content	Main Purpose	Implication on Gambling Activities	Source
Republic Act No. 9487	2007	Renews PAGCOR's franchise for additional 25 years and broadens its operational authority	Expands PAGCOR's oversight and revenue-generation role	Enhances institutional reach of PAGCOR into casino, hotel, and entertainment projects	Tuazon (2020)
Malacañang Memorandum Circular No. 20, s, 1986	1986	Bans government officials, members of the PNP and AFP, and persons under 21 or currently enrolled students from entering casinos	Strict enforcement of P.D. No. 1067-B granting PAGCOR authority to operate gambling casinos Prohibit government employees from engaging in gambling activities	Provides guidelines on who can access gambling in casinos. Reinforces physical access control at gambling venues; limits exposure to gambling	GOVPH Official Gazette (n.d.)
Malacañang Memorandum Circular No. 8, s, 2001	2001				
Malacañang Memorandum Circular No 6, s, 2016	2016				
Executive Order No. 13	2017	Clarifies who regulates online and offshore gaming like POGOs	Clarifies who regulates online and offshore gaming like POGOs	Creates opportunity for licensed online gaming operations but exposes gaps in monitoring of foreign-based gambling	The LawPhil Project (n.d.)
Republic Act No. 10927 (AMLA Amendment)	2017	Brings casinos under Anti-Money Laundering obligations	Enhances financial transparency in gambling-related transactions	Requires casinos to report large transactions; helps reduce illegal fund flows	Anti-Money Laundering Council (n.d.)

Legal Instrument/ Policy	Date Signed	Main Content	Main Purpose	Implication on Gambling Activities	Source
Series of Responsible Gaming Code of Practice; Latest code v6.0	2021	Offers operational guidelines for ethical and responsible gambling practices	Updated v5.0. Standardizes responsible gaming across licensed operators	Promotes staff training, player support, helpline visibility, and referral systems	PAGCOR (2021)
Executive Order (EO) No. 74	2024	Prohibits all POGO operations nationwide due to rising criminality	Strengthens national security and public order	Stops offshore gambling; impacts revenues but aims to protect national image and safety	Presidential Communications Office (n.d.)

Note: Compiled by the author from several cited sources

The table of gambling laws and policies illustrates the Philippine government’s ongoing attempt to balance economic opportunity and social responsibility. Early decrees like PD No. 1869 laid the groundwork for centralized control via PAGCOR, while RA No. 9487 expanded its commercial scope. Complementary regulations such as the Anti–Money Laundering Act (AMLA) amendment (RA No. 10927, 2017) provide vital financial safeguards, ensuring that gambling activities adhere to international transparency standards. However, evolving technologies and regional crime concerns led to EO No. 13 (2017) and EO No. 74 (2024), demonstrating a pivot from enabling economic expansion to prioritizing law enforcement and national security. PAGCOR’s internal manuals and codes further demonstrate its commitment to responsible gambling, protecting consumers, and mitigating addiction-related harm through exclusion policies and operational best practices (2023). Consequently, as gambling evolves, especially through mobile apps and remote betting, the laws must also evolve. Future updates may be needed to address emerging risks in digital gambling and ensure continued alignment with international best practices (Gainsbury et al. 2014).

Philippine Amusement Gaming Corporation Revenue

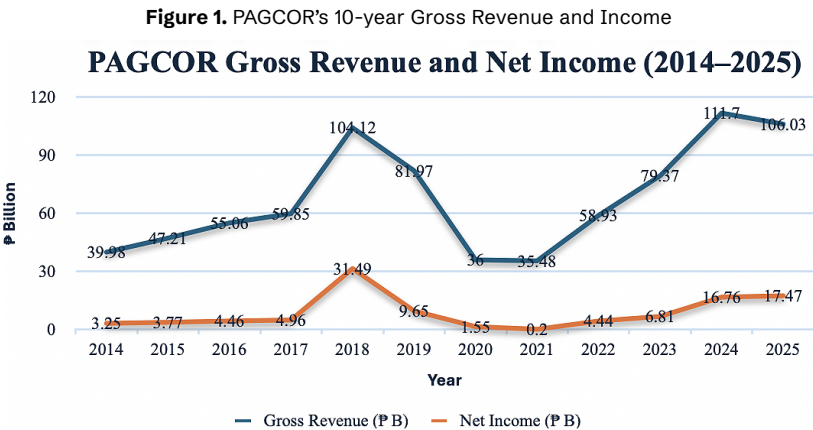
PAGCOR is the country's leading and only regulatory board for gambling activities, and one of the highest-earning government corporations. In 2024 alone, PAGCOR reported earning overall ₱112 billion in revenues, about ₱97.52 billion from gaming operations and ₱14.18 billion from business income and service fees. Under gaming operations, ₱33.07 billion came from licensed casinos and ₱12.67 billion from Casino Filipino venues (PAGCOR 2025c). Two other gaming operations include offshore gaming operations (₱2.99 billion) and electronic bingo/electronic games (online casino)/Bingo grantees (₱48.79 billion). PAGCOR claims that of this income, ₱68.20 billion is remitted back to the government for nation-building and is then distributed to the different sectors of the government to use in various nation-building service projects. See Table 2 for the reported revenue of PAGCOR.

Table 2. Reported revenue of PAGCOR over the years

Year	Gross Revenue (P)	Net Income (P)	Notes
2014	39.98 B	3.25 B	Source: Commission on Audit (2015)
2015	47.21 B	3.77 B	Source: PAGCOR (2016)
2016	55.06 B	4.46 B	Source: Commission on Audit (2017)
2017	60.15 B	4.96 B	Source: Commission on Audit (2018)
2018	104.12 B	31.49 B	Income from gaming operations and the sale of PAGCOR's land to Bloomberry Resorts Corporation Source: Commission on Audit (2019)
2019	81.97 B	9.65 B	Source: Commission on Audit (2020)
2020	36.00 B	1.55 B	COVID-19 pandemic impact Source: Commission on Audit (2021)
2021	35.48 B	0.20 B	Lowest Net Income – Continued pandemic effect Source: Commission on Audit (2022)
2022	58.93 B	4.44 B	Partial recovery post-pandemic Source: Commission on Audit (2023)
2023	79.37 B	6.81 B	Source: Commission on Audit (2024)

Year	Gross Revenue (P)	Net Income (P)	Notes
2024	111.7 B	16.76 B	Pre-POGO ban recovery and growth Source: Commission on Audit (2025)
2025	106.03 B	17.47 B	Land-based casinos' earnings declined. No more earnings from offshore gaming Source: PAGCOR (2026)

Note: Compiled by the Author from several cited sources



Based on Figure 1, PAGCOR’s revenue performance highlights significant fluctuations and remarkable recovery trends over the last decade. Revenues peaked in 2018 at approximately ₱104.12 billion before declining to ₱81.97 billion in 2019. The COVID-19 pandemic severely affected PAGCOR’s operations, with gross revenues dropping to ₱35.48 billion in 2021, accompanied by 203 million in net income, reflecting extended venue closures and reduced activity. However, the 2022 to 2023 period saw a strong post-pandemic rebound, with gross revenue climbing to ₱79.38 billion and net income rising to ₱6.81 billion. In 2024, PAGCOR’s revenue achieved its highest peak. The electronic or digital gaming formats and Bingo games have become the dominant revenue drivers. This implies several regulatory implications for the future policy, which must prioritize the expanding e-games and e-bingo sector, ensuring responsible gaming frameworks keep pace with technological growth. Additionally, PAGCOR’s financial health now allows it to significantly fund social and nation-building programs, reinforcing its role as a key contributor to public welfare.

Recently, the issuance of EO No. 74 in 2024 banned Philippine offshore gaming operators (POGOs), and their licenses have been cancelled. This has affected the latest revenues for PAGCOR, with 2025 revenues down by 5 percent from 2025. Further, the PAGCOR’s chairman, Mr. Alejandro H. Tengco, cites changes in consumer behavior towards digital and online gaming platforms as one of the reasons for the decline of land-based casino revenues (PAGCOR 2026).

Registered Gambling Venues

In the country, casinos are one of the largest operators of legal gambling activities. Casinos offer two primary types of games: table games (games played on a table) and electronic gaming machines (games played on a mechanical or electronic device). Two types of casinos are presently regulated: the PAGCOR-owned/operated casinos and the licensed casinos. PAGCOR currently owns Casino Filipino (a casino chain) with 43 casinos and satellite sites in the Philippines (as of July 2026), some of which are co-operated with several hotels and resorts. Licensed casinos in the country are owned by both multinational corporations and some Filipino corporations; there are currently 12 licensed casinos in the country. They are usually large and operate as integrated casino resorts or multi-service resorts, with various tourism and hospitality services, including multiple accommodations, casual to fine dine-in restaurants, bars, entertainment, and event venues such as convention centers, parks, theatres, shopping malls, and unique entertainment services. Other legal gaming operations in the Philippines include games such as traditional bingo games, electronic bingo (eBingo) games, electronic (eCasino) games, sports betting, specialty games, online poker games, numeric games, and poker clubs. See Table 3 for the number of registered gaming facilities in the country.

