

**Follow-up Committee on Manipulation of
Sports competitions
(T-MC)**

Council of Europe Convention on the
Manipulation of Sports Competitions
(CETS No. 215)



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Guidelines on the fight against illegal betting and the typology of betting operators

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INTRODUCTION

1. Safeguarding sport integrity through the Macolin Convention

The primary objective of the Macolin Convention is to protect the integrity of sport.

To achieve this, and to prevent criminal infiltration into sports competitions, the Convention encourages States to adopt effective measures to combat illegal betting and to ensure proper oversight of the sports betting market.

2. The Macolin Convention urges action against illegal betting

Article 11¹ of the Macolin Convention calls on countries to explore the most appropriate means to fight against illegal sports betting. This includes that Parties shall consider adopting measures such as shutting down illegal operators², blocking financial transactions, and banning advertising for illegal platforms. Public awareness campaigns should also inform citizens about the risks linked to illegal betting, such as fraud and sport competitions manipulation.

3. Combating illegal betting requires international cooperation

National efforts are not enough. Tackling illegal betting effectively requires strong international coordination. To make this cooperation possible, countries must agree on a shared definition of what constitutes illegal betting. Without such a common understanding, legal gaps and inconsistent enforcement create openings that criminal networks are well-positioned to take advantage of.

The Macolin Convention addresses this need by offering a common legal definition. Illegal sports betting is defined as any betting activity not authorised under the laws of the country where the person placing the bet is located. This includes any bets made with operators that are not licensed or allowed to operate in that jurisdiction.

4. Building a stronger global response to illegal betting and organised crime

At the November 2023 Macolin [Conference in Rabat](#) organised by the Council of Europe, participants reaffirmed the need for a coordinated international response to illegal betting and its links to organised crime. Building on the existing definition provided by the Macolin Convention, they called for a clear typology to distinguish between legal and illegal operators.

The discussions also underlined the importance of engaging public authorities, increasing transparency around operator ownership, addressing money laundering risks, and improving methods to assess the scale of the illegal betting market. Sharing best practices and developing innovative tools were identified as key strategies to tackle these evolving threats.

Further operational guidance may support consistent implementation across jurisdictions, while fully preserving the legal scope and meaning of the Convention's definition.

5. Towards practical guidance to classify the betting operators

This document provides guidelines for betting regulators and sports organisations to strengthen coordination in the fight against illegal betting. It proposes clear, simple and practical criteria to help assess whether betting operators comply with relevant regulations on illegal betting and sports integrity standards.

These guidelines aim to support more consistent and effective action across jurisdictions, while respecting national specificities.

WHY IT IS IMPORTANT TO FIGHT AGAINST ILLEGAL BETTING

1. Illegal betting is widely recognised as a criminal offence

Across most jurisdictions, illegal betting is considered a crime. This is not only because it operates outside the law, but also due to its frequent links to organised crime.

¹ See Article 11 of the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention), which calls on each Party to explore appropriate means to combat illegal sports betting. These may include: (a) closure or direct or indirect restriction of access to illegal remote and land-based sports betting operators; (b) blocking of financial flows between illegal operators and consumers; (c) prohibition of advertising for illegal betting services; and (d) raising consumer awareness of the risks associated with illegal sports betting.

² According to Article 3, paragraph 5(a) of the Council of Europe Convention on the Manipulation of Sports Competitions (Macolin Convention), "illegal sports betting" refers to any sports betting activity whose type or operator is not allowed under the applicable law of the jurisdiction where the consumer is located.

Research has demonstrated that, in specific contexts, there is a significant correlation between betting and criminal activity. The Precrimbet report (2017)³ documents highlight how the risk of manipulation linked to betting varies by country, sport, and competition, identifying patterns of exposure ranging from high to extreme. This observation is consistent with other analysis conducted by law-enforcement bodies and regulatory authorities. Similarly, James Banks (Gambling, Crime and Society, 2017)⁴ explores the complex relationship between gambling practices and various forms of criminal behaviour.

When betting is banned or poorly regulated, criminal networks step in, offering illicit alternatives. In countries like the United States⁵, laws explicitly prohibit financial transactions tied to unlicensed betting operations, recognising the danger they pose.

While methodologies differ across sources, the broader evidence base shows convergence: illegal betting markets create conditions that favour criminal infiltration.

2. Sports betting is a lucrative opportunity for organised crime

Of all gambling sectors, sports betting is among the most attractive for criminal groups. Its large volumes of cash flow, potential for money laundering, and high profit margins make it a key target. Since 2000, sports betting has been among the highest-paying forms of gambling, further increasing its appeal to illicit actors.

