Recognition Notice Framework:

Consultation Feedback and MGA Position

Malta Gaming Authority

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1 Introduction

In April 2026, the Malta Gaming Authority ("MGA" or the "Authority") issued a targeted consultation on proposed enhancements to the Recognition Notice ("RN") framework. The consultation sought feedback on a number of proposals intended to enhance the framework, improve the Authority's understanding of RN activity and support a more risk-based approach to its administration.

The feedback received was constructive and valuable. Stakeholders generally supported the overall direction of the proposed enhancements whilst emphasising the importance of proportionality, operational practicality, and avoiding unnecessary duplication with requirements imposed by foreign licensing authorities.

This document summarises the key feedback received during the consultation process, explains how the Authority has considered the matters raised, and sets out the resulting position and approach to implementation.

2 Cross-Cutting Themes

2.1 Overaching Position

The Authority welcomes the constructive feedback received and acknowledges the concerns raised regarding implementation.

The RN framework is an increasingly important component of Malta's gaming ecosystem. The continued growth and development reinforce the need for the Authority to maintain an appropriate understanding of the RN population, its footprint in Malta, material developments affecting RN activity and the effective administration of the framework.

The proposed enhancements were informed, among other considerations, by observations arising from Malta's most recent National Risk Assessment, conducted in 2023, which highlighted vulnerabilities relating to limited visibility over certain aspects of the RN framework. The revised framework seeks to address these observations through a proportionate and risk-based approach whilst avoiding unnecessary duplication with the authority responsible for the underlying licence.

The revised approach is therefore not intended to replicate the role of foreign authorities. Rather, the objective is to provide the MGA with proportionate visibility over an authorisation framework administered under the Gaming Act (Cap. 583 of the Laws of Malta), allowing it to better understand the scale, footprint and risk profile of RN activity and to support evidence-informed policy and operational decisions.

The Authority has consequently refined a number of the original proposals to enhance proportionality, reduce unnecessary duplication and provide greater differentiation between different categories of RN holders.

2.2 Proportionality, Purpose and Avoidance of Duplication

2.2.1 Stakeholder Position

Stakeholders generally recognised the Authority's legitimate interest in understanding the RN framework and maintaining appropriate visibility over RN activity. They nevertheless sought clearer links between individual information requests and the purpose for which the information would be used.

Respondents consistently emphasised the need to avoid duplicating information already held by the MGA or by the authority issuing the underlying licence, and to ensure that any new measures remain practical and proportionate.

2.2.2 MGA's Position

The Authority acknowledges the importance of ensuring that any information requested under the revised RN framework serves a clearly defined and proportionate purpose.

Information collected under the revised framework will be used to support the Authority's understanding of scale, nature, footprint and evolution of RN activity; inform risk assessment and policy development; and support the effective administration of the RN framework.

The new information will also assist the Authority in determining whether additional engagement, clarification or information is required in specific circumstances and, where appropriate, support regulatory cooperation and information exchange with foreign licensing authorities.

The Authority wishes to emphasise that information will not be collected for the purpose of replicating the day-to-day oversight undertaken by the foreign authority issuing the underlying licence.

The MGA will continue to assess the necessity, relevance and proportionality of any information requirement, taking into account the purpose for which the information is sought, the risk profile of the RN holder, the information already available to the Authority, information available through foreign licensing authorities or other reliable sources, and any relevant regulatory, policy, risk assessment or cooperation objective that the information is intended to support.

Where the Authority considers that additional information is required to support a specific assessment, understand a material development, address an identified risk, or fulfil a regulatory, statutory or policy objective, the Authority may request further information on a risk-based and proportionate basis.

2.3 Greater Differentiation Between B2B and B2C RN Holders

2.3.1 Stakeholder Position

Respondents generally supported greater differentiation between the B2C and B2B categories, whilst emphasising the need to ensure that B2B operators are not subject to requirements developed primarily for B2C activity. Some respondents proposed that the RN framework should further distinguish between B2C operators that actively target or service Maltese players and those that do not.

2.3.2 MGA's Position

The Authority agrees that a greater distinction between B2B and B2C RN holders is appropriate and this principle will be reflected in the revised framework.