Table 3. Number of Registered Gaming Facilities in the Philippines

Facility Type	Number	Source	Short Summary
Casino Filipino Branches and Satellites (PAGCOR-owned)	43 branches and sites	Casino Filipino (2024)	State-operated casinos in major cities offering table games and slot machines. Satellites are smaller venues located in hotels and commercial centers outside Metro Manila.
Integrated Resort Casinos/Land-Based Casinos	12 resorts	PAGCOR (2025a)	Privately run, large-scale casinos part of entertainment and hotel complexes.

Facility Type	Number	Source	Short Summary
Licensed Gaming Venue Operators	283	PAGCOR (2025b)	Licensed land-based gaming venues offering single or multiple game offerings such as traditional bingo games, electronic bingo, electronic casino games, sports betting, specialty games, numeric games, and online poker games.

Notes: POGO sites were not included here due to being banned as per EO No. 74.
Compiled by the author from several cited sources

People see casinos as places for gambling, while others see them as attractions that promote tourist destinations. For example, PAGCOR-operated and licensed casinos are strategically located in popular tourist areas like the National Capital Region (NCR), Clark, Cebu, and Davao. The spatial concentration of these resorts in urban or economic zones has increased foreign investments and tourism receipts but also intensified regional socioeconomic disparities (Livingstone and Rintoul 2020). From a business and economic viewpoint, casinos are seen positively, which is why they get support from the government and investors to build more of them in the country. However, many people who focus on social and mental health issues disapprove of casinos because of the nature of gambling activities.

Meanwhile, the proliferation of electronic gaming machines, bingo outlets, and online gambling has made access to gambling easier. However, scholars warn that high accessibility correlates with increased problem gambling prevalence, especially among populations already at elevated risk due to compounding factors (Gainsbury et al. 2014; Hilbrecht et al. 2020; Kim et al. 2022). Many of these smaller-scale outlets operate in lower-income communities, raising ethical and regulatory concerns about their contribution to gambling-related harm. As noted by Gainsbury et al. (2014), countries with rapid gambling expansion often struggle with establishing effective harm minimization frameworks. The Philippines illustrates this clearly; while institutional frameworks exist under PAGCOR, the diversity of venues (e.g., mall-based bingo, online e-games, luxury casinos) demands a differentiated policy response. Additionally, online gambling access using digital payment platforms has been in abundance. Stronger financial interventions can be in place to curb gambling-related harm. For instance, the Bangko Sentral ng Pilipinas (BSP) gave a directive on 14 August 2025 mandating all mobile wallets and financial mobile applications to omit gambling access within 48 hours (Salcedo 2025). In compliance, GCash, a leading electronic wallet,

suspended and removed all its in-app links and icons directing users to online gambling platforms via its GLife feature by 8 p.m. on 16 August 2024. This response reflects how financial regulations may help mitigate gambling activity harms.

In the likes of high-risk industries like the gaming sector, the Securities and Exchange Commission (SEC) plays a vital role in enhancing the integrity and transparency of the sector. Although PAGCOR holds exclusive licensing authority for gambling operations, the SEC has the supporting role of overseeing the corporate validity and legal compliance of the registered gaming venues. Among the SEC's functions is overseeing corporate registration and supervision of gaming entities. This means all gaming entities are required to register with the SEC. The SEC also enforces the Revised Corporation Code of the Philippines (RA No. 11232) on entities violating the Code; for instance, the SEC has revoked Lucky South 99 Corporation for illegally operating a POGO without proper authorization (Loyola 2024a).

Regulatory oversight failures involved such as a lack of SEC registration and fiduciary lapses, may necessitate stricter governance. Recently, Senator Risa Hontiveros revealed in her privilege speech on 5 August 2025 that the Government Service Insurance System (GSIS) invested approximately ₱1 billion of its members' savings in the online gambling platform DigiPlus. GSIS acquired shares at a high of ₱65.30, which later plummeted to ₱13.68, thus raising concerns over reckless and ethically problematic investment of public funds (Ombay 2025). Moreover, Hontiveros highlighted that these shares were apparently not registered with the SEC at the time of purchase, prompting warnings from the Commission on Audit that such risky investments could endanger the actuarial life of the GSIS pension fund. As such, regulations need clear prohibitions against government entities being involved in gambling ventures.

In 2023, the SEC formalized a data-sharing agreement (DSA) with key regulatory bodies, including PAGCOR, the Bureau of Internal Revenue (BIR), and the Philippine National Police (PNP) (Loyola 2024b). This agreement enables PAGCOR to access the beneficial ownership information of registered corporations and provides a mechanism for improved regulatory due diligence and compliance checking within the gaming sector. The move toward interagency collaboration is rooted in the SEC's broader effort to comply with the Financial Action Task Force (FATF) recommendations, particularly on corporate transparency and anti-money laundering obligations. Through a series of Memorandum Circulars (MCs), such as the SEC MC No. 10, s. 2022, the SEC has expanded reporting requirements for

beneficial ownership, enhanced disclosure protocols, and increased penalties for misrepresentation. These circulars empower the SEC to track the true owners of corporations and prevent their misuse as fronts for illicit activity (SEC 2022).

For PAGCOR, the ability to access and verify BO data is critical in implementing its Internet Gaming Licensing Regulations (IGLR). These regulations require that licensees disclose their ultimate beneficial owners, undergo probity checks, and maintain corporate legitimacy. With the SEC's registry data, PAGCOR can now conduct more rigorous background checks and monitor ownership changes among licensees and suppliers, especially those linked to offshore gaming operations. This has direct implications for licensing, renewal, suspension, and exclusion decisions, helping PAGCOR uphold transparency and integrity in the gambling industry (Quigue et al, 2025).

The regulatory responsibility for digital channels is presently distributed across multiple agencies rather than consolidated under a single RG framework. This creates cross-agency coordination challenges, which are documented internationally. A scoping review of legal and regulatory responses to online gambling harms found that some jurisdictions frequently struggle with cross-border enforcement, inconsistent payment mechanisms, and uneven verification standards because no single regulator holds authority over online channels (Fisher et al. 2025). In the Philippines, this is currently reflected in ad hoc directives from separate agencies as online gambling concerns arise. PAGCOR Chairman and Chief Executive Officer (CEO) Alejandro H. Tengco has acknowledged the need to regulate online gaming products (PAGCOR 2026).

PAGCOR's Dual Mandate: Regulator and Operator

PAGCOR's vision statement focuses on "becoming the leading gaming authority in the Asia-Pacific region that is innovative, proactive, and socially responsible" by 2028 (PAGCOR, n.d.). Chairman Tengco has expressed his vision of the organization becoming a pure regulator by 2028. This will happen after PAGCOR sells its casinos after the privatization process (Scott and Blaschke 2023). In preparation, the corporation is pushing for new reforms such as updating suppliers' regulatory manuals, a showroom for suppliers, rules and guidelines for licenses, employment licenses, IT Systems, and upgrading human resources training; restructuring of the organization, a regulatory framework for online poker operations, a junket licensing regulatory manual, and technical standards for electronic gaming machines

are among others that PAGCOR is completing in preparation to meet its vision (Cecilio 2023).

Currently, PAGCOR's dual function raises concerns about a conflict of interest, in which PAGCOR's actions may be influenced by its commercial interests rather than guided by the public interest. Philippine policymakers, and even the concurring opinion of the Supreme Court, have characterized PAGCOR's dual role as exhibiting features of regulatory capture (*Genuino v. Commission on Audit* 2023). Justice Leonen's concurring opinion underscores the need for an audit of PAGCOR. The Department of Finance has repeatedly urged PAGCOR to relinquish its operating functions on conflict-of-interest grounds (AGB 2023), a position PAGCOR's own chairman has since publicly acknowledged, remarking that "a referee cannot also be a player on the same field" (Cordero 2024). Taken together, this supports the argument that the Code, which is a regulatory framework, requires a thorough and critical review to realign it with its intended public-protective function. Therefore, the structural tensions may help explain the Code's limited revision over time.

Despite its commitment to revenue generation and industry regulation, PAGCOR's vision lacks a strong emphasis on community welfare, raising concerns about whether RG policies will remain a priority in the coming years. The strategic shift raises questions about the future of RG and the role of PAGCOR in balancing economic growth with public welfare through RG initiatives. Thus, it is imperative to review and strengthen the Responsible Gambling Code to ensure that it continues to effectively mitigate gambling-related harm while maintaining public trust in the regulatory system.

The Responsible Code of Practice

Through PAGCOR's Gaming Licensing and Development Department (GLDD), it released the Responsible Gaming Code of Practice as part of the regulatory framework. The latest version of the Code is Version 6.0, which was released in 2021. It contains 61 pages and includes 13 significant sections covering the Definition of Terms, Probity Measure, Limited Access, Financial Transactions, Fair Gaming Experience, Awareness Program, Advertisements, Facilities, Training of Management and Staff, Support Facilities, Exclusion Program, Table of Penalties, and Help Centers in the Philippines. While these sections provide a broad framework, covering the first 29 pages of the Code, the remaining pages consist mainly of annexed forms.

