

# #GameChanger

The definitive monthly digest of policies, ideas, updates, and events

## What's Inside?

**Junglee Games Co-Founder's clarion call for a responsible future**

**Illegal betting - gambling woes pre-occupy India's policymakers**

**IN PICS: EGF's Ethical Gaming for a Viksit Bharat**

**Legal academic uncovers the reality of the China model**



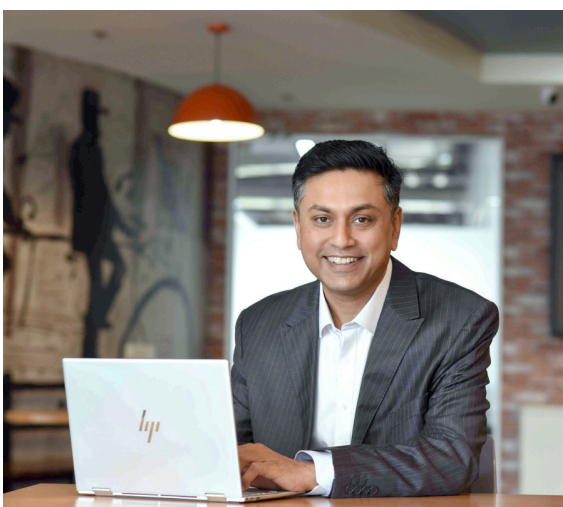
# CEO's Desk

**Building trust is vital for fostering responsible growth and strong stakeholder relationships in gaming.**

As CEO of the E-Gaming Federation (EGF), I'm excited to introduce our inaugural EGF newsletter, with its first issue dedicated to Trust and Safety—two values that are the cornerstone of the online gaming industry. Trust isn't just a principle; it's the foundation of every meaningful relationship we build. In a rapidly expanding sector like online gaming, projected to outpace cinema and music, trust connects us to our consumers and stakeholders, ensuring a path of responsible and sustainable growth.

India has already emerged as a powerhouse in the global gaming landscape, boasting over 500 million gamers, with 200 million willing to invest in enhancing their gaming experiences. Our industry is pioneering new technologies such as AI and ML, positioning India as a leader in gaming innovation. But for our country to truly stand out on the global stage, we must prioritize policies that foster growth while rigorously protecting consumer rights and national interests.

This newsletter is our way of reinforcing that commitment, providing insights on industry trends, policy updates, and the initiatives we're taking to strengthen the ecosystem. Until comprehensive regulations are in place, our EGF Code of Conduct upholds the highest standards, setting a benchmark for responsible operators and ensuring that trust remains at the heart of the gaming industry in India.



**Anuraag Saxena,  
Chief Executive Officer,  
E-Gaming Federation**

Through this platform, we aim to keep you informed about our journey toward a transparent, secure, and thriving gaming environment. My thanks to our members for their dedication to these principles—they are our foundation, compass, and future. Together, we're building a legacy of trust, responsibility, and integrity in gaming, paving the way for an industry that supports innovation while upholding the highest standards of consumer and national well-being.

# #GameChanger Policy

## 1 | ASCI Report

According to Half-Yearly Complaint report (April - September 2024) of the Advertising Standards Council of India (ASCI) illegal betting and gambling ads continue to be ranked as the second most prominent offender proliferating digital media in new formats. In response, the Advertising Standards Council of India (ASCI) referred 890 such ads to the Ministry of Information and Broadcasting (MIB) for further action.

## 2 | Stricter surveillance by MHA

The Ministry of Home Affairs is actively monitoring illegal Chinese gambling companies that are disguised as legitimate Real Money Gaming (RMG) companies in India. The Ministry of Electronics and Information Technology (MeitY) has been rigorously banning these Chinese apps and websites, but they continue to resurface under new identities.

## 3 | Offshore GST leakage concerns

Flagging a red signal against the illegal offshore betting and gambling platforms operating in the country, India's apex GST intelligence wing, the Directorate General of GST Intelligence (DGGI) highlighted the concerns and action taken against these platforms.