While certain requirements relating to ownership, integrity and regulatory standing will continue to apply to both B2B and B2C applicants, requirements relating to Anti-Money Laundering and Countering the Financing of Terrorism ("AML/CFT") confirmations, MLRO contact details, declarations concerning FATF high-risk jurisdictions subject to a call for action and certain ongoing information-gathering measures will focus on B2C activity only.

Any future extension of such measures to B2B RN holders will be considered separately and supported by an identified risk or policy rationale.

Furthermore, the Authority does not consider Maltese player activity to be a sufficient standalone determinant of risk. While player location may be a relevant consideration, the RN risk profile is informed by a wider set of risk factors and therefore does not warrant a binary distinction based solely on whether Maltese players are targeted.

This approach is intended to ensure that requirements remain relevant, proportionate and aligned with the nature of the activity being conducted.

2.4 New Applicants and Existing RN Holders

2.4.1 Stakeholder Position

Stakeholders highlighted the importance of proportionality in the implementation of any new requirements, particularly where certain information was not historically collected from RN holders or may already be available to the Authority through other regulatory processes.

2.4.2 MGA's position

The Authority agrees that the implementation should distinguish between new applicants and existing RN holders.

For new RN applicants, the relevant information requirements will form part of the onboarding and assessment process.

For existing RN holders, the Authority recognises that certain information proposed as part of the revised framework was not historically collected at authorisation stage. The Authority will therefore adopt a phased and risk-based approach rather than require all existing RN holders to provide the full set of additional information at the same time.

In determining whether additional information is required from an existing RN holder, the Authority will take into account the information already available to it, the circumstances and risk profile of the RN holder, and the purpose for which the information is required.

Where relevant and current information is already available to the Authority through existing MGA authorisations or previous assessments, the Authority may rely on that information rather than request its resubmission. Additional information may nevertheless be requested where existing records are incomplete, outdated or otherwise insufficient for the relevant assessment.

This approach is intended to address historical information gaps progressively while avoiding unnecessary duplication and ensuring that implementation remains proportionate and risk-based.

2.5 Commercial Sensitivity and Confidentiality

2.5.1 Stakeholder Position

Stakeholders highlighted the commercial sensitivity of certain information proposed as part of the framework, including information relating to player numbers, transaction values, payment methods and operational structures. Respondents sought assurance that commercially sensitive information would be appropriately safeguarded and that the information requests would remain proportionate to the Authority's intended regulatory and policy purposes.

2.5.2 MGA's Position

The Authority recognises the commercial sensitivity of certain information and has reflected this in the design of the revised requirements.

Where the intended regulatory or policy purpose can be achieved without collecting exact or granular data, the MGA will favour aggregate information, categories, ranges or thresholds. This approach is intended to provide the MGA with the information necessary to understand the scale, nature and risk profile of RN activity while limiting the collection of commercially sensitive information to what is necessary and proportionate.

Information provided to the Authority will be handled in accordance with applicable legal and confidentiality requirements and used for the purposes identified under the revised framework.

Where more detailed information is required in specific circumstances, any request will be considered having regard to its purpose, relevance and proportionality.

2.6 Risk Assessment

2.6.1 Stakeholder Feedback

Stakeholders generally supported the Authority's intention to adopt a risk-based approach and recognised the importance of tailoring engagement according to risk. Respondents nevertheless requested greater clarity regarding the methodology to be applied and how the resulting risk profile would influence information requests and engagement.

2.6.2 MGA's Position

The Authority agrees that a proportionate and risk-based approach is appropriate and does not intend to apply the same level of engagement to all RN holders.

The MGA is therefore developing a risk-rating methodology which will take into account factors relating to jurisdictional risk, regulatory considerations, ownership and control arrangements, compliance and enforcement history and other relevant risk indicators.

The resulting risk profile may influence the nature and frequency of engagement with an RN holder, including through annual reporting requirements, as well as the level of interaction with the authority issuing the underlying licence.

2.7 Legal Basis and Regulatory Powers

2.7.1 Stakeholder Feedback

Some stakeholders requested further clarification regarding the legal basis for certain proposed enhancements to the RN framework and the Authority's powers to obtain information and introduce additional requirements in respect of RN applicants and holders. Respondents emphasised the importance of ensuring that any measures introduced remain within the scope of the Authority's statutory functions and regulatory remit.