The Code is an important regulatory guide for licensed gaming venues in terms of RG guidelines. Regulatory manuals of casinos and other licensed

gaming venues, such as establishments that offer traditional bingo games, poker games, and electronic games, refer to the current code for RG practices and guidelines. Each regulatory manual has a section that promotes the practice of RG for these establishments, and it references the Code.

The Code, in its foreword, aims to guide “all PAGCOR-operated and licensed entities in authorized gaming establishments” delivering their services responsibly (PAGCOR 2021, 5). Herein, it is assumed that the Code is to guide all casinos (PAGCOR-owned and Licensed casinos) and other licensed gaming venues. The foreword also states, “the rules, defined herein, are based on present best global practices.” Moreover, the foreword further acknowledges that the gaming landscape is continuously evolving, as stated, “the continued evolution and changes in gaming research, technology, and business practices, the code is subject to regular review and evaluation” (5).

While the changing gaming landscape is acknowledged, it is unknown if the Code has addressed these and if its provisions are based on the best global practices. Changes in the evolving gaming scene in the Philippines have included the offering of online casino games, offshore games, and the increased number of foreign investors in establishing new integrated casino resorts in various destinations in the country. As Chairman Tengco envisioned, there will be one new integrated resort opening every year from 2024 for the next five years (Cordero 2024). Further, there is ambiguity if the current code covers RG practices dedicated to other legal gaming operations, such as eCasino games or online casino games, sports betting, specialty games, online poker, and numeric games. These other gaming operations in venues are found to be the highest contributors of revenue for the corporation. Therefore, RG practices should also be addressed in the operations of these games.

Conceptual Framework

RG policies, which are a set of tools for managing the behavior of stakeholders involved in gambling, are embedded within the broader system of regulatory governance and institutional design. In this manuscript, the Responsible Gambling Code of Practice is a regulatory instrument that shapes how operators balance their commercial interests with consumer protection and harm minimization. RG strategies are most effective when they extend beyond establishment-level initiatives and address the social determinants of harm, including accessibility, game design, marketing, and institutional arrangements that influence regulatory priorities (Livingstone and Rintoul 2020; Gainsbury et al. 2014).

The Reno Model, a science-based RG framework, views gambling-related harms as a public health issue (Blaszczynski et al. 2004). The authors of the model present that responsible gambling rests on two main principles: (1) deciding to gamble represents a choice that the individual can make on their own, and (2) the individual must be informed for them to make sound decisions. The gambling industry is responsible for providing accurate and relevant gambling information (e.g., gambling risks). Further, responsible gambling acknowledges that the industry must not take advantage of any customer or player, and the industry should take reasonable steps to protect customers from gambling-related harms.

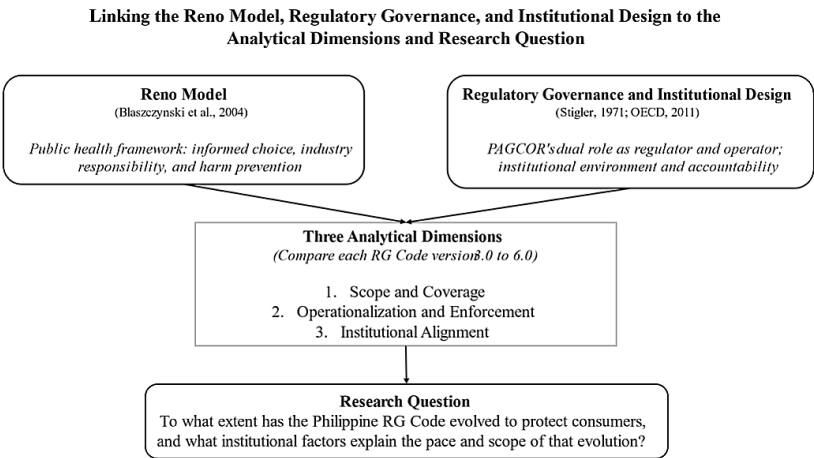
The Reno model proposes that stakeholders need to collaborate to develop responsible gambling practices using five key principles. The principles include:

1. commitment to reduce or prevent gambling-related harms from occurring;
2. informing and evaluating public policy that focuses on reducing gambling-related harms.’
3. Setting specific short- and long-term priorities and creating actions to achieve plans within a timeline;
4. the use of scientific research as a basis for public policy development and industry strategic policies; and
5. monitoring and evaluation of plans developed using scientific methods.

The Reno model also holds six assumptions: (1) that it is possible for gambling participation to be safe (meaning, there are safe levels of participation that are not necessarily at gambling-related harm risks); (2) that gambling provides certain level of benefits to individuals and the community; (3) that players and family members may also suffer from harm due to heightened gambling participation; (4) that social benefits of gambling must exceed the social costs; (5) that, while important, avoidance of gambling is not necessarily an important goal for individuals already experiencing gambling-related harm; and (6) that for such individuals, returning to safe level of participation on gambling activities is a more attainable goal. Further development of the model emphasizes informed choice, pre-commitment, and structured safeguards around gambling environments (Blaszczynski et al. 2004; Blaszczynski et al. 2011; Ladouceur et al. 2017).

Stigler (1971) views regulation as acquired by and designed for the benefit of an industry rather than for the benefit of the public, which is a pattern that regulatory literature uses to explain why regulatory instruments can remain static or narrowly scoped. This lessens the perceived credibility and trust in regulators and may affect how stakeholders view compliance and the legitimacy of rules. Institutional design scholarship identifies three elements of a credible regulator: (1) it has clear mechanisms; (2) it has to be independent and adequately sourced; and (3) it has accountability mechanisms (Regulation Body of Knowledge, n.d.; OECD 2011). With proper institutional design, customers and stakeholders have more confidence in regulators and the regulatory process, finding it credible and legitimate. PAGCOR’s position as both the regulator and a major operator of gambling activities creates advantages and constraints for perceptions of the regulatory board, including questions about regulatory independence and its current institutional design, concerns that regulatory scholars sometimes describe under the broader heading of regulatory capture. Drawing on the regulatory governance and institutional design framework, the Code is reviewed as a governance tool that requires clear rules and enforcement mechanisms and is aligned with the institutional environment in which it operates.

Figure 2. Conceptual framework



Notes: Created by the author

Guided by several frameworks, three analytical dimensions help analyze the Code. See Figure 2 for the conceptual framework of this article. First are the extensive scope and coverage, reflecting the other types of gambling venues (e.g., casinos and other gambling outlets) and gambling formats (e.g., e-games,

e-bingo). Second are operationalization and enforcement, which reviews of the Code articulate obligations, penalties, including monitoring mechanisms, and access to support. Last is institutional alignment, which assesses how the Code interacts with PAGCOR's dual role, interagency relationships, and legal developments. From both the Reno model of responsible gambling and the regulatory governance framework, the review will systematically identify the gaps in the current and previous codes. From the framework, this article asks: to what extent has the Philippines' Responsible Gaming: Code of Practice evolved to protect consumers, and what institutional factors help explain the pace and scope of that evolution?

Methodology

To address the objective of this study, which is to examine the Code of Practice and to provide actionable recommendations for the upcoming version, a comparative content analysis using the three analytical dimensions outlined above—scope and coverage, operationalizations and enforcement, and institutional alignment—was conducted. Version 6.0 (2021), Version 5.0 (2017), Version 4.0 (2015), and Version 3.0 (2014) of the Code of Practice were coded and compared to identify what changed, what remained unchanged, and how these patterns relate to the regulatory governance and institutional design considerations discussed in the conceptual framework. All four versions were downloaded. To start with the analysis, each version's section was converted into a tabular form. A table with five columns was created: column 1 refers to the Code's section, column 2 to the contents of Version 3.0, column 3 to the contents of Version 4.0, and so forth. The conversion started with Version 3.0, where all sections were copied to the rows. These were done for versions 4.0, 5.0, and 6.0 as well. In the analysis, each word and text of each version's section was compared to the succeeding versions. The latest version 6.0 was compared to version 3.0 to see the changes over the seven-year gap. All differences and changes between versions were noted. Final and overall differences and changes were recorded in an additional column. The final changes were interpreted to identify the gaps for improvement in the Code. This assessment is necessary to evaluate the overall changes of the existing responsible gambling code and to determine areas for improvement. The intention is also to provide new recommendations that will address gaps and ensure that gambling-related harm is continuously minimized. See Appendix 1 for a summary of the table and the changes from version 3.0 to version 6.0, highlighting how PAGCOR's RG policies have been updated over the years.