## 4 | National Centre of Excellence

The Union Cabinet chaired by the Prime Minister Shri Narendra Modi has approved the establishment of the National Centre of Excellence (NCoE) for Animation, Visual Effects, Gaming, Comics and Extended Reality (AVGC-XR). The NCoE is in pursuance to the Union Minister for Finance and Corporate Affairs' budget announcement for 2022-23 for setting up of an AVGC Task Force in the country.

# #GameChanger Business

## 1 | India's Gaming Market Surges

India's gaming market, as per Treelife's latest report, now stands at 568 million gamers, reinforcing its position as the world's second-largest. The report titled, "Power Play: A Regulatory Guide for Indian Gaming Companies" delves into the intricate dynamics of the gaming industry's evolving landscape.

## 2 | Indian Gaming Industry to be ₹66,000 Cr

India's gaming industry is set to reach ₹66,000 crore by 2028, doubling its current value of ₹33,000 crore, according to Lumikai's report. With a 16% CAGR, growth is driven by smartphone use, affordable data, rising investments and a focus on innovation, positioning India as a global gaming hub.

## 3 | Online Gaming GST Surges 412%

Addressing a press conference about the 54th GST Council meeting, Union Finance Minister Nirmala Sitharaman, said that the revenues from GST on online gaming, casinos, and horse racing, surged to 412% to ₹6,909 crore.

## 4 | RMG Thrives in Economic Uncertainty

Despite economic challenges, India's real-money games sector flourishes, with significant growth projections, job creation, and revenue contributions, defying economic downturns.

# #GameChanger Impact

## 1 | India Ideas Conclave 2024

EGF participated at the India Ideas Conclave 2024 with a panel discussion titled, "Future Tech and Gaming: Can Bharat Afford to Miss the Fourth Wave of Tech-Dominance?". The panel delved into the future of the gaming industry, exploring the transformative role of emerging technologies while emphasizing India's growing youth population as both a unique customer base and a reservoir of untapped talent.

## 2 | Regional Media Roundtables

The E-Gaming Federation hosted regional media roundtables in cities like Lucknow, Patna, Ahmedabad, and Hyderabad to raise awareness and foster informed discussions on key issues in the Indian online gaming industry. These forums aim to distinguish online gaming, promote responsible gaming practices, and emphasize the sector's contributions to employment, growth, and technological innovation.

## 3 | Audits of EGF Member Companies

Grant Thornton conducted audits of five gaming companies based on EGF's Code of Conduct, ensuring compliance with industry standards. The audits aimed to promote responsible gaming practices and enhance regulatory adherence within the industry.

## 4 | Webinar on Gambling Risks

The Centre for Knowledge Sovereignty webinar titled "Gambling Away India's Sovereignty" focused on the growing concerns surrounding illegal online gambling and its implications for India's sovereignty. Mr. Vineet Goenka, discussed how unregulated gambling platforms pose risks to national security, economic stability, and consumer protection. The session highlighted the need for robust regulatory frameworks to safeguard India's interests.

# #GameChanger Events

## **EGF Manthan - Create in India: Games as a Source of India's Soft Power**

The event brought together policymakers, industry leaders, and thought leaders to discuss the gaming industry's role in India's creative economy and global influence. Esteemed speaker Mr. Gautam Chikermane, Vice President, Observer Research Foundation, highlighted gaming's potential as a cultural ambassador. The panel discussion explored the intersection of policy, technology, and creativity to position India as a global gaming hub.