2.7.2 MGA's Position

The Authority acknowledges the feedback received regarding the legal basis of certain proposals. In developing the proposed enhancements, the Authority took into account its functions and regulatory objectives under the Gaming Act and the applicable regulatory framework. Prior to launching the consultation, the Authority also considered the available legal basis and the most appropriate mechanisms for implementing the proposals. This exercise identified requirements that could be introduced within the existing regulatory framework, as well as others that may require amendments to that framework. Where such amendments are necessary, the Authority will introduce them through the appropriate regulatory process.

3 Authorisation and Onboarding Requirements

3.1 Beneficial Owner Information

3.1.1 Stakeholder Feedback

Stakeholders generally recognised the importance of transparency regarding ownership and control arrangements and acknowledged the relevance of this information to the Authority's assessment. Some respondents nevertheless sought clarification regarding the extent of information that would be required, particularly where beneficial ownership information may already be available to the Authority, another regulator or through relevant registries.

3.1.2 MGA's Position

The Authority has refined the proposal and will not require the routine submission of a full corporate structure as part of every application. Rather, applicants and RN holders will be required to provide information identifying their ultimate beneficial owner(s). In respect of existing RN holders, the information will be requested on a staggered basis, as determined by the Authority.

The Authority will, where appropriate, corroborate the information provided against information available from the relevant registry. Where the information available is insufficient, unclear or requires further verification, the Authority may request additional information or documentation necessary to establish the identity of the ultimate beneficial owner(s) and understand the relevant ownership or control arrangements.

For the purposes of the RN framework, the beneficial ownership will be interpreted in accordance with the applicable AML/CFT legal and regulatory framework, including the relevant principles set out in the FIAU Implementing Procedures, Part I.

Supporting guidance and implementation materials will be made available on the Authority's website to provide further clarity on the information required and the manner in which the requirement will be applied.

3.2 Legal Opinion Requirements

3.2.1 Stakeholder Feedback

Stakeholders raised significant concerns regarding the proposed standardised legal opinion template. These related principally to the rigidity of a prescribed template, jurisdiction-specific legal differences, the ability of foreign counsel to provide certain confirmations, increased legal costs and application timelines and the risk of requiring legal advisers to opine on matters that are operational rather than legal in nature.

Several respondents also questioned whether some information could instead be confirmed directly by the applicant or supported through existing regulatory documentation.

3.2.2 MGA's Position

Having considered the feedback received, the Authority agrees that a more flexible approach is appropriate and will not proceed with a standardised legal opinion template.

Instead, the Authority intends to replace this proposal with a set of clear, required confirmations, preserving consistency in the information received while allowing sufficient flexibility to accommodate jurisdiction-specific legal frameworks. Providing greater clarity regarding the confirmations required is expected to support a more efficient and effective assessment process.

The revised approach will also introduce greater differentiation between B2B and B2C applicants. Certain confirmations relating to AML/CFT obligations will only be relevant to B2C operators, while the remaining confirmations will continue to focus on matters pertaining to the RN assessment, including licence scope, regulatory oversight and the extent to which the relevant regulatory framework is comparable to Malta's. The final list of confirmations and related guidance will be issued as part of the implementation of the revised framework on our website.

3.3 Regulatory History, Fitness and Propriety

3.3.1 Stakeholder Feedback

Stakeholders raised concerns regarding the breadth of the proposed regulatory history disclosures, particularly the proposed reference to regulatory correspondence. A number of stakeholders suggested that the focus should instead be placed on material regulatory and integrity matters relevant to the Authority's assessment, including enforcement actions, licence restrictions, licence suspensions and other matters that may materially affect the applicant's regulatory standing or ability to operate under the relevant licence.

3.3.2 MGA's Position

Having considered the feedback received, the Authority has significantly narrowed the proposed requirement. Applicants will not be required to provide broad regulatory history disclosures or routine regulatory correspondence.

Instead, the requirement will be limited to matters relevant to the Authority's assessment of the applicants':

- fitness and propriety;
- ownership and control arrangements; and
- licensing status and material regulatory matters affecting the applicant's ability to operate under the relevant licence.

These requirements will apply to both B2B and B2C operators.