Findings

Overall, over the three new versions, there are a few changes made, making the comparison process simpler. For instance, five sections did not have any changes over the seven years, making recommendations based on the current content of the sections. Meanwhile, subtle changes were made in other sections, which are easily noticeable. Despite these, the comparative content analysis identified several findings. Five out of the 13 major sections of the Code—Financial Transactions, Fair Gaming Experience, Awareness Programs, Training and Management of Staff, and Support Facilities—have remained unchanged over the four versions (Version 3.0 to 6.0). Additionally, the Foreword section that contains the introduction and purpose also remained the same. The Penalties section was introduced in Version 6.0 but was absent in the earlier versions. Despite its introduction, this section only included one table outlining fines for allowing excluded individuals in the casinos. The NDRP section, which is present in all Versions, has redefined who is a “restricted person” and who are “persons for inclusion” while improving the NDRP procedures in Version 6.0.

Several major changes have been introduced from Version 4.0 to Version 6.0. The Definition of Terms section includes new terminology in Version 6.0. Probity Measures sections impose stricter regulations, such as specific timelines for submitting Personal Disclosure Statements (PDS), electronic submission requirements, and enhanced verification processes involving tax and ID documentation. An application guide has also been added. In, Limited Access section, restrictions have expanded to include additional groups, such as individuals under the NDRP, financiers, and loan sharks. The penalties section has introduced penalties for GEL holders who fail to comply. The Advertisement section now mandates closing tags for certain advertisements and enforces stricter rules on billboard placement.

Other changes include updates to the Facilities section, requiring dedicated RG helpdesks and kiosks in casinos. In the Exclusion Programs section, amendments have been made to exclusion periods, including the removal of lifetime self-exclusion, allowing amendments to exclusion periods, and extending licensee-initiated exclusions from one year to a lifetime ban. In the Help Centers in the Philippines section, the number of listed centers has been reduced from four in the previous version to two in Version 6.0. Finally, Version 6.0 includes additional Annexes, introducing new RG forms such as the Petition to Amend Exclusion, Compliance Report, and Notice of Non-Compliance. Additionally, process flowcharts have been added to improve compliance tracking.

Major Gaps in the Changes from Version 3.0 to Version 6.0

Upon closer examination of the Code, significant gaps were found. Firstly, the lack of changes in the five key sections over four versions presented the biggest gap in the Code. The seven-year difference and the major changes in the gaming landscape were not considered during the revisions up to the release of Version 6.0. The “no changes” does not reflect the Code’s foreword claims.

While no changes could likely happen in codes or regulatory manuals, the analysis further probes into the content of each “no change” section to justify the lack of changes. A closer analysis found that these sections contain only basic and general statements. For instance, the Financial Transactions section covers the Anti-Money Laundering Act, credit, and commercial banking access, but does not provide further details on implementation. The Fair Gaming Experience section states that game rules and manuals must be approved by PACGOR and that gaming machines must be certified by international laboratories, yet it lacks clarity on monitoring and compliance mechanisms for these machines. The Awareness Programs section outlines how licensees should create awareness about problem gambling among patrons, the use of standard slogans and communication media, and standard RG information that needs to be disseminated. However, Version 6.0 does not specify new approaches or innovations in RG awareness. The Training and Management of Staff section mentions that a licensee should educate its employees on problem gambling, require seminar attendance for obtaining a GEL, and ensure employees are aware of referral details on exclusion programs. There are no additional mechanisms beyond existing helplines and reporting systems under the Support Facilities section. These gaps indicate that key RG strategies, especially those related to staff responses to RG concerns and features linked to game rules and mechanics, are insufficiently addressed. Since awareness programs are also a critical component of RG strategies, the lack of enhancement in the Awareness Programs section further weakens the Code’s overall impact. For the past seven years, advances in RG strategies have been circulating, but this was not captured in Version 6.0 released in 2021.

Secondly, despite the changes in Version 4.0, 5.0, and 6.0, the latest version still lacks operationalization and sufficient guidance on how its provisions should be effectively implemented and monitored. For example, Version 6.0 mentioned penalties for the late submission of PDS in the Probity Measures section. However, there is no specific fine stated for the late submission. Additionally, while the new Penalties section introduces fines, there is no clarity on how these penalties will be enforced, nor does it outline how

PAGCOR will assess the effectiveness of penalty implementation and compliance monitoring.

Lastly, the Code appears to focus heavily on casinos and does not explicitly refer to other licensed gaming outlets. For example, in the Limited Access section, financiers or loan sharks are prohibited from roaming around casinos/gaming premises; and under the Facilities section, RG kiosk/helpdesk should be present in casinos. These statements have explicitly indicated casinos, while other gaming venues or outlets should also be covered in these provisions. This means that RG guidelines for other gaming outlets are not clearly indicated, which could benefit the understanding of the Code among other operators. This limited scope raises concerns about the Code's ability to comprehensively regulate gaming responsibly across all gaming outlets.

Discussion

From the analysis, findings, and gaps, there is a strong call for GLDD to release an updated code. Several of these gaps are intertwined with PAGCOR's institutional position being both a regulator and operator of casinos and gaming activities. Over time, PAGCOR's authority has expanded to include licensing, regulation, and operation, with its commercial scope expanding. PAGCOR's substantial revenue, while supporting nation-building and social programs, creates tension between its commercial interests and its duty to minimize gambling-related harm. This raises regulatory concerns about its independence, conflict of interest, and potential regulatory capture. In the case of a dual role, PAGCOR must act to guard against the risk of weakening its commitment to enforcing stringent responsible gambling measures, particularly when such strategies may reduce participation or restrict profits. In the current RG Code, this tension is evident in the lack of detailed operational guidance and enforcement mechanisms, the minimal use of penalties, and the limited coverage of non-casino venues and digital gambling.

While the foreword may not be a major section in the Code, the foreword presents its the purpose. There are no changes in the statement in the foreword over the four versions, despite the changes in the Code for every version. Also, the foreword statement has only encouraged all licensed gaming establishments to comply with the Code to the minimum standard but does not encourage them to go beyond these standards. One of the best practices in the Victorian Gambling and Casino Control Commission (VGCCC), Australia, is that gaming venues are encouraged to adopt their own RG code of conduct that follows the Commission's Code, and these venue codes are

submitted to the Commission for online publication, showing transparency (see Venue Code of Conduct, under <https://www.vgccc.vic.gov.au/>).

Next is probity, which is a measure for individuals who are directly and indirectly involved in operating or owning gambling establishments to undergo an investigation to determine their “fitness” or suitability to run and/or get involved in gambling services. Probity measures include the creation of moral integrity, uprightness, honest financial soundness, and business ability. Version 6.0 implied the submission of a personal disclosure statement online within the specific timelines for submission. Additionally, it indicated the possibility of a penalty for late submission; however, the penalty was not specified, and it referred to a separate regulatory manual for reference. Moreover, the latest version indicated probity measures for “suitability to serve as licensee’s board of directors.” This statement gives a vague indication that probity is only for the board of directors; instead of determining the suitability of any individual who could be involved in licensed gaming, including directors, managers and officers, employees, investors, stockholders, and corporate bondholders, etc., to be found suitable. This limited revision is consistent with weaker accountability mechanisms, one of the three institutional-design elements (Regulation Body of Knowledge, n.d.).

Under the Limited Access section, the latest version includes important changes for other restricted groups of individuals, such as NDRP, financiers, and loan sharks. Penalties for GEL holders were revised to a six-month suspension and revocation for a second offense. With these changes, it calls for a stronger monitoring system to allow the establishments to determine restricted groups. The Financial Transactions section has no changes, and there is no update on the Anti-Money Laundering (AML) subsection. In the amended AMLA (RA No. 9160) signed by President Rodrigo Duterte on 14 July 2017, casinos were included as covered persons under RA No. 9160; this is now known as RA No. 10927 (Castro 2017). This was not reflected in Version 6.0 of the Code despite the RA release in 2017.

The Fair Gaming Experience section has no changes. According to this section, game rules and manuals should be approved by PAGCOR. The lack of game rules and manuals provides limited guidance for licensed establishments. Likewise, all licensed venue games entail different gaming rules, instructions, and manuals. The individual gaming machines would have individual gaming manuals and gaming instructions, which manufacturers usually provide. While PAGCOR may not be able to identify and stipulate all game rules and manuals of each gaming offering in a venue, PAGCOR should instruct how the gaming rules and instructions should be designed for

the benefit of gaming customers. For example, the Australian/New Zealand Gaming Machine National Standard (2022) provides clear instructions for gaming equipment manufacturers on how to design gaming machines and related equipment. The standard requires all machine game instructions to be clear, easily interpreted, accurate, and inclusive designs, easy to access, and provide visual instructions. This helps players understand the rules, verify prizes, and avoid confusion or misleading information. Clear visuals and truthful statements ensure fairness and transparency, reducing the risk of customer exploitation. Under the same subsection, it is stated that gaming machines should be certified by international testing laboratories. However, there is no list provided of acceptable international testing laboratories; this should be included or referred to if a separate database is available.

