GRAI Quarterly Returns — Frequently Asked Questions (FAQ)

Last Update: 03 November 2026

Submission Timelines & Scope

Q: Are the 14 days provided to submit the quarterly return calculated as calendar days or working days?

A: The 14-day submission period refers to calendar days. Where a period of time is expressed to begin or end on a particular day, that day is deemed included in the timeframe. **However, per the notice dated 4 November 2026, the period for compliance has been extended and is now on or before the 1 December 2026**

Q: Our licence was issued partway through the quarter. What specific period should our return cover?

A: The regulatory return should report on the official quarterly period (e.g., Q3: 1 July 00:00:00.00 UTC to 30 September 23:59:59.99 UTC).

- While obligations under the Act apply only from your licence issue date, licensees are encouraged to provide data for the full specified quarter to give the GRAI a more complete view of activities.
  If your licence was granted *after* the specific quarter has already concluded, you are not required to submit a return for that quarter.

Q: Our historical data pre-dates our licence issuance. Do we need to flag these metrics differently?

A: No. There is no requirement to explicitly flag data points or historical active account metrics as "pre-licence" within the submission.

Q: My relevant officer application is still pending portal review. How can I access the submission page?

A: Only the registered Account Holder can access and submit Quarterly Returns through the operator portal. You must coordinate directly with your organisation's Account Holder to arrange your submission.

Account Limits & Reporting Logic

Q: How should we standardise daily, weekly, or monthly customer limits for the "pro-rata per week" calculations?

A: To standardise your calculation metrics, the following rules apply:

- **Monthly Limits:** Always divide the monthly threshold by 4 to establish the weekly pro-rata limit.
- **Arbitrary Day Limits (e.g., 8 days):** Divide the limit by the specified days to find the daily value, then multiply by 7 (e.g., (€120 / 8 days) x 7 = €105 weekly pro-rata).
- **Daily Limits:** Multiply the daily ceiling by 7 to determine the weekly pro-rata equivalent.

Q: If a customer account has multiple concurrent limits set (e.g., a daily and a monthly limit), how is this calculated?

A: A unique customer account is counted as one single account. If an account has multiple overlapping monetary limits in place, you must **use the most restrictive limit** (the limit yielding the smallest weekly allowance) and count it as one single limit for the purpose of the overall calculation.

Example Calculation:

- **Customer A** sets a €20 daily limit (€140/wk equivalent) and a €400 monthly limit (€100/wk equivalent). *Selection: €100/wk (Most restrictive).*
- **Customer B** sets a €50 weekly limit. *Selection: €50/wk.*
- **Calculation:** (€100 + €50) / 2 unique accounts = **Average Customer Account Limit of €75**.

Q: Are standard sports betting tables and in-play sports tables mutually exclusive?

A: Yes. Pre-event sports wagering metrics and live, in-play sports betting metrics are entirely exclusive categories. In-play figures should not duplicate or bleed into pre-match metric

Self-Exclusion & Closed Accounts

Q: Does the metric for "returning customer accounts following self-exclusion" track passive or active returns?

A: This metric explicitly tracks active returns. It measures the total number of accounts whose self-exclusion period ended **AND** who have actively staked a bet during the reporting quarter. It does not include passive returns where an exclusion expired but no wagering activity occurred.

Q: What circumstances apply to "funds awaiting refund due to account closures at the end of the quarter"?

A: This field captures funds belonging to fully closed accounts—not suspended accounts—that the licensee has been unable to successfully return. If your system automatically flushes or auto-cashes out remaining balances immediately upon closure, your figure should be "0".

Typical use cases for pending refunds include:

- The customer deposited via a debit card that has since expired, been cancelled, or replaced.
- The customer closed the linked bank account or e-wallet.
- The deposit was made via cash or prepaid vouchers with no financial destination details saved.
- The account holder is deceased and funds are frozen pending legal probate.

Stakes & Bonus Funds

Q: Should stakes be reported on a "placed" or a "settled" bet basis?

A: Stakes must be reported on a placed bet basis. This means capturing all aggregate monetary value committed by players to place bets during the reporting quarter, regardless of the ultimate settlement date.

Q: What should be included or excluded when calculating the "Total Value of Stakes"?

A:

- **Includes:** Re-staked winnings, stakes funded by settled balances, and credited cash equivalents.
- **Excludes:** Account deposits that have not yet been placed on a wager, unredeemed bonus balances, and cancelled or voided bets.

Q: How should customer bonus funds and free bets be treated?

A:

- **Exclude:** Bonus funds or free bets that carry no monetary alternative or cash equivalent. Un-staked bonus balances should also be omitted.
- **Include:** Bonus funds issued as cash equivalents that can be fully withdrawn by the customer but have instead been staked as cash (e.g., a "money back as cash" promotion that has been re-staked).

Q: For multi-product platforms with a shared wallet (e.g., Sportsbook and out-of-scope Casino), how should shared figures be declared?

A: You must report total deposits and withdrawals in full. However, if a customer account can be verified as being utilized *solely* for the out-of-scope product (e.g., Casino), that specific account's deposits and withdrawals should be excluded from the totals to the best of your ability.