For B2C operators, the Authority may additionally request information concerning material AML/CFT/ targeted financial sanctions ("TFS") related enforcement measures relating to the underlying licensed activity.

The proposed reference to matters "where known" will not be retained. Further guidance will be provided to support the consistent application of these requirements.

3.4 MLRO Contact Details

3.4.1 Stakeholder Feedback

The proposal to collect MLRO contact details for B2C applicants generally received support. Respondents recognised the value of establishing a clear AML/CFT point of contact for communication and engagement purposes. Stakeholders nevertheless sought clarification regarding the intended use of the information and the treatment of group-level MLRO arrangements.

3.4.2 MGA's Position

Having considered the feedback received, the Authority will proceed with the requirement for B2C applicants to provide appropriate MLRO contact details.

The primary purpose of collecting MLRO contact details is to facilitate AML/CFT and targeted financial sanctions awareness, outreach and training initiatives involving RN holders.

Where necessary, the information may also be used to establish an appropriate point of contact for AML/CFT/TFS related matters, including communication in connection with the RN framework.

The Authority recognises that MLRO functions may be structured differently across organisations and jurisdictions and will therefore take account of group-level arrangements where appropriate.

The collection of these contact details is not intended to create additional obligations or alter the allocation of AML/CFT responsibilities under the applicable legal framework. Having considered the feedback received, the Authority intends to proceed with this requirement for B2C operators.

3.5 Jurisdictional and Activity-Scope Declarations

3.5.1 Stakeholder Feedback

Stakeholders sought clarification regarding the purpose and scope of the proposed declarations relating to sanctioned jurisdictions and FATF high-risk jurisdictions, subject to a call for action. Respondents also requested clarification regarding the purpose of the land-based activity declaration and whether the requirement should remain declaration-based rather than create a broader ongoing verification obligation.

3.5.2 MGA's Position

The Authority acknowledges the concerns raised regarding the purpose and scope of these declarations and agrees that the requirements should remain proportionate to the nature of the activity conducted under the RN.

In relation to jurisdictional exposure, the declarations are intended to provide the Authority with visibility as to whether activities conducted under the RN involve sanctioned jurisdictions or FATF high-risk jurisdictions subject to a call for action, given the relevance of such exposure to the Authority's broader risk assessment of the RN framework.

In relation to land-based gaming activity, the declaration is intended to identify whether the RN extends to, or is associated with, land-based gaming activity and thereby enables the Authority to understand the nature and scope of the activity recognised under the framework.

The Authority will apply these requirements in a proportionate manner, distinguishing between B2B and B2C RN holders where appropriate, based on the relevance of the information to their respective activities.

4 Ongoing Monitoring and Information Gathering

4.1 General Reporting Principles

4.1.1 Stakeholder Feedback

A recurring theme across consultation responses was the need to ensure that any information-gathering exercise introduced under the revised RN framework remains proportionate, practical to implement and aligned with the stated objectives of the framework. Stakeholders emphasised the importance of avoiding unnecessary duplication with existing regulatory obligations, recognising the differing characteristics of B2B and B2C business models, and providing sufficient guidance on reporting methodologies, definitions and implementation expectations.

Respondents also noted that individual metrics, such as player numbers, transaction volumes, payment methods, employee numbers or revenue figures, should not be viewed in isolation as indicators of AML/CFT risk and should be considered in the broader context of each RN holder's operations and risk profile.

4.1.2 MGA's Position

The Authority acknowledges these views and has refined a number of the proposed measures accordingly. The information collected under the revised framework is intended to support the Authority's understanding of the scale, nature, evolution and operational footprint of activity conducted under the RN framework. Individual data points will not be considered in isolation and should not be interpreted as standalone indicators of AML/CFT risk.

The Authority will seek to adopt a proportionate and practical approach to implementation, taking into account existing reporting obligations, operational constraints and the differing characteristics of B2B and B2C RN holders. Where appropriate, reporting requirements have been limited in scope, simplified through the use of thresholds, bands or aggregated information, and tailored to the nature of the RN activity concerned.

The Authority also recognises the importance of consistency and comparability across operators. Further guidance will therefore be issued regarding definitions, reporting methodologies, reporting periods, allocation approaches and any other aspects necessary to support the effective implementation of the revised framework.