**L to R: Mr. Gautam Chikermane and Mr. Anuraag Saxena**

**L to R: Mr. Gautam Chikermane, Miss Anurima Sharma, Mr. Armstrong Pame and Mr. Anuraag Saxena**

## **Event on 'Ethical Gaming for Vibrant Bharat'**

The event was organized on the sidelines of EGF Code of Conduct audit for its member companies. The event featured the launch of GT's insightful report, 'Guardians of Safe Play: Ethical Gaming for Vibrant Bharat.' An award ceremony was also held to honor member companies that successfully passed the Code of Conduct audit, reflecting their commitment to fostering responsible and ethical gaming practices.



**L to R: Mr. Anuraag Saxena, Mr. Bhavin Pandya, Mr. Priyank Kanoongo, Prof. (Dr.) GS Bajpai, Mr. Rakesh Maheshwari, Mr. Bobby Garg and Mr. Shalabh Saxena**

# Year in Review - 2024

## Most notable events in Gaming

### Partnership with MIB



EGF launched City Quest in partnership with the Ministry of Information and Broadcasting (MIB) for the World Audio Visual Entertainment Summit (WAVES) 2025. City Quest is a trump-card-styled card game based on SDGs data from NITI Aayog on India's 56 cities. The app is available on Google Play Store.

**L to R: Mr. Anuraag Saxena, Ms. Jyoti Vij, Ms. Neerja Sekhar, Shri Ashwini Vaishnav, Shri Sanjay Jaju, Shri Dharendra Ojha, and Mr. Biren Ghosh**

### UNICEF Game Changers Coalition



EGF was the only organisation from India to be invited to UNICEF's launch of the Game Changers Coalition (GCC) at the UN's European Headquarters in Geneva. The initiative aims to equip 3 million adolescent girls globally with digital skills for careers in game technology, focusing on bridging the gender gap in the industry.

**L to R: Mr. Shubhrajyoti Bhowmik, Ms. Aditi Singh, Ms. Devhuti Bakshi, and Mr. Rahul Bansal**

### Trust & Safety in Online Gaming



EGF organised a session on "Trust and Safety in Online Gaming: Navigating the Opportunities and Challenges of a Digital Playground" at IIGF 2024. It successfully addressed key issues like user security, regulatory frameworks, and fostering discussions on creating a more secure and safe online gaming environment.

**L to R: Ms. Priyanka Gulati, Ms. Sharmila Ray, Ms. Sunita Mohanty, Ms. Gowree Gokhale and Ms. Devhuti Bakshi**

# #GameChanger Leaders

## Embracing Responsible Gaming: A Guide to Playing Well

To put things into perspective, first we need to understand the scale and responsibility of the Industry. India's online gaming market has seen a meteoric rise, with over 450 million gamers in 2024, a number set to grow exponentially. However, this growth is accompanied by increasing instances of fraud, data breaches, and problem gaming, exacerbated by offshore and unregulated platforms. Gaming operators are not just service providers: they are custodians of player trust, bearing the responsibility to create safe, transparent, and inclusive ecosystems.

Addressing these challenges is both a responsibility and a necessity. Responsible gaming practices must become the cornerstone of sustainable growth, benefiting players, operators, and stakeholders alike. So how do we approach this, and what should a comprehensive responsible gaming framework look like?

### Responsible Gaming Framework

A comprehensive responsible gaming framework should factor in player protection, financial safety, social responsibility, mental health awareness programs, and responsible marketing practices. This framework should comprehensively address the following challenge:

- Protecting vulnerable players, including minors, with robust safeguards and systems and protocols.
- Ensuring the integrity of games to protect against any fraudulent activities on the platform.

”

The Indian online gaming industry is experiencing unprecedented growth, with revenues projected to reach USD 9.2 billion by FY 29 at a CAGR of 20%. This rapid expansion underscores the critical need for robust trust and safety measures to protect players and ensure the industry's sustainable development.