The Awareness Programs section calls for licensees to create problem gambling awareness programs among their gaming customers. The latest version did not have changes in this section. The lack of changes in the Awareness Programs section shows that awareness focuses only on the use of slogans, communication media, and standard RG information in providing warnings about problem gambling. This standard information in the manual focuses only on the surface information on excessive gambling but fails to delve deeper into the negative effects on an individual. Awareness programs are one of the critical stages in a customer journey towards gambling activities. Awareness and education programs are shared ways to educate individuals about the risks of gambling. While not all gambling awareness programs stop individuals from gambling, conducting regular awareness programs helps in making informed decisions. Awareness programs should be done before an individual starts to get involved in gambling activities. For instance, during membership in casinos, signing up is a good opportunity to educate individuals on the risks of gambling. For responsible gambling, this section is critical and perhaps should be given more attention by PAGCOR, especially in providing consistent ways of raising awareness of the effects of gambling activities.

Gambling advertisements, communications, and promotions are powerful tools used by the gaming industry to market their product offerings to customers. It is therefore encouraged that it has to be conducted legally and socially responsibly (Ad Standards Council 2024). Version 6.0 had minimal changes, including adding end/closing taglines for radio advertisements, billboards, TV commercials, and print ads, and additional inclusion of racing outlets, public markets, informal settlers, and resettlement areas as part of the 200-meter radius. This is in addition to the current section content that ads must not have content and messaging that target minors, suggest skill affects outcomes, promote gambling as income, or mislead about odds and

prizes. The Ad Standards Council's Code of Ethics and Standard Manual of Procedures (2024) outlines nine specific guidelines under Article 8, Section 7 for gaming and betting advertisements, requiring prior approval for sale promotion from PAGCOR and GLDD.

For facilities, the Code states that areas on the main gaming floor, such as food outlets, could be accessible to minors; however, adults should accompany them. The Code also stated the need for additional hospitality and entertainment venues to encourage players to take a break from playing. In the training and management of the staff section, the no-change version of the Code stated that employees are required to attend seminars on RG as a prerequisite for them to attain their employee license. However, staff are an important element in providing service to individuals in licensed areas and other gambling areas; they have first contact with customers and are essential in identifying individuals who are exhibiting behaviors leading to problem gambling. Therefore, staff training should be intensive and comprehensive, covering skills in spotting individuals exhibiting gambling-related problems, reporting, and customer handling. Other training should include refresher courses, webinars, and updates to staff response protocols for handling problem gamblers, which include digital alternatives to protocols.

For the support facilities, the code encourages licensed venues to establish helplines, feedback systems, and technological solutions for problem gambling. Over the years, PAGCOR should have identified the best practices, effective technological solutions appropriate for helplines, and feedback management solutions utilized by internationally owned licensed venues. These best practices can be used as a benchmark for upcoming venues.

Exclusion programs are a key component and practice in RG, allowing individuals to be barred from venues if an individual or their family recognizes signs of gambling-related problems. This could be through self-nomination, family-nomination, or venue-nomination. Recent updates to the Code removed the lifetime self-exclusion period and introduced a formal petition to amend the self-exclusion period. The family-nominated exclusion now lasts six months, one year, or three years. Licensee-emanated exclusion can be set for one year, five years, or a lifetime. However, this does not stop individuals from engaging in other forms of gambling (Goh et al. 2016). This suggests that despite the exclusion program from a licensed venue, secluded individuals may continue to develop problem gambling in other areas.

Stigma, embarrassment, privacy, and confidentiality are barriers to self-exclusion uptake (Hing et al. 2014), including family-nominated exclusions.

In some countries like Singapore, exclusion often requires venue-specific applications, and individuals apply separately at each venue where they wish to be excluded (Goh et al. 2016). In the Philippines, all exclusion applications go through GLDD via mail, and it applies to all venues; this process limits individuals from applying to every single venue. At the same time, an off-site venue application reduces privacy and confidentiality issues (Devault-Tousignant et al. 2023). PAGCOR (2024) shows that there is a higher uptake for family exclusions than for self-exclusion. Surprisingly, licensee-emanating exclusions are fewer than 10 every year, except in 2018, when 15 licensee-emanating exclusions were recorded for the entire year, while in 2013, 2014, 2015, 2021, and 2022, there were no licensee-emanating exclusions. Exclusion programs have challenges, including low uptake, breaches of the exclusion program, limited evidence of long-term outcomes (Ladouceur et al. 2017), and low publicity (Hing et al. 2014). Currently, the self-exclusion period will be lifted immediately once it lapses. This indicates that individuals are automatically allowed to visit or play at a licensed venue, and relapse risks are high.

The Penalties section is one of the newest sections in the Code, which includes a penalty table for licensed venues that allow restricted people to enter or play, namely government officials, members of the Armed Forces of the Philippines (AFP), persons listed in the NDRP, GEL holders, and minors. Penalty includes ₱100,000.00 per entry/play per person and closure of the gaming site for allowing minors. However, the penalties apply only to gaming venues. The penalty is linked to the accountability mechanisms of an institutional design; this addition improves the institutional design of the RG Code.

Surprisingly, the latest code only lists two help centers under the Help Centers section, a reduction from the four listed centers in Version 3.0. These two centers have branches located within Quezon City, Parañaque City, and Mandaue City; PAGCOR should list help centers, rehabilitation and counselling centers, and partners, within significant areas where licensed venues are active. Over seven years, there should be more accredited help centers that PAGCOR could have identified and partnered with.

In the National Database of Restricted Persons section, Version 6.0 updates the definition of “restricted persons,” including those for inclusion in the list, and the procedure for the NDRP. It is appreciated that this manual has been updated. However, one limitation of the database is the issue of confidentiality. The Code currently addresses this by defining the list of roles of people who can access the NDRP.

Conclusion

To safeguard the integrity of responsible gaming in the Philippines for better consumption and consumer protection, and to keep up with the changing landscape in the gaming industry, a continuous approach to improving responsible gambling policies is essential. A comprehensive review, evaluation, and strategic revamp of the Responsible Gaming Code of Practice will ensure its success in mitigating gambling-related harm while aligning with PAGCOR's mission of strengthening its regulatory framework. This effort is crucial for realizing PAGCOR's 2028 vision of becoming a leading gaming authority in the Asia-Pacific region—one that is innovative, proactive, and socially responsible.

Updating the Code will yield significant benefits, including enhanced consumer protection, reduced gambling harm, and long-term industry sustainability. Strengthening RG measures will not only safeguard vulnerable individuals but also reinforce the credibility of licensed gaming venues. By integrating recommendations on the sections of the Code, adopting suggested practices, and improving enforcement and monitoring mechanisms, the Code can keep pace with industry advancements and evolving risks.

Given the urgency of addressing gambling-related challenges, PAGCOR and policymakers must take immediate action on the recommended revisions. A well-implemented and adaptive RG Code will not only protect players and communities but also solidify the Philippines' reputation as a leader in ethical and regulated gaming.

This study's comparative content analysis of the RG Code versions provides an overview of changes in content over time, but it does not directly examine how the Code's provisions are implemented, monitored, or enforced in practice. A fuller account of the Code's real-world effectiveness would benefit from other research methods, such as interviews with compliance officers, licensed operators, and affected players. These fall outside the scope of the present paper. These are recommended directions for future research, particularly the position of evaluation within a broader institutional context.

Policy Recommendations

The analysis of the current Responsible Gambling Code reveals critical gaps that hinder its effectiveness in safeguarding both customers and the integrity of gaming establishments. To address these issues, the following practical and doable recommendations for the upcoming version of the Code are provided:

- The foreword of the current Code does not clearly outline the major changes between versions. The recommendation is to include a statement in the foreword summarizing significant changes in every new version to delineate differences and show how the Code has evolved.
- Licensed gaming establishments are only encouraged to comply with the minimum standards, lacking proactive development of their own RG programs. For this, the recommendation is to encourage licensed venues to create and submit their own RG codes (e.g., Australian VGCCC model), with PAGCOR publishing the best practices of licensed venues for transparency.
- Probity measures lack specific penalties and roles for checks. This could be addressed by indicating penalties directly in the Code (e.g., for late PDS submission). For example, the regulatory board should indicate a fixed penalty for late PDS submission. The Code should clarify probity roles required for probity checks, and strengthen operator/staff background checks with periodic reassessments.
- Limited access provisions remain general, without strict verification or clear procedures on GEL suspension. To address the gap, firstly, the Code should enforce stricter age verification with government-issued IDs (e.g., National ID, local or foreign passport, and local or international Driver's licenses), which could prevent those under 18 from using counterfeit IDs. Secondly, create a database of identified financiers/loan sharks with penalties and distribute copies to the gaming establishments. Along with this, licensed establishments should also be accountable and penalized if financiers and loan sharks are found inside the establishments. Lastly, clarify GEL suspension procedures, or if they could still be allowed to get a new license. To enhance monitoring, adopting technologies like biometrics and AI surveillance could be encouraged to be used on the premises.
- Financial transaction guidance is minimal, and casinos are not fully integrated under AML law coverage. The future Code should update the AML section to reflect casinos as covered persons under RA No. 9160. The new code should include more substantial processes for handling financial transactions. For instance, transparent credit processes among gambling operators and assessment processes for individuals applying for credit. Additionally, penalties were issued to gambling operators who opposed the "no credit extension" rule. Further, the total number of ATMs available on the premises should be regulated, and their

placements should be designed to prevent individuals from gambling and withdrawing money impulsively while on the premises. PAGCOR can strengthen consumer spending limits and AML protocols.