4.2 Number of Players or Clients

4.2.1 Stakeholder Feedback

While some stakeholders acknowledged that player information may assist the Authority in understanding the scale and evolution of RN activity, concerns were raised regarding the relevance and proportionality of the proposed information requirement.

Respondents also highlighted the need for clear and consistent definitions, noting that concepts such as “player” and “client” could be interpreted in different ways. Several stakeholders emphasised the importance of establishing standardised assumptions and methodologies to promote comparability across operators.

Additional concerns related to the practical challenges of attributing information to a specific licence or jurisdiction, as well as the appropriate scope of any reporting obligation, including whether information should focus solely on Malta-facing activity or extend to broader RN activity.

4.2.2 MGA’s Position

The Authority agrees that B2B and B2C RN holders should not be subject to an identical approach in this area. Accordingly, the initial information-gathering exercise will focus solely on active-player accounts information relating to B2C RN holders.

To promote consistency and comparability across operators, the Authority will establish standardised definitions and reporting methodologies. Supporting guidance will define the concept of an active player and the applicable reporting period.

Client information relating to B2B RN holders will not form part of the initial reporting exercise. The Authority will consider any future information requirements for B2B RN holders separately, and only where there is an identified supervisory, policy or risk-based need.

4.3 Distribution of Active Player Accounts by Deposit Value

4.3.1 Stakeholder Feedback

While some stakeholders recognised that aggregate transactional information may assist in understanding the scale and nature of activity conducted under the RN framework, concerns were raised regarding the proportionality, supervisory value and practical implementation of the proposed requirement.

Respondents questioned whether transaction data relating to activity conducted under a foreign licence was necessary, particularly where such activity is already subject to oversight by the authority issuing the underlying licence. Concerns were also raised regarding commercial sensitivity, the complexity of extracting information across multiple systems, currencies and payment providers, and the need for clear and consistent reporting methodologies.

Some stakeholders further suggested that any reporting requirement should focus on Malta-facing activity and be limited to high-level aggregate information.

4.3.2 MGA's Position

The Authority acknowledges the practical challenges associated with collecting transactional information and agrees that a proportionate approach is required.

Accordingly, the proposed requirement will apply only to B2C RN holders. Such operators will not be required to provide transaction-level data, customer-level information or exact transactional figures.

Instead, information will be collected using predefined bands and thresholds based on the distribution of active player accounts by reference to aggregate deposit values during the reporting period.

This approach is intended to provide the Authority with a high-level understanding of activity conducted under the RN framework while reducing operational burden and addressing concerns regarding commercial sensitivity.

4.4 Payment Methods

4.4.1 Stakeholder Feedback

Stakeholders generally recognised that information concerning payment methods may be relevant from a risk-assessment perspective and could assist the Authority in understanding emerging trends and risk indicators. Feedback focused primarily on the level of detail requested, the need for standardisation and consistency across operators, and ensuring that any reporting expectations remain practical to implement.

4.4.2 MGA's Position

The Authority intends to proceed with a high-level payment method reporting requirement for B2C RN holders.

The requirement will focus on the percentage distribution of deposits across standardised payment method categories rather than individual transactions, provider-level information, aggregate deposit values or customer-level data.

To promote consistency and comparability across operators, the Authority will develop standardised payment method categories aligned, where practicable, with existing MGA reporting structures. Where necessary, alternative classifications may be accepted, provided they are appropriately documented and can be reasonably mapped to the relevant categories.

Reporting will be based on percentage allocations across payment method categories rather than exact deposit values, thereby reducing operational burden and addressing concerns regarding commercial sensitivity.

4.5 Employees and Revenue

4.5.1 Stakeholder Feedback

Stakeholders highlighted the practical challenges associated with attributing employees and revenue to a specific licence or activity, particularly where shared-service and group operating models are utilised. Respondents noted that employees frequently support multiple entities, licences, brands and jurisdictions, whilst revenue may be recognised, recorded or allocated across different entities, products, licences and markets.

Stakeholders therefore emphasised the need for clear guidance on the reporting perimeter and the allocation methodologies that may be applied. Several respondents also questioned the relevance and proportionality of requiring exact licence-specific revenue figures, particularly where such information is commercially sensitive, cannot be directly attributed without applying assumptions, or is already subject to oversight by the authority that issued the underlying licence.