**Kapil Rathee ,**  
**Co-Founder & President,**  
**Junglee Games Pvt Ltd**



# #GameChanger Leaders

- Promoting inclusivity for a diverse, multilingual user base through technological and design innovations.
- Maintaining financial integrity to prevent money laundering and corruption is critical for legal and ethical compliance.
- Enabling players to control and define their spending limits is essential to preventing overspending and encouraging responsible gaming via appropriate awareness programs.
- Moderating content to maintain a safe environment through constant vigilance and robust systems.
- Implementing responsible advertising practices by running ethical campaigns that avoid targeting vulnerable groups.
- We should provide players with access to mental health support, making sure they have access to professional assistance if needed.
- Robust encryption technologies should be used to safeguard player data and protect personal information from any potential breaches.



Dhruva Interactive, India's first gaming studio (1997), developed games like Need for Speed.

So, how do we bring this framework to life?

## Fostering a Culture of Care and Responsibility

At Junglee Games, responsible gaming is more than just some practices we follow: it is our commitment to the millions of players who turn to online gaming for healthy entertainment, connection, and showcasing their skills. We are committed to defining and setting the gold standard for responsible gaming in collaboration with the industry and policymakers.

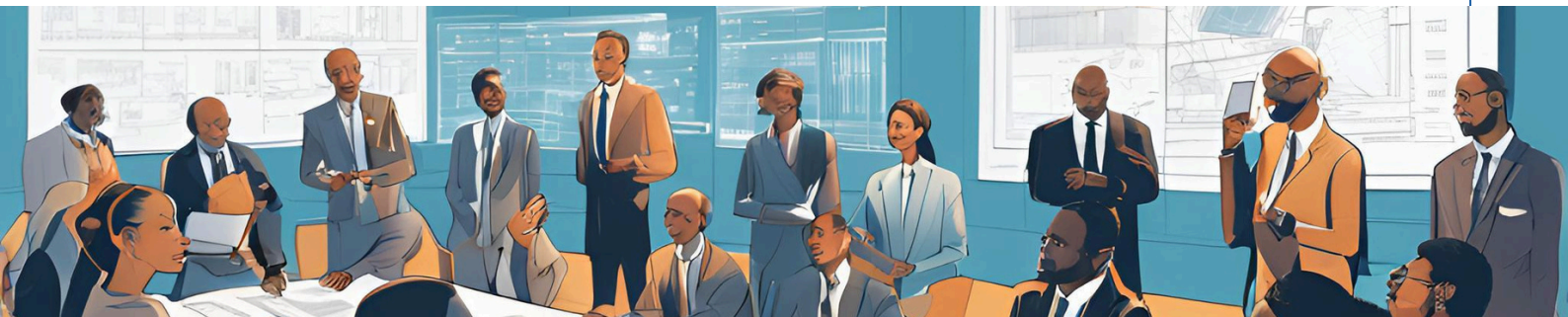
We recognize that trust is the foundation of a thriving gaming community. We have embraced a proactive, tech-driven approach to responsible gaming. By leveraging behavioural analytics, we identify patterns indicative of overindulgence or over-

# #GameChanger Leaders

spending. Our self-assessment tools allow players to evaluate their gaming habits, while features like spending limits and cool-off periods empower them to make conscious choices. Additionally, we have partnered with mental health experts offering resources that empower players to take responsibility for their actions, creating a healthier gaming culture overall.

We go beyond just offering tools: we embed responsible gaming principles into the core of our business success where we relentlessly measure our users' awareness about responsible gaming practices and their interactions with these responsible gaming tools while we continue to build adoption on these proactively.

We have invested in state-of-the-art fraud detection technologies, implemented robust identity verification systems (KYC), and enforced strict anti-cheating policies. Finally, we follow responsible advertising practices, ensuring we do not target vulnerable audiences. Our commitment to data privacy is unwavering: we use advanced encryption to safeguard user information, ensuring a secure and trustworthy gaming experience for all.



## **A Call to Action for the Industry and Government**

The Indian online gaming sector stands at a crossroads. By championing responsible gaming practices, we can transform the industry into a benchmark for trust, safety, and innovation.