- Guidelines on fair game experience lack detail on approvals, monitoring, and fairness audits. The Code should require individual manuals on gaming machines, and PAGCOR could instruct how the gaming rules and instructions should be designed for the benefit of gaming customers. For example, referencing the Australian/New Zealand Gaming Machine National Standard (2022), PAGCOR may stipulate the proper implementation and availability of game manuals and instructions created by licensed venues, and ensure public access to manuals. PAGCOR could also consider employing third-party audits to avoid regulatory oversight of gaming fairness. Lastly, PAGCOR should publish a PAGCOR-accredited list of testing labs and suppliers for gaming machines. Likewise, the new RG code should refer to the PAGCOR list of accredited suppliers of gaming paraphernalia and machines.

- Awareness programs remain surface-level and vague. The Code should include detailed content (e.g., problem gambling risks, exclusion programs, helplines). Perhaps PAGCOR can provide a model awareness program for licensees and indicate when licensees can introduce the awareness programs, maybe at which stage of the gaming customer's journey they can be exposed to the awareness program. For instance, PAGCOR can mandate gambling awareness seminars or modules before the membership sign-up stage, or after the lapse of exclusion periods for individuals under the exclusion program. Awareness seminars (i.e., self-paced online modules) could be a requirement before the release of membership cards. This action can be seen as a deterrent or barrier on the side of licensed venues because additional awareness seminars for new members could complicate the membership sign-up process. However, providing awareness and educational seminars, like providing information on membership benefits, helps customers make informed choices.

- Advertising guidelines are unclear and mostly focused on external ads. The Code should define clear advertising standards with penalties for misleading content. The Code should extend rules to in-house ads (ads within the facility, hotel rooms, and restaurants) and require responsible gambling messages like "Keep it fun" in public spaces inside venues such as bars, restrooms, and lounges. This could be aligned with the awareness program's internal communication standards.

- Facilities regulations expose minors to gaming floors and mandate only minimal RG kiosks. The future Code should restrict minors' access to food/hospitality outlets on gaming floors unless with separate public entrances. While the latest code made RG kiosks mandatory, the new code should explicitly indicate and encourage venues to expand RG kiosk services beyond minimum requirements.
- Staff training is uneven across different gambling venues. The recommendation is to require training for staff in all gambling outlets (including bingo) in providing responsible gambling activities. Further, mandating RG officers in every venue is a good practice that the Philippines can adopt. Much like having an RG kiosk, there should be an assigned person who is more equipped to answer questions related to RG services. Moreover, the new code should include any best practices in training that individual licensed casinos in RG training can use as benchmarks.
- Support facilities are underdeveloped. PAGCOR should identify venues' best practices and include them in the manual, and require venues to submit feedback/tech-based support systems and technological solutions for approval. Additionally, the government may consider increasing the funding for mental health and financial counselling services, which will be the backbone of the support helplines.
- Exclusion programs are outdated, inconvenient, and lack preventive features. To address these, convert mail-based applications to online systems with privacy and confidentiality safeguards despite obstacles in verifying personal information. The new Code may increase publicity of the exclusion program to increase uptake from customers who may need it. Adding pre-expiry notifications will allow the respondents to decide whether to extend the exclusion program or not. Customers may be required to attend awareness programs or sessions before lifting bans. Lastly, optional counseling and debriefing to support recovery and prevent relapses can be added during programs.
- Penalties lack specificity and enforcement details. PAGCOR should update the penalties table to list restricted individuals listed in the NDRP, including those under self-, family-, or licensee-initiated exclusion orders, terminated PAGCOR or licensee employees, and current GEL holders. PAGCOR should specifically apply penalties to venues allowing financiers/loan sharks and include penalties for late submissions, misleading ads, and credit violations. Having explicit information in the

Code will guide the readers and gaming venues to be fully aware of the underlying penalties for not following the Code.

- Help centers are insufficient in number and accessibility. It is recommended to expand government-accredited help centers and integrate digital helplines. This ensures that PACGOR is proactively searching for partners that have achieved the objectives of RG, and for individuals to be aware of. The code should also encourage any licensed gaming venues to partner with help centers.
- The NDRP (National Database of Restricted Persons) lacks confidentiality and scope. To strengthen the code, PAGCOR needs to indicate how confidentiality will be maintained for personal details listed in the NDRP and how these are shared across all licensed gaming venues. Additionally, in line with the limited access recommendation, the database should also include known financiers and loan sharks for easier detection should financiers or loan sharks visit venues.
- Version 6.0 of the Code contains minimal updates despite industry changes. PACGOR should ensure future versions address evolving industry trends and adopt innovative RG strategies implemented globally in the last seven years.
- Operationalization and monitoring of penalties remain vague. The Code should specify penalty amounts, enforcement mechanisms, and compliance monitoring strategies, while also establishing systems to evaluate penalty effectiveness.
- The Code disproportionately focuses on casinos, overlooking other licensed outlets and online gambling. Expand RG provisions to all gaming venues (e.g., bingo centers, small operators) and ensure universal compliance with access, facility, kiosk, and training requirements. PAGCOR should consider developing a dedicated Responsible Gambling Code for online and mobile gambling platforms, incorporating, at a minimum, verified age and identity checks, deposits and loss limits, mandatory self-exclusion tools, and standardized advertising restrictions. These provisions are modeled on comparable frameworks, such as the NCLGS's Model Internet Gaming Act (National Council of Legislators from Gaming States [NCLGS] 2025).

Overall, strengthening Responsible Gaming: Code of Practice requires a more detailed, enforceable, and inclusive approach that addresses regulatory gaps, operational clarity, and coverage across all gaming outlets, not just casinos. By adopting the above recommendations, PAGCOR can align with international best practices, safeguard vulnerable individuals, and ensure that responsible gambling principles are not just aspirational but effectively operationalized in the Philippine gaming industry.

Beyond the revisions to the Code's content, several legislative and executive pathways are already under active discourse that would affect the institutional environment in which the RG Code operates. At an executive level, executive orders and memorandums demonstrate that executive action can move faster than Code-level revisions when gambling harms are judged urgent, for instance, online gambling harms. At the legislative level, there are currently multiple pending bills in the Senate. For example, House Bill No. 10171 and House Bill No. 3559 propose restructuring PAGCOR by separating its dual functions into distinct functions (Basilio 2024). Efforts to strengthen the RG Code's consumer-protection function will be more durable when coordinated and in parallel to institutional and legislative developments.

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Appendix

Table 1. Results of text comparisons between versions

Comparison between Version 3.0 (2014), Version 4.0 (2015), Version 5.0 (2017), and Version 6.0 (2021)	
Section	
Foreword section	Introduces the concept of gaming and gambling, highlighting both their entertainment value and potential negative impacts when done excessively.
	Version 3.0 (2014) 44 Pages - It emphasizes PAGCOR's role in regulating gaming establishments in the Philippines and ensuring responsible gaming practices among its licensees. - The Code of Practice outlines rules and guidelines to minimize harm, prevent gambling addiction, and prohibit underage gambling. While the principles apply to all gaming operators, implementation methods may vary depending on the type of gaming. - It is stated that the Code is based on the best global practices and will be regularly reviewed and updated to reflect advancements in research, technology, and business practices.
	Version 4.0 (2015) 48 pages Same Foreword
	Version 5.0 (2017) 49 Pages Same Foreword
	Version 6.0 (2021) 61 Pages Same Foreword
	Overall changes from Version 3.0 No change
Definition of terms	Terminologies used in the Code were defined.
	Version 3.0 (2014) 44 Pages Terms defined: - Gaming - Licensee - Licensed gaming establishment - National Database of Restricted Persons (NDRP) - Operator - Problem Gambler - Gaming Employment License (GEL) - Problem Gambling-Ludomania

	Version 4.0 (2015) 48 pages Terms defined: ■ Billboard Changes: ■ Terminologies arranged alphabetically
	Version 5.0 (2017) 49 Pages ■ The same statements as Version 4.0
	Version 6.0 (2021) 61 Pages Additional terms: ■ Financier/Loan Shark ■ PAGCOR ■ Personal Disclosure Statement (PDS) ■ Board of Directors of PAGCOR ■ PDS Database
	Overall changes from Version 3.0 Changes: ■ Inclusion of new terminologies.
Probity Measures	■ Set standards and measures “to establish integrity, financial soundness, business ability, and suitability to serve in a licensee’s Board of Directors.”
	Version 3.0 (2014) 44 Pages ■ The licensees’ Board of Directors nominees, sole proprietors, and partners must submit a Personal Disclosure Statement (PDS) form yearly. ■ Filipinos and foreign residents need to attach copies of their income tax returns from the previous year. ■ Nonresident foreigners need to attach their passports instead of ITRs. ■ Submission of PDS is before or on 15 May of every year
	Version 4.0 (2015) 48 pages Additions in Version 4.0 ■ Electronic PDS submission is required for members of the Board of Directors as of 31 December of the previous year. ■ Filipinos and resident foreigners must indicate their Tax Identification Number (TIN). ■ In addition to the ITR and passport, a Certificate of Non-Filing of ITR must be obtained if no income was earned from the previous year. ■ PDS is now done electronically. ■ The submission deadline is between 1 January and 31 May of every year.