4.5.2 MGA's Position

The Authority acknowledges the practical challenges associated with attributing employees and revenue to a specific foreign licence, particularly within shared-service, group and multi-jurisdictional operating models.

Accordingly, the revised approach focuses on obtaining proportionate information regarding the operational and economic footprint and relative scale of RN-related activity. Where direct attribution is not possible, the Authority will permit reasonable and consistently applied allocation methodologies, provided that the basis for the allocation can be explained and justified upon request.

In relation to employees, the Authority will focus on Malta-based full-time equivalent employees supporting activities conducted under the RN framework. Where employees support both RN and non-RN activities, or support multiple entities or authorisations, respondents may apply a reasonable and consistently applied allocation methodology. Such methodologies should as much as possible avoid double counting and be capable of being explained and justified to the Authority upon request.

In relation to revenue, the Authority recognises that revenue may not always be directly attributable to RN-related activity and may be recognised, recorded or allocated across multiple entities, products, licences or jurisdictions. Where direct attribution is not possible, respondents may apply a reasonable and consistently applied allocation methodology.

To address concerns regarding proportionality and commercial sensitivity, respondents will be required to select the applicable revenue band rather than provide an exact revenue figure. The appropriate revenue measure will depend on the nature of the RN activity, with B2C RN holders reporting gaming revenue and B2B RN holders reporting revenue determined in accordance with the accounting principles and standards applicable to the RN holder.

The objective is to enable the Authority to better understand the operational presence, substance, economic footprint and relative scale of RN-related activity in Malta, without requiring artificial precision where employees or revenue cannot be directly attributed to RN-related activity.

Further guidance will be provided on the treatment of shared-service arrangements, employees supporting multiple entities or authorisations, revenue attribution, outsourced functions and acceptable allocation methodologies.

4.6 Reporting Implementation Timelines

4.6.1 Stakeholder Feedback

Stakeholders highlighted the potential operational impact of the proposed requirements, including additional compliance effort, implementation costs and potential overlap with existing reporting obligations. Respondents emphasised the importance of providing adequate implementation time, adopting a phased approach and ensuring alignment with existing reporting cycles where possible.

Several respondents noted that the beginning of the year is typically associated with significant reporting obligations across multiple regulatory frameworks and suggested that any annual reporting exercise should allow sufficient time for data gathering, reconciliation and internal review. Respondents also favoured alignment with existing renewal or reporting processes where practicable and supported a lighter-touch approach where there had been no material changes since the previous submission.

4.6.2 MGA's Position

The Authority recognises the importance of implementation timing and does not intend to introduce all revised requirements simultaneously. Instead, the enhanced framework will be implemented through a

phased approach, allowing RN holders sufficient time to adapt to new obligations while enabling the MGA to refine guidance, reporting methodologies and operational arrangements where necessary.

The Authority also acknowledges the operational considerations raised by stakeholders regarding reporting timelines, potential overlap with existing regulatory obligations, and the time required to gather, reconcile and review information prior to submission. Accordingly, the MGA will seek, where practicable, to align any annual information-gathering exercise with existing reporting cycles in order to minimise duplication and operational burden, whilst avoiding periods that are already reporting intensive.

At this stage, it is envisaged that the annual information return will be aligned with the September Industry Performance Return (IPR) submission cycle, with which licensees are already familiar. Unless otherwise specified by the Authority, the reporting period will cover the full calendar year preceding the year of submission. For example, an annual information return submitted by September 2027 would cover the period from 1 January 2026 to 31 December 2026.

The Authority further agrees that a proportionate approach should be adopted where there have been no material changes to previously submitted information and will take this into account when developing the final reporting framework. As a general principle, RN holders will be expected to complete any annual information-gathering exercise introduced under the revised framework. However, where the Authority considers that a risk-based approach is appropriate, having regard to the RN holder's risk profile and the information already available to the MGA, certain RN holders may be exempted from completing the annual questionnaire. In such circumstances, the RN holder may instead be required to submit a declaration confirming that no material changes have occurred since the previous submission. Any decision to apply such an approach will be made by the Authority on a risk-based basis and communicated to the relevant RN holder in advance.