While gaming companies are making strides individually, collective efforts are essential for a long-term impact. Industry stakeholders must unite to establish baseline standards, including platform whitelisting and data-backed distinctions between games of skill and games of chance/luck. Policymakers can play a pivotal role by aligning national regulations with global best practices, fostering a consistent and fair gaming environment.

The future of gaming is not just about technology or revenue: it's about creating a culture of care and accountability. Let's lead the way.

# #GameChanger Ideas



”  
**Hon'ble Prime Minister Shri Narendra Modi's Independence Day address holds significance for game developers in the country. PM said, "I am seeing a big market that has come up in the field of gaming, but even today, the gaming world has a big foreign impact in terms of producing the games and earning revenues. India has a big heritage in the area and we can bring lots of new talent to the world of gaming."**

”  
**Post the 54th GST Council meet, Union Finance Minister Smt. Nirmala Sitharaman said, "the revenue from online gaming increased 412% at Rs 6,909 crore in six months (October 2023 until March 2024)."**



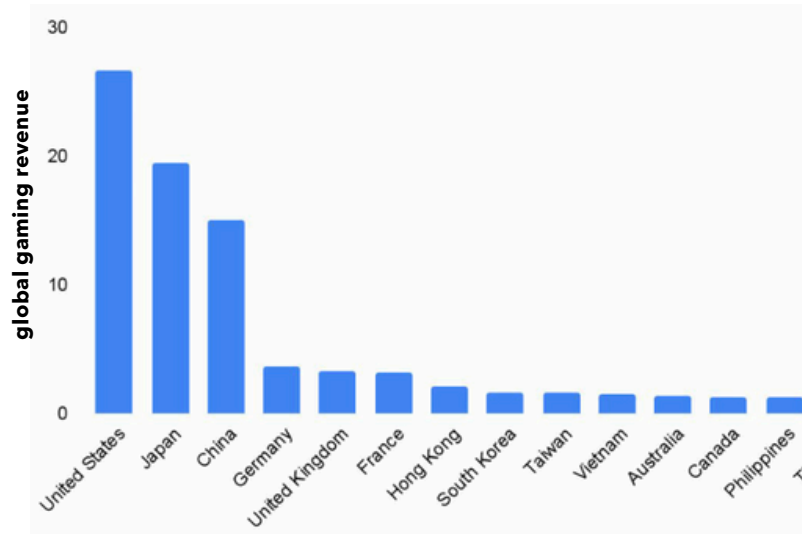
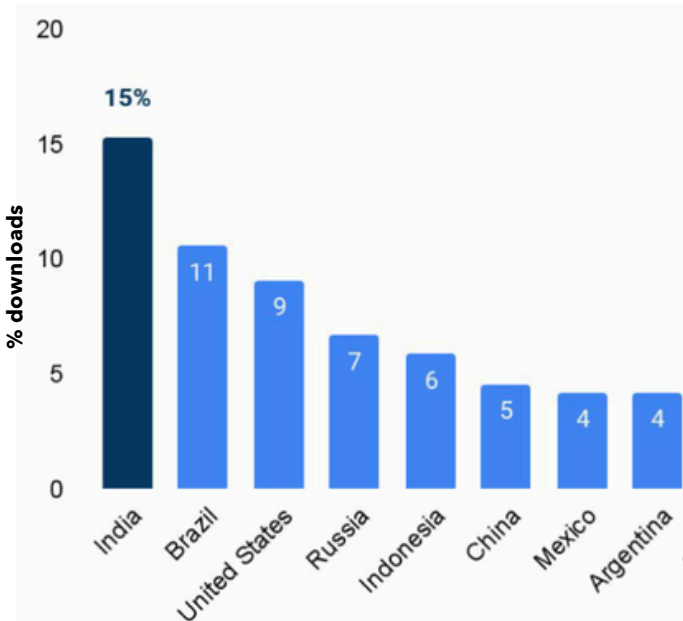
"The global AVGC market is estimated to be more than \$366 billion with animation and visual effects constituting 46% share and gaming 54% share. The country boasts as the world's second-largest gaming community, comprising 42.5 crore gamers, and from 2020 to 2023, the online gaming segment in India experienced a rise of 28% which was a market size of 16428 crores in 2023 and in the next four years, it should double." **Shri Priyank Kharge, Minister of Information Technology and Biotechnology, Government of Karnataka, at the second edition of the Indian Gaming Convention (IGC).**

