The domestic agent bears responsibility for discharging the foreign provider's statutory obligations under the GIPA and the PIPA, including submission of reports to authorities and compliance with labeling and disclosure requirements for game products, such as ratings, content descriptors, and loot-box probability information. Crucially, GIPA violations committed by the domestic agent in performing these functions are imputed directly to the foreign provider. Failure to designate a required local agent exposes providers to administrative fines of up to KRW 20 million per year.

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In Spain, the starting point is that blockchain is legally neutral: a game only becomes "gambling" if it fits the generic definition of juego de azar in Law 13/2011, regardless of whether it runs on-chain or off chain.

Article 3 of Law 13/2011 defines juego as any activity where players (i) risk money or other economically valuable items, (ii) on future, uncertain results that depend at least partly on chance, and (iii) where prizes can be transferred between participants. The DGOJ has distilled this into three cumulative elements for the law to apply: payment to participate, randomness in determining the result, and a prize that is transferred to the winning participant. If those conditions are met and the activity targets Spain on a state wide basis, it is gambling and requires a licence; any non regulated modality is directly prohibited.

From the perspective of Law 13/2011 it is irrelevant whether the value involved is euros, in game currency, fungible tokens or NFTs: as soon as the asset is economically valuable and transferable, it will typically qualify as an "objeto económicamente evaluable". Accordingly, a Web3 game that requires players to pay in cryptoassets or game tokens to access randomised mechanics and offers tradable tokens or NFTs as rewards can still fall squarely under the Spanish definition of gambling, provided the cumulative elements of payment, chance and prize are met.

Loot boxes are the natural bridge between "classic" gambling and Web3. In its 2021–22 consultation on mecanismos aleatorios de recompensa, the DGOJ explicitly applied Law 13/2011 to loot boxes whose operation, from design to actual use, meets the statutory concept of game of chance. It then spelt out three parameters for when a loot box becomes gambling: (1) paid activation (the box must be purchased or opened for consideration, distinct from the base game), (2) random allocation of contents (the reward is future, uncertain and depends on chance), and (3) a prize that is economically evaluable and monetisable, meaning there are mechanisms inside or outside the game to convert the virtual reward into legal tender. Whether the reward is cosmetic or gives competitive advantage is irrelevant if it can ultimately be monetised.

Web3 design tends to intensify this third limb. Open secondary markets for tokens and NFTs, on chain trading and P2P swaps make it much easier to show that rewards are economically valuable and transferable in practice. A blockchain game that sells loot crates for crypto, allocates randomised NFT or token rewards, and allows or tolerates secondary trading will often satisfy the Spanish definition of gambling, even if the developer never labels it as such.

In parallel, the (still pending) Organic Law on the protection of minors in digital environments introduces a dedicated regime for mecanismos aleatorios de recompensa: it proposes a general ban on minors accessing or activating mechanisms that involve payment, chance and rewards that can be exchanged for money or other virtual objects, precisely because of their similarity to regulated gambling products. This reinforces the direction of travel: in Spain, Web3 loot boxes with tradable rewards are treated as functionally close to gambling, even where a bespoke minors protection regime is layered on top of or alongside Law 13/2011.

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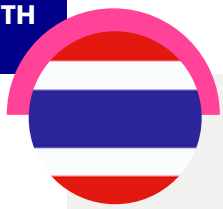

Thailand maintains one of the most restrictive gambling regimes in the region, primarily governed by the Gambling Act B.E. 2478 (1935). The Act broadly prohibits "gaming for stakes," subject to limited statutory exceptions, and enforcement remains active despite the law's age.

Under Thai law, gambling is generally understood to involve three core elements:

1. Consideration, where the player provides money, property, or something of value to participate;
2. Chance, where the outcome is determined wholly or predominantly by chance rather than skill; and
3. Prizes, where the player stands to win money, property, or something of value.

Blockchain games may raise gambling concerns where tokenised mechanics replicate these elements. Examples include loot boxes with real-world value, chance-based NFT minting with secondary market liquidity, or wagering tokens on uncertain in-game outcomes.

Thai authorities do not recognise a formal distinction between "gaming" and "gambling" akin to that found in some common law jurisdictions. As a result, the presence of skill does not automatically exempt a game from being classified as gambling, particularly where chance materially influences outcomes and prizes have transferable economic value.