	■ Penalties are introduced for late submissions. ■ The PDS application guide was included.
	Version 5.0 (2017) 49 Pages ■ Same as Version 4.0
	Version 6.0 (2021) 61 Pages ■ Same as Version 4.0
	Major changes include Additional terms: ■ Financier/Loan Shark ■ PAGCOR ■ Personal Disclosure Statement (PDS) ■ Board of Directors of PAGCOR ■ PDS Database
Limited Access	■ The section identified people who have limited access to licensed venues.
	Version 3.0 (2014) 44 Pages ■ The Code referred to PAGCOR Charter and Malacañang Mem. Circ. No. 8 to guide the section. ■ Persons under 21, Armed Forces of the Philippines (AFP) officers, Philippine National Police (PNP) officers, and government officials are restricted from entering, staying, or playing in a gambling venue. ■ Establishments are to formulate their rules on membership and registration. ■ Gaming employment license (GEL) holders are prohibited from playing in any establishment in the Philippines. ■ A three-tier penalty is imposed: first offense: two weeks' suspension, second offense: one month's suspension, and third offense: revocation of employee license.
	Version 4.0 (2015) 48 pages ■ The Code explicitly indicated PD No. 1869 (PAGCOR Charter) as amended by RA No. 9487 and Malacañang Mem. Circ. No. 8, supporting the exclusion of persons under 21, AFP and PNP officers, and government officials. ■ A need to verify whether an employee violates such company policy, the procedure is shown in Annex B: Employee Verification Flowchart. ■ New procedures for GEL holders are available through the Employee Verification Flowchart. ■ Penalties for GEL holders remain.

	Version 5.0 (2017) 49 Pages ■ Same statement as Version 4.0
	Version 6.0 (2021) 61 Pages Additions in Version 6.0 ■ The Code explicitly indicates the provisions from Presidential Decree 1869 (PAGCOR Charter) as amended by RA No. 9487 and Malacañang Mem. Circ. No. 6, Series of 2016. ■ No access for people under the National Database of Restricted Persons (NDRP) ■ Establishments are still encouraged to formulate their rules on membership and registration. ■ Penalties were extended and revised to two tiers: the first offense is a six-month suspension, and the second offense is revocation. ■ Expanded restrictions to other categories, such as financiers and loan sharks.
	Major changes include ■ Additional restricted groups: People under NDRP, financiers, and loan sharks. ■ New penalties for noncompliance by GEL holders.
Financial Transactions	■ Indicates regulations on anti-money laundering, credits, and commercial banking access
	Version 3.0 (2014) 44 Pages ■ Anti-Money Laundering Act (RA No. 9160) amendments under review to include casinos as covered persons. ■ Guidelines on credits by gaming operators to players without premium accounts and non-VIP customers. ■ Guidelines on banking units inside gaming areas. For example, ATMs inside the gaming areas should be carefully designated. Commercial banking facilities should be limited to foreign exchange transactions only.
	Version 4.0 (2015) 48 pages ■ The same statements as Version 3.0
	Version 5.0 (2017) 49 Pages ■ The same statements as Version 3.0
	Version 6.0 (2021) 61 Pages ■ The same statements as Version 3.0
	Major changes include ■ No Change

Fair Gaming Experience	■ Section talking about game rules and manuals, and gaming machines.
	Version 3.0 (2014) 44 Pages ■ PAGCOR must approve game rules and game manuals. ■ Gaming machines must be certified by international testing laboratories.
	Version 4.0 (2015) 48 pages ■ The same statements as Version 3.0
	Version 5.0 (2017) 49 Pages ■ The same statements as Version 3.0
	Version 6.0 (2021) 61 Pages ■ The same statements as Version 3.0
	Major changes include ■ No Change
Awareness Program	■ Covers efforts to create awareness about problem gambling, slogans, communication media, and standard RG information.
	Version 3.0 (2014) 44 Pages ■ Awareness campaigns focused on problem gambling, signs of problem gambling, age restrictions, exclusion procedures, helplines, therapists, counseling, and rehabilitation center contact details. ■ The slogan is visible in RG materials in gaming venues. ■ GLDD needs to approve the layout of communication media. Signage should be visible. The licensee's website should be transparent about its RG programs. ■ RG information must be included in betting and marketing materials, membership booklets, and information leaflets for patrons. ■ Standard RG information, such as: Persons under 21 cannot play; for responsible gambling info, visit www.pagcor.ph/ regulatory or email keepitfun@pagcor.ph.
	Version 4.0 (2015) 48 pages ■ The same statements as Version 3.0
	Version 5.0 (2017) 49 Pages ■ The same statements as Version 3.0
	Version 6.0 (2021) 61 Pages ■ The same statements as Version 3.0
	Major changes include ■ No Change

Advertisements	■ This section covers guidelines for licensees' advertising in media, including information on general rules, mass media coverage, and billboard content and location.
	Version 3.0 (2014) 44 Pages ■ Advertising materials should be socially responsible. ■ Advertisement guidelines: "must not portray, encourage, or condone gambling behavior that is socially irresponsible or could lead to financial harm, directed at children or feature people who are or who appear to be under 21 years old, or suggest that gambling can be a solution to financial problems." ■ List of mass media coverage. ■ Slogans such as "Keep it Fun" and the prohibition of the under-21-year-old logo should be mandatory elements of the advertising content. ■ Advertising messages must not target 21-year-olds and below minors, suggest skill affects outcomes, promote gambling as income, or mislead about odds and prizes. ■ Billboards for gambling must be at least two hundred meters away (200 m) from schools and churches.
	Version 4.0 (2015) 48 pages ■ The same statements as Version 3.0
	Version 5.0 (2017) 49 Pages Additions in Version 5.0 ■ Revised mandatory element for advertising content: inclusion of end tag for radio ads: "Keep it Fun. Game Responsibly." closing tag for TV commercials, print ads, billboards, web-based promos, and other media: "Gaming for 21 years and above only. Keep it Fun. Game Responsibly." ■ The rest of the statements are the same.
	Version 6.0 (2021) 61 Pages Additions in Version 6.0 ■ Advertising guidelines and messages are the same. ■ Billboards must be at least 200 meters away from schools, churches, racing outlets, public markets, informal settlers, and resettlement areas.
	Major changes include Overall changes from Version 3 ■ The change includes mandatory elements for end/closing tags on radio, billboards, TV commercials, and print ads. ■ Including racing outlets, public markets, informal settlers, and resettlement areas as part of the 200-meter radius.

Facilities	■ This section shows the provisions of several facilities of the casino Version 3.0 (2014) 44 Pages ■ The section focuses on childcare and entertainment venues. ■ Child Care - Minors (children less than 18 years old) must never linger, be left alone unaccompanied, or be unsupervised by their adult companions. ■ Entertainment Venues - to provide hospitality and other entertainment venues to encourage customers to take breaks in play. Version 4.0 (2015) 48 pages ■ The same statements as Version 3.0 Version 5.0 (2017) 49 Pages ■ The same statement as Version 3.0 Version 6.0 (2021) 61 Pages Additions in version 6.0 ■ Addition of a Responsible Gaming helpdesk/kiosk in casinos. ■ It must be conspicuously located within the gaming area, display the RG slogan, be manned 24/7, and always be required to have an RG representative, RG brochures/flyers/cards, and exclusion application forms. Overall changes from Version 3 ■ Inclusion of a responsible gaming helpdesk or kiosk in casinos.
Training and Management of Staff	■ Licensees to conduct training for the employees focused on problem gambling. Version 3.0 (2014) 44 Pages ■ The focus of the program, training, symposia, refresher courses, and seminars. ■ The Licensee's Responsible Gaming Program ■ How to spot a problem gambler ■ How to respond to questions about the Responsible Gaming program ■ What to do when confronted by problem gamblers or relatives ■ Availability of helplines ■ Employees' attendance is a prerequisite for maintaining their Gaming Employment License. ■ The licensee should ensure that all employees are aware of the exclusion program and referrals for help for both individuals with problem gambling and family members.