"The skills developed in gaming, such as resource management and strategic thinking, are applicable across all business domains." **Shri Satya Nadella, Chief Executive Officer, Microsoft.**

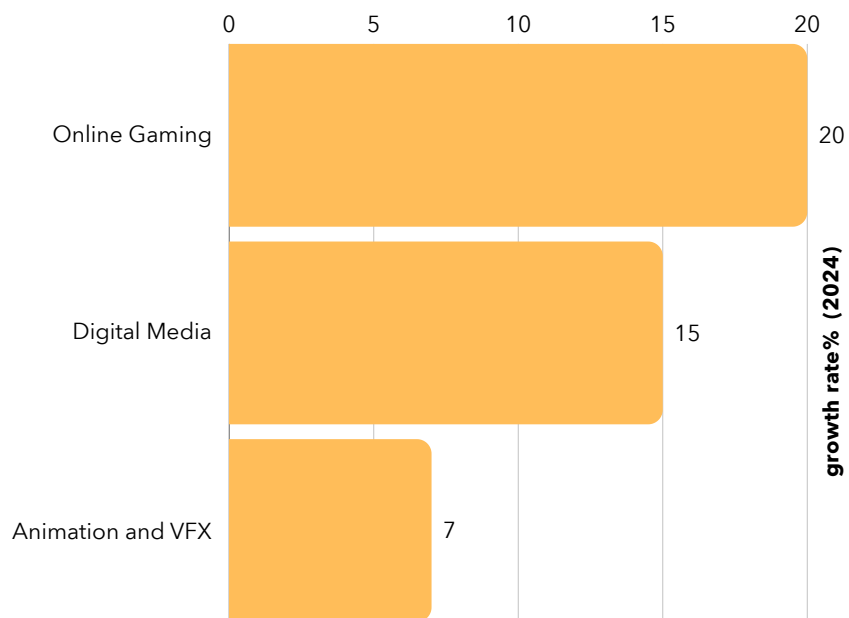
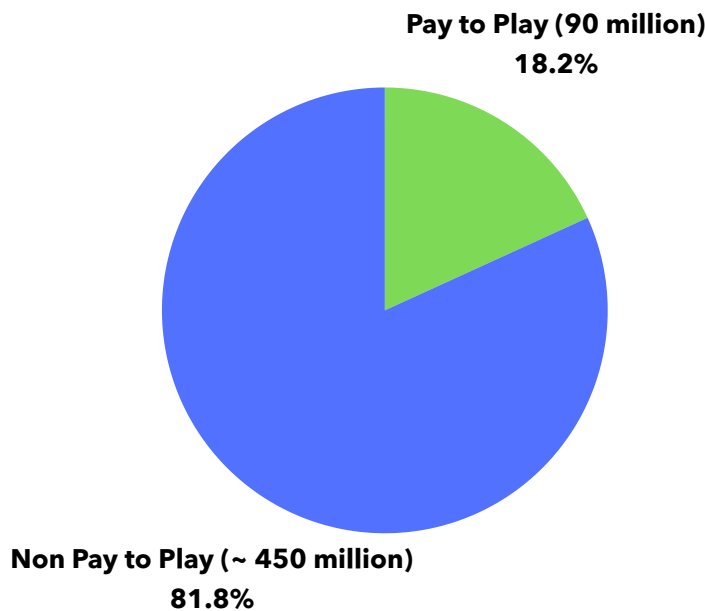
"The influx of capital is creating a significant economic impact on the gaming sector, driving growth and opening up new opportunities across multiple industries. India, with its skilled talent pool and large domestic market, is at a pivotal moment to solidify its position as a global gaming powerhouse." **Shri Manpreet Singh Ahuja, TMT Sector Leader and Chief Digital Officer, PwC India.**