Criminal organisations make extensive use of illegal betting as a major revenue stream. The Europol 2020 report *The Involvement of Organised Crime Groups⁶ in Sports Corruption* highlights that betting-related match-fixing is perceived by organised crime groups as a high-profit and low-risk activity, with estimated annual criminal proceeds of around €120 million.

The report describes how OCGs invest heavily in this area, especially in illegal betting markets in jurisdictions that offer high liquidity, anonymity, and reduced risk of detection.

3. Illegal betting harms the legal economy and endangers society

Illegal betting is more than a criminal offence. It undermines market fairness and puts consumers at risk. Legal operators face unfair competition from those who operate without oversight or obligation.

Consumers are left unprotected, exposed to fraud, manipulation, and other forms of exploitation. Moreover, illegal betting often serves as an entry point for criminal organisations into the world of sport, enabling match-fixing and financial crime.

4. A fragmented problem that defies easy solutions

Illegal betting takes many forms, ranging from locally operating street bookmakers to betting websites that, although licensed, are established in lightly regulated jurisdictions and operate from abroad. These operators often use foreign licences to target markets in which they are not authorised to operate.

As a result, enforcement is challenging and oversight inconsistent. The lack of a unified international regulatory framework against illegal betting makes it harder to fight effectively.

5. Fighting illegal betting means defending the integrity of sport

Combating illegal betting is essential to protect the integrity of sport. No single country can succeed alone. Global cooperation is necessary, including joint investigations, coordinated action plans, and cross-border information sharing.

Some betting markets, particularly in parts of Asia, continue to fuel corruption and financial crime. Without a united international approach, illegal betting will remain a serious and systemic threat to sport and society.

³ According to the "Precrimbet" report (2017), the risk level of sports manipulation related to betting can be assessed by country, by sport, and by competition, with risk levels ranging from high to extreme, *Preventing Criminal Risks Linked to the Sports Betting Market – Final Report*, IRIS (available [here](#)).

⁴ James Banks, *Gambling, Crime and Society* (London: Palgrave Macmillan, 2017).

⁵ In the United States, several federal statutes make it illegal to operate or engage in financial transactions linked to unlicensed sportsbooks. These include the Wire Act, the Illegal Gambling Business Act, the Travel Act, and the Unlawful Internet Gambling Enforcement Act. In addition to these gambling-specific laws, broader criminal statutes targeting organized crime have also been used to prosecute offshore betting operations.

⁶ Betting-related competition manipulation is not a new phenomenon, but its prevalence has grown significantly in parallel with the expansion of the global sports betting market. This correlation is documented in Europol's 2020 situation report (*The Involvement of Organised Crime Groups in Sports Corruption*), which highlights how modern betting platforms, especially online and live betting, have facilitated the operations of organised crime groups (available [here](#)). Similarly, the UNODC's 2021 report, *Understanding the Manipulation of Sports Competitions*, p. 16, emphasises that the rise of betting-related corruption has closely followed the rapid development of the sports betting sector (available [here](#)).

MEASURES TO FIGHTS ILLEGAL BETTING

1. Regulators' objectives are driven by public interest

Regulator's top priorities include fighting illegal betting, protecting consumers, preventing money laundering, and supervising betting operators. These objectives are widely recognised as core public-interest responsibilities of regulators across jurisdictions.

Other important aims are ensuring fair betting operations, raising money for the state, and preventing criminal involvement and match-fixing. In contrast, economic goals such as making the market more attractive or creating employment are seen as less important for regulatory authorities.

2. Measures implemented by States against illegal betting

The following measures have been implemented by States to combat illegal betting. They are presented here to illustrate the range of tools commonly employed by public authorities:

- **Advertising ban with financial sanctions:** prohibiting promotion of illegal betting platforms and applying financial penalties to perpetrators.
- **ISP blocking of illegal operators:** restricting access to illegal betting websites at the internet service provider level.
- **Payment blocking:** preventing financial transactions between consumers and unauthorised betting operators.
- **Whitelist system:** allowing only approved and licensed operators to offer betting services within a jurisdiction.
- **Injunctions against illegal operators:** taking legal action to stop the activities of specific unauthorised operators.
- **Blacklist system:** publishing a list of banned operators in order to support enforcement action and inform consumers.
- **Blocking through search engines:** removing or downgrading illegal betting sites in search engine results.
- **Advertising ban with no future licence possibility:** preventing operators who advertise illegally from ever obtaining a licence.
- **Injunctions via foreign regulator:** requesting foreign regulatory authorities to take action against illegal operators based in their jurisdiction.