The first annual information-gathering exercise under the revised framework will be launched in 2026 and will apply solely to B2C RN holders. The exercise will cover the reporting period from 1 January 2025 to 31 December 2025. B2B RN holders will be brought within scope of the annual reporting framework in the subsequent reporting cycle. This phased implementation is intended to support an orderly transition, provide stakeholders with adequate time to adapt to the new requirements, and allow the Authority to refine guidance, reporting methodologies and operational processes before extending the framework to B2B RN holders.

Further details regarding implementation timelines, reporting periods and any transitional arrangements will be communicated ahead of implementation.

4.7 Practical Implementation Challenges

4.7.1 Stakeholder Feedback

Stakeholders raised concerns regarding the practical implementation of the proposed reporting requirements, particularly where RN holders operate under multiple licences, across several jurisdictions or within group structures. Respondents noted that certain information may be maintained at corporate or group level and may not be readily segregated by individual licence or activity. This may particularly affect information such as employee numbers and revenue, where shared-service or group operating models are used. Stakeholders therefore requested clarity regarding the applicable reporting perimeter and flexibility where information cannot be directly attributed to RN-related activity.

4.7.2 MGA's Position

The Authority acknowledges that RN holders may operate through multi-licence, multi-jurisdictional or group structures and that certain information may be maintained at corporate or group level rather than being readily available by individual licence or activity.

The applicable reporting basis will depend on the nature of the information requested. Where information relevant to RN-related activity cannot be directly attributed due to the manner in which an RN holder's operations or reporting systems are structured, a reasonable and consistently applied allocation methodology may be used, where appropriate.

The revised reporting requirements and supporting guidance will specify the applicable reporting basis for the relevant information requested, including where information maintained at entity, corporate or group level may be used or appropriately allocated.

The MGA will continue to assess the effectiveness of the information collected and may, where justified by supervisory, regulatory or risk considerations, refine the reporting requirements in future. Any such refinements would be subject to further evaluation and supported by appropriate guidance

5 The Way Forward

The Authority would like to thank all stakeholders who participated in the consultation process and for the constructive and thoughtful feedback provided. The feedback has played an important role in refining the proposed enhancements and ensuring that the revised framework remains proportionate, practical and aligned with its intended objectives.

As set out in this feedback statement, the Authority has reconsidered and refined a number of its original proposals to address concerns relating to proportionality, operational implementation, commercial sensitivity and potential duplication with the oversight exercised by foreign licensing authorities. The final framework will therefore adopt a more differentiated approach between B2B and B2C RN holders, place greater emphasis on risk-based engagement, and rely on targeted information gathering that supports clearly defined regulatory, policy and risk-assessment objectives.

The Authority will now proceed with the implementation of the revised RN framework and will publish the necessary amendments, guidance materials, reporting templates and supporting documentation, as required. Particular focus will be placed on providing clarity regarding reporting methodologies, definitions, reporting periods and submission requirements to facilitate consistent application across the RN population.

The Authority also recognises that certain information and documentation requirements forming part of the revised framework, particularly those relating to ownership, control and other onboarding-related information, may not have been collected in the past by the Authority. While these requirements will apply to new applicants as part of the onboarding process, any collection of equivalent information from existing RN holders will be undertaken progressively and on a risk-based basis. The Authority does not intend to require all existing RN holders to provide the full suite of information simultaneously. Instead, a phased approach will be adopted to address historical information gaps while minimising unnecessary operational burden. Appropriate guidance and implementation support will be provided to applicants and RN holders throughout the transition process.

The first implementation milestone under the revised framework will be the launch of the annual information-gathering exercise in 2026. This exercise will apply solely to B2C RN holders and will cover the reporting period from 1 January 2025 to 31 December 2025. The exercise will enable the Authority to assess the effectiveness of the revised framework, evaluate the quality and usefulness of the information collected, and identify any areas where further refinements may be required. B2B RN holders will be brought within scope of the annual reporting framework in the subsequent reporting cycle.

The Authority will continue to engage with stakeholders, monitor the operation of the revised framework and assess whether further adjustments are necessary in light of practical implementation experience, emerging risks, evolving industry structures and regulatory developments. The MGA remains committed to maintaining an RN framework that supports effective oversight, regulatory cooperation and informed decision-making while remaining proportionate, risk-based and responsive to the realities of the sectors and operators it serves.