# #LensChanger

Source: Blume Gaming Blueprint 2024



**India is #1 by app downloads, nowhere in revenues**  
**Is there a need for correction**



Source: Re-invent, FICCI EY 2024

**Online Gaming is the emerging preferred choice for consumers to engage with Media and Entertainment**

# #GameChanger Mic Drop

## **Curbs and Consequences: China's model of regulating Online Games misses the mark**

Rapid proliferation of online gaming is a worldwide phenomenon that has triggered sharp reactions from regulators globally. Regulatory and policy stances are constantly evolving with regulators often influenced by not just local, but also global developments.

In India, regulatory agencies overseeing digital domains, such as MEITY are reportedly preparing to roll out regulation, seemingly influenced by developments in other nations with commercially significant gaming markets, especially China.

Imposition of time limits on gamers, determined arbitrarily, is expected to be among the raft of proposed measures MEITY is said to be considering. Such features have been a common feature in regulatory regimes in China, South Korea, and other East Asian nations with vibrant e-gaming sectors. China, however, stands out in having the most consistent and restrictive approach towards regulation of play, dating back to 2000, initially aimed at targeting game addiction but now looking

at in-game spending, especially linked to gambling and gambling-like activities. Last year the Chinese government proposed strict regulations around spending limits, rewards for daily logins, deployment of loot boxes, and other in-game features. However, these announced measures were not enforced due to a fear of dampening the online gaming industry which is said to be valued in tens of billions of dollars.

More recently the focus of the Chinese regulators appears to be shifting. Regulators seem to be rethinking their initially policy approach of rolling out blunt broad-brush measures like arbitrarily set time limits, and bans on excluding young persons from accessing online games in favour of nuanced regulation. The emphasis of such an approach would be to specifically counter the negative impact of excessive gaming on users, in an evidence-based manner, while allowing the industry to continue growing sustainably. The change of tack on the part of the Chinese is visible in that there is an attempt to solicit feedback from the gaming industry



**Ankur Gupta,**  
**Senior Assistant Director,**  
**Digital Economy and Technology Laws,**  
**Singapore Academy of Law and Asian**  
**Business Law**

”

Blanket bans and arbitrary restrictions on online gaming may provide a false sense of security, but they fail to address the root causes of harm while stifling innovation and driving unethical market behavior.

# #GameChanger Mic Drop



on regulatory interventions, adopting a more consultative stance. This may have been spurred by the fact that several very prominent local game developers in China moved base overseas, preferring foreign markets for expansion. Clearly, this is not a desirable outcome for the Chinese authorities given the outsized significance of the sector on the broader local economy.