3. Harmonising the classification is key to effective international regulation

Countries apply different listing strategies to regulate betting operators. For example, several countries have established whitelist and blacklist systems, with some using both.

Harmonising the criteria used to define national whitelists and blacklists is key to combating illegal betting more effectively. A shared approach helps close enforcement gaps, avoids inconsistencies between countries, and strengthens international cooperation to protect the integrity of sport.

CRITERIA FOR CLASSIFYING THE BETTING OPERATORS

These criteria aim to help assess where and how betting operators comply with relevant regulations on illegal betting and sports integrity standards.

Classification may be guided by four main criteria: **compliance with national regulations on illegal betting, the level of transparency, participation in an alert system, and compliance with international regulations on sports integrity.**

Together, these criteria help ensure that cooperation is directed only towards trustworthy operators. They also help determine when caution is needed, or when cooperation should be avoided with operators that do not meet minimum legal or integrity standards.

KEY CRITERIA #1 – JURISDICTIONAL COMPLIANCE

This criterion helps classify betting operators into three main categories. The first group includes unlicensed operators that provide services illegally. The second includes operators who are licensed but still offer some bets in jurisdictions where they are not authorised.

Within the second group, a distinction is made between operators with significant illegal activity and those with limited illegal activity. These guidelines do not establish strict quantitative thresholds. They allow each jurisdiction to apply these distinctions in accordance with its regulatory framework and policy priorities.

The third group includes fully licensed operators who only offer bets in jurisdictions where they are legally authorised, commonly referred to as onshore. This distinction is essential to assess risks and decide whether cooperation is appropriate.

Jurisdictional compliance

Category 1	Unlicensed operator: The betting operator holds no licence in any jurisdiction and operates entirely outside the legal framework
Category 2	Licensed operator with significant illegal activity: - The operator holds a licence in at least one jurisdiction but actively targets markets where it is not authorised - Clear indicators include blacklisting by national authorities, website translations unrelated to licensed territories, or sponsorship of events in jurisdictions where it has no licence - The operator does not publish any breakdown of its gross win by jurisdiction
Category 3	Licensed operator with limited illegal activity: The operator is licensed in most jurisdictions where it offers bets. It publishes a detailed breakdown of its gross win by jurisdiction, demonstrating that illegal activity represents only a small portion of its total revenue
Category 4	Fully compliant licensed operator: - The operator is licensed and authorised in all jurisdictions where it operates - It provides a detailed breakdown of its gross win by jurisdiction, confirming that 100% of its activity is legal.

KEY CRITERIA #2 – LEVEL OF TRANSPARENCY

This criterion helps to classify betting operators based on their level of transparency. Key elements include the publication of annual reports or at least audited financial indicators, the disclosure of gross win by jurisdiction, and the identification of the company's beneficial owners.

These indicators allow regulators to assess the operator's credibility, legal compliance, and commitment to integrity.

Level of transparency

Category 1	Low level of transparency: - The betting operator does not publish its annual accounts and does not provide audited key indicators. A minimum of five indicators should be expected: gross win, payout, EBITDA, betting taxes or duties, and licences by jurisdiction - The beneficial owners of the operator are not clearly identified or disclosed
Category 2	Significant level of transparency: - The betting operator publishes its annual accounts each year, or at minimum, provides audited key indicators, including at least the following: gross win, payout, EBITDA, betting taxes or duties, and licences by jurisdiction - The beneficial owners of the operator are fully identified and publicly known

KEY CRITERIA #3 – ALERTS SYSTEM MEMBERSHIP

This criterion helps assess whether a betting operator is actively contributing to the detection of suspicious activity. It checks whether the operator is a member of an alert or monitoring platform, such as ULIS or IBIA, and whether it shares information on irregular or suspicious betting patterns with relevant stakeholders (e.g. being a member of the OM Unit PMC's IBIS platform).

In several jurisdictions, this type of cooperation is a requirement set by betting regulatory authorities.

Alerts system membership

Category 1	Non-member: The betting operator is not affiliated with any recognised alert or monitoring platform
Category 2	Limited transparency member:

- The betting operator is a member of an alert or monitoring platform whose monitoring platform does not consistently publish information about its reporting activity (e.g. number of alerts, activity reports, membership)

Category 3

Full transparency member:

- The betting operator is a member of an international alert or monitoring platform
- The monitoring platform publicly discloses information about its operators' reporting activity
- The operator membership is publicly available
- The integrity monitoring body has safeguards to prevent perceived or actual conflicts of interest
- The operator is part of an integrity monitoring body that may be licensed or approved by a regulatory authority where such regimes exist

Cooperation between betting operators and international integrity monitoring networks plays a role in identifying suspicious activity and can support risk-based regulatory approaches.