	Version 4.0 (2015) 48 pages ■ The same statements as Version 3.0
	Version 5.0 (2017) 49 Pages ■ The same statements as Version 3.0
	Version 6.0 (2021) 61 Pages ■ The same statements as Version 3.0
	Major changes include ■ No Change
Support Facilities	■ Licensees must set up complaint resolution mechanisms for gambling concerns, using helplines (phone) and the internet (email or website).
	Version 3.0 (2014) 44 Pages ■ Licensees need to establish a helpline and feedback system for complaints about problem gambling. ■ Helplines include a 24/7 hotline available for customers who seek help. ■ Usage of the licensee's official network ID to inform patrons of complaint channels and membership account status. ■ Licensees must provide an official email for problem gambling support, ensure immediate responses, and include responsible gaming programs on their website, such as exclusion programs, referrals to therapists and rehabilitation centers, and referrals to PAGCOR's responsible gaming email address. ■ Counselling information and contact details should be readily available for parties in need of help. ■ For feedback systems, gaming providers should maintain a responsible gaming incident record that includes information on the "date, time, location, and nature of the event, contact details and description of the person about whom the action was taken, action taken and by whom, contact details of the person requesting, and the person or institution to whom the patron was referred."
	Version 4.0 (2015) 48 pages ■ The same statements as Version 3.0
	Version 5.0 (2017) 49 Pages ■ The same statements as Version 3.0
	Version 6.0 (2021) 61 Pages ■ The same statements as Version 3.0
	Major changes include ■ No Change

Exclusion Program	■ Program to bar oneself or relatives who are developing gambling-related problems from gaming venues. All information must not be disclosed to any third party.
	Version 3.0 (2014) 44 Pages ■ Players and family members can apply for self or family exclusions with specified documents and durations by sending exclusion requests to PAGCOR via email. ■ Names of excluded individuals are listed in the National Database of Restricted Persons (NDRP), with access only given to designated personnel of stakeholders of the Philippine gaming industry. Exclusions will take effect at all PAGCOR-operated and regulated gaming facilities. ■ Player exclusion types: Self-exclusion, family exclusion, and licensee-emanating exclusion. ■ Self-exclusion (irrevocable for 6 months, 1 year, 5 years, or a lifetime, with an extension for another 6 months). An application can be initiated by sending an inquiry to PAGCOR's email address. ■ Family exclusion (3 months, reapply for 6 months, and subsequent re-applications can be every year). The applicant (family member) could be a spouse, child, or parent of the player (respondent). The application can be initiated by sending an inquiry to PAGCOR's email address. ■ Licensee-emanating exclusion (operator or venue may issue an exclusion order for individuals in their venue based on several grounds; operator exclusion will only be within the venue and not in other venues). An in-house Committee of Assessors (CoA) will determine the operator's recommendation, and the respondent will be notified 72 hours before the exclusion takes effect. ■ Licensees may apply for an Exclusion Order with PAGCOR to recommend that an individual be excluded from all gaming establishments; PAGCOR will evaluate this. If PAGCOR issues the Licensee-Emanating Exclusion Order, the exclusion will take effect for 3 months. Subsequent re-applications are granted for 1 year. All nationwide exclusions are posted in the NDRP. ■ Individuals issued with a Licensee-emitting Exclusion Order are not qualified to obtain a gaming employee license (GEL). ■ Submission of both self and family exclusion applications is through mail. ■ Bread of execution order: any exclusion order not to be revoked before the expiration date

	Version 4.0 (2015) 48 pages ■ The same statements as Version 3.0
	Version 5.0 (2017) 49 Pages Additions in Version 5.0 ■ Respondents for self-exclusion may apply for a Petition to Amend the Exclusion Period (RG Form 8) only after the 6-month irrevocable period.
	Version 6.0 (2021) 61 Pages Additions in Version 6.0 ■ New provisions for amending exclusion periods. ■ Family exclusion: The periods include 6 months, 1 year, and 3 years. A family member may reapply for exclusion. ■ Licensee emanation exclusion order options for 1 year, 5 years, or lifetime.
	Major changes include Overall changes from Version 3 ■ The introduction of a formal petition to amend the exclusion period for self-exclusion. ■ Removal of lifetime exclusion for self-exclusion. ■ Family- nominated exclusion: period includes 6 months, 1 year, and 3 years. ■ Inclusion of more extended licensee-emanated exclusion orders to 1 year, 5 years, and lifetime.
Penalties	■ This section contains a table of penalties for excluded people
	Version 3.0 (2014) 44 Pages ■ Not available in version 3.0. ■ No specific penalties were outlined.
	Version 4.0 (2015) 48 pages ■ Not available in version 4.0. ■ No specific penalties were outlined.
	Version 5.0 (2017) 49 Pages ■ Not available in version 5.0. ■ No specific penalties were outlined.
	Version 6.0 (2021) 61 Pages Introduction of a penalty table, including fines. ■ The penalty is for excluded persons, including government officials, Armed Forces of the Philippines members, individuals listed in NDRP, employees holding Gaming Employment Licenses, and those indirectly involved in gaming operations to play. The penalty is ₱100,000 per entry or play per person.

	■ Allowing minors (below 21 years old to enter the licensed venue has a penalty of closure for violations.
	Major changes include ■ Penalty for allowing excluded people.
Help Centers in the Philippines	Version 3.0 (2014) 44 Pages ■ The list includes four different help centers located in the Philippines, with contact persons, addresses, telephone numbers, and email addresses. These help centers include Life Change Recovery Center, Support Group and Training Consultancy, Inc., Roads and Bridges to Recovery, and Penuel Home.
	Version 4.0 (2015) 48 pages Changes in Version 4.0 ■ Two presented help centers located in the Philippines: Life Change Recovery Center (Quezon City), and Roads and Bridges to Recovery (Pasig City and Mandaue City)
	Version 5.0 (2017) 49 Pages ■ Same help centers as Version 4.0
	Version 6.0 (2021) 61 Pages Additions in Version 6.0 ■ The list of centers was cut into two centers, including Life Change Recovery Center (Quezon City) and Bridges of Hope Drugs and Alcohol Rehabilitation Foundation, Inc. (emphasized two branches in Quezon City and Mandaue City).
	Major changes include Changes include: ■ Reduction of the list of help centers in the Philippines.
National Database of Restricted Persons	Version 3.0 (2014) 44 Pages ■ Inclusion of the National Database of Restricted Persons (NDRP): This document outlines the Database's objectives, the definition of terms, Persons for inclusion in the NDRP, Access levels for different roles within the GLDD, licensees, and gaming establishments, the information contained in the NDRP, and the Use of the NDRP as a reference for issuance or denial of GEL. ■ Procedures for NDRP include sections: To add a person for exclusion, to edit additional information fields, to search / verify an excluded person, to view information on an excluded person, and to lift the exclusion order of a person in the NDRP

	Version 4.0 (2015) 48 pages Additions in Version 4.0 ■ Updated people for inclusion in the NDRP to include terminated employees by PAGCOR or any licensee for just cause in the Terminated Employee Database (TED) and GEL Holders. ■ The rest are statements
	Version 5.0 (2017) 49 Pages ■ Same Manual as Version 4.0
	Version 6.0 (2021) 61 Pages Additions in Version 6.0 ■ Updated definition for the restricted person to include GEL Holders and Financiers/Loan sharks. ■ Updated procedures for NDRP: In the section to add a person for banning, it included the procedure to upload the player exclusion order.
	Major changes include Changes include: ■ Changes in the definition of restricted persons and the persons for inclusion in the NDRP and the procedure for NRDP.
Annex Inclusions	Version 3.0 (2014) 44 Pages ■ RG Form 1 – Player Verification Form, RG Form 2 – Self-Exclusion Application Form ■ RG Form 3 – Family Exclusion Application Form ■ RG Form 4 – Licensee-emitting Exclusion Order ■ RG Form 5 – NDRP Online User Access Control Form ■ Annex A – GLDD Circular #1 ■ Annex B – Player Verification Process Flowchart ■ Annex C – Annual Personal Disclosure Statement (PDS) ■ Annex D – National Database of Restricted Persons (NDRP) User Manual
	Version 4.0 (2015) 48 pages Omitted Annexes: ■ GLDD Circular #1 ■ Annex C – Annual Personal Disclosure Statement (PDS)-replaced by additional annexes. Additional Annexes: ■ RG Form 1 – Employee Verification Form ■ RG Form 06 – Endorsement for Electronic Personal Disclosure Statement

	Version 5.0 (2017) 49 Pages Additional Annexes ■ RG Form 8 – Petition to Amend the Exclusion Period
	Version 6.0 (2021) 61 Pages Additional Annexes ■ RG Form 09 – Player Exclusion Order ■ RG Form 10 – Notice to Show Cause ■ RG Form 11 – Notice of Imposition of Penalty ■ RG Form 12 – RG Compliance Report ■ RG Form 13 – Notice of Non-compliance ■ Diagram 3 – Compliance Verification Flowchart
	Major changes include Major Inclusions: ■ Employee verification form. ■ Endorsement for Electronic Personal Disclosure Statement ■ Personal Disclosure Statement Online User Access Control ■ Petition to Amend the Exclusion Period ■ Notice to Show Cause ■ Notice of Imposition of Penalty ■ RG Compliance Report ■ Notice of Non-compliance ■ Personal Disclosure Statement Application Guide ■ Certificate of Non-Filing of Annual Income Tax Return ■ Employee Verification Flowchart ■ How to Submit a Personal Disclosure Statement Electronically ■ Compliance Verification Flowchart