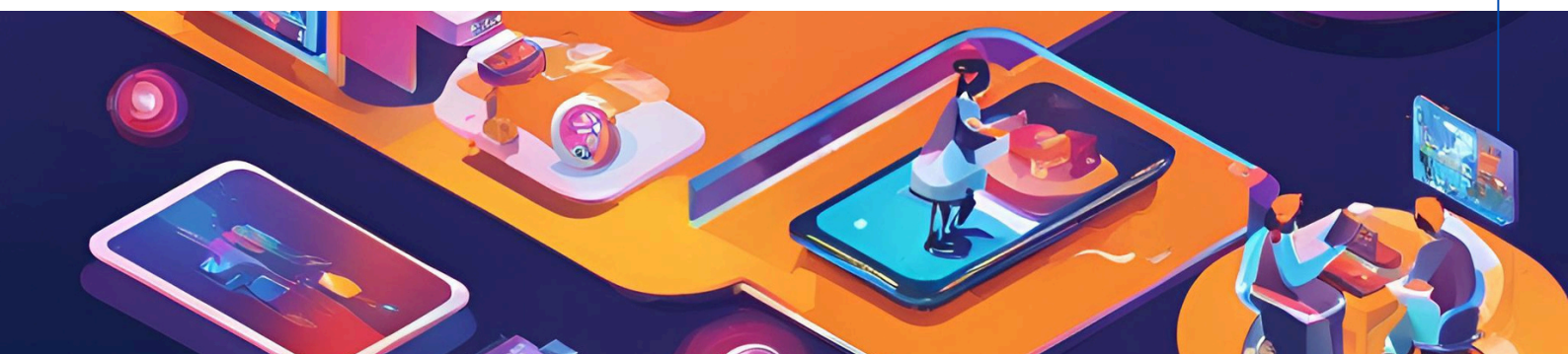
Social Scientists studying the behavioural impact of games on groups of users have attempted to evaluate the efficacy of China’s blunt gaming restrictions to curb problem gaming through arbitrary time limits. Dr Lim Tai Wei, a senior researcher at the East Asia

Institute, National University of Singapore concludes that research did not detect any significant changes in the post-restriction patterns in heavy play, which is defined as more than four hours daily and six days weekly.

A seminal scientific paper published in Nature found no credible evidence that Chinese-style state-controlled playtime limits have any impact on excessive gaming at all. A better approach may involve the imposition of in-game time limits into the design of the game, forcing gamers to take ‘eye breaks’ at regular intervals.

Besides playtime mandates, Loot boxes have also been the subject of regulatory attention in China and other countries. Loot Boxes, which can be described as virtual goodie bags gamers pay for in return for randomized gifts, are a popular monetization feature in online games. Regulators often liken them to a form of gambling. As such, wide-ranging bans on loot boxes, especially in games accessible to minors, are commonplace in some countries. However, as with legislatively imposed playtime limits, the efficiency of loot box bans is highly doubtful, as revealed in several research projects on the subject.

India hosts major gaming festivals like Indian Gaming Show, Comic Con India.



# #GameChanger Mic Drop

Belgium provides a useful case study in this regard as being the first country to legislatively ban loot boxes in online games. However, following the legislation it became apparent that the ban was essentially a paper tiger, primarily due to the inability of the Belgian authorities to enforce such a ban. Researchers studying the Belgian regulation and its impact warned that policymakers in this space ought to be cognizant of the harmful effects of imposing top-down bans which suffer from lack of enforcement.

Leon Xiao, a legal researcher based in Denmark, regarded for his pioneering work on contemporary Chinese and Belgium Game Regulation explained that top-down blanket bans give consumers, parents, and policymakers a false sense of security while allowing non-compliant games to substitute those that have been removed from the national market by more socially responsible companies.

In essence, bans on what regulators consider as harmful products promoting vice-like or self harming conduct, can often incentivize unethical market conduct as the demand for such products is not reduced by regulatory mandates. Bad actors, often beyond the reach of national law enforcement, often see bans as opportune, flooding the market with their unsavory products given the ease at which apps can proliferate online.

Concerns about online gaming are not unfounded and are shared across borders by regulators, civil society, and parents of young persons engaged in gaming. However, attempting to legislate through an 'all or nothing' approach is bound to fail. A more balanced approach that promotes responsible gaming habits, fosters creativity, and encourages international competitiveness is needed rather than blanket mandates which stifle socially responsible gaming and the sector at large. Considering age-appropriate ratings, parental controls, and promoting healthy gaming practices as part of digital literacy initiatives could be useful tools in the regulator's arsenal against the harmful effects of online games. Given the organic growth of the online gaming sector in India, play a leading role in shaping its future, but it needs to do so with a strategy that encourages innovation, protects users, and fosters a thriving gaming industry. As such, India's regulators have their task cut out in enabling India to be a leader in this space.