However, monitoring bodies differ in their levels of transparency, disclosure practices, and governance safeguards. In some cases, limited publicly available information may make it difficult for authorities to verify an operator's actual participation.

This criterion therefore distinguishes between different levels of transparency and cooperation, without taking a position on the regulatory or commercial model of each monitoring body.

KEY CRITERIA #4 – INTERNATIONAL STANDARD COMPLIANCE

This criterion helps assess the extent to which a betting operator complies with international standards to prevent the manipulation of sports competitions. The main point of reference for this assessment is the Macolin Convention, which is the only legally binding international instrument in this field.

The Conventions provides a set of principles on preventing conflict of interest, avoiding the misuse of privileged information, and ensuring that commercial or organisational relationships do not compromise the integrity of competitions.

The criterion considers whether the operator aligns with the principles of the Convention and actively contributes to the prevention and detection of manipulation in sport.

International standard compliance

Category 1

Not compliant:

- The betting operator has no designated staff responsible for sport integrity
- It may also sponsor a sport event or team in a country where it does not hold an explicit licence or authorisation to operate
- It has no internal procedures addressing conflicts of interest or the misuse of privileged information

Category 2

Partially compliant:

- The operator has appointed a staff member responsible for sport integrity, acting as a Single Point of Contact for the Macolin community
- It does not sponsor any sport events or teams in countries where it lacks an explicit authorisation to operate
- Some internal rules exist, but procedures to prevent conflicts of interest or the misuse of privileged information remain incomplete or inconsistently applied
- Cooperation with relevant authorities or national platforms is occasional but not systematic

Category 3

Significantly compliant:

- The operator has a designated sport integrity officer (Single Point of Contact for the Macolin community)
- It does not sponsor events or teams in countries where it is not explicitly authorised
- It can demonstrate that it refrains from offering bets where the risk of manipulation is high or extreme, in line with national rules or relevant guidelines such as those from the Macolin Follow-up Committee
- It uses payment systems that allow financial flows above a certain threshold to be traceable
- It ensures that natural or legal persons involved in offering sports betting products are not allowed to bet on their own products
- It refrains from offering bets on competitions where it has control over the organiser or key stakeholders, such as clubs
- It contributes to sport or sport integrity initiatives beyond traditional sponsorship activities

CLASSIFICATION OF BETTING OPERATORS

The proposed classification outlines five types of betting operators, each reflecting a different level of reliability in relation to the standards of the Macolin Convention.

	Indicator #1 Jurisdictional compliance	Indicator #2 Level of transparency	Indicator #3 Alert system membership	Indicator #4 International standard compliance	Status
Type 1	Fully compliant licenced operator	Significant level of transparency	Full transparency member	Significantly compliant	Trusted operator
Type 2	Licensed operator with limited illegal activity	Significant level of transparency	Full transparency member	Partially compliant	Cooperative operator
Type 3	Licensed operator with significant illegal activity	Significant level of transparency	Limited transparency member	Partially compliant	Cautioned operator
Type 4	Licensed operator with significant illegal activity	Low level of transparency	Non-member	Not compliant	Restricted operator
Type 5	Unlicensed operator	Low level of transparency	Non-member	Not compliant	Excluded operator

This classification is designed as a practical tool to support regulators and sports organisations in assessing operators' compliance with integrity standards. It provides a structured framework that can be adapted to national contexts and complemented with additional criteria where appropriate. Its purpose is not to impose a uniform model but to facilitate consistent, transparent decision-making based on the key principles of the Macolin Convention.

CONCLUSION

The Follow-up Committee encourages States Parties and relevant betting regulators to:

- Adopt a classification system based on clear, objective criteria to distinguish between betting operators according to their level of compliance with sports integrity standards.
- Not awarding licences to betting operators not compliant with relevant regulations on illegal betting and sports integrity standards.

This approach should complement existing risk-based regulation of the betting offer by considering key factors such as the operator's legal status, territorial compliance, transparency, and cooperation with integrity monitoring systems.

Such a classification would strengthen efforts to combat illegal betting and help ensure that cooperation is limited to operators that contribute to the protection of sport integrity, in line with the principles of the Macolin Convention.