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Institutional capacity and corporate ethics in the design and enforcement of online gambling regulation in Brazil and Great Britain

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Abstract

Under what conditions does responsible-gambling rhetoric become a verifiable and enforceable corporate obligation? This article examines that question through a nested comparison of Brazil and Great Britain, focusing on Brazil's eight-year trajectory marked by two watershed events: the unrestricted legalization of fixed-odds sports betting in 2018 and their prohibition on 25 September 2026. Both events were significantly unexpected, which favors the research design proposed here. Drawing on institutional economics and Baumol's account of entrepreneurship, it distinguishes the adoption of protective policies, their implementation, and their outcomes. Statutes, regulatory records, corporate statements, civil-society materials, and reputable news reporting are examined across six domains of corporate conduct. Great Britain provides comparatively explicit procedures for identifying risk, acting on it, and evaluating intervention, alongside restrictions on products and incentives, in a market accustomed to having this business regulated for a much longer period than Brazil. While Brazil developed some substantial protective duties after 2023, the implementation remained uneven and was often not perceived as thorough enough before sudden prohibition displaced licensing as the principal instrument of control. Due to some of its key characteristics, the September 2026 measure creates a natural-experiment opportunity for studying corporate responses to far-reaching policy reversal, although residual possibility of some anticipation, endogenous policy choice, and the absence of a counterfactual preclude causal estimates here. On the other hand, the evidence of correlation is quite robust, opening an avenue for future research into causation in this area that directly affects social welfare and is closely intertwined with financial governance in a globalized world. Collected evidence through 26 October 2026 shows operational withdrawal alongside litigation, organized opposition with harsh tactics, and attempts to preserve commercial visibility. These responses make the political conduct of firms and their intermediaries relevant to corporate ethics without equating lawful opposition with misconduct. The article develops a corporate integrity matrix and conceptualizes the commodification of economic hope as a mechanism connecting financial insecurity with betting engagement. Its central finding concerns accountability: both permission and prohibition require institutions capable of observing conduct, assigning responsibility, enforcing the rules of the game, and verifying the discharge of obligations.

1 Introduction

Commercial gambling places a familiar institutional problem in a particularly exposed setting. The firm earns revenue from a service whose intensive use can injure the customer, while the firm itself possesses much of the information needed to recognize that injury. Moreover, the business itself involves some sort of deception that people, for various reasons, are willingly discounting in exchange for immediate pleasure, alongside the thrill that comes with the expectation of further pleasure, which is based more on hopes than on odds.

A declaration of responsibility leaves this arrangement largely intact unless it changes the decisions through which customers are acquired, retained, and encouraged to spend. The relevant question is consequently one that links public authority, manifested through regulation and enforcement, with

private conduct. This question can be phrased to ask under what conditions does regulation turn a promise of protection into an organizational duty that can be checked and enforced?

Brazil's recent trajectory makes this question unusually concrete. After several decades of a national legal framework with no sympathy for gambling beyond the lottery, Law 13,756 of 2018 authorized fixed-odds sports betting. In most respects, the 2018 legalization was surprising and, as such, resembled a natural experiment. Moreover, even though the 2018 law pointed towards the necessity of quickly establishing a regulatory framework for the newly legalized business enterprise, a comprehensive federal operating regime did not follow during Jair Bolsonaro's presidency, from 2019 to 2022. It was only under Luiz Inácio Lula da Silva's third administration starting in 2023 that the federal government started to tackle the issue that was already spiraling out of control in some respects. Law 14,790 of 2023 and subsequent rules established licensing and supervisory arrangements while extending the statutory regime to online games. The way in which different betting firms reacted and adapted to the emerging regulatory regime was also in itself indicative of varying corporate ethics and the relation with institutional change and changing institutional capacity.

Under this broader scope, the federally regulated market began operating in January 2025. At the same time, criticisms were accruing in different levels of society due to what has been perceived by many as negative social effects of gambling especially on socially and economically vulnerable parts of the population.

Unexpectedly by most accounts, especially from market players scrutinized during this research project, on 25 September 2026, President Lula issued Provisional Measure 1,394, prohibiting fixed-odds betting, including sports betting and online games, and prescribing the termination of authorizations, an immediate end of related marketing campaigns, and the return of customer funds. Other legally authorized lottery modalities remained outside its scope [1, 2, 3, 4, 5].

The reversal presents a demanding setting for studying corporate ethics. During expansion, consumer protection can support a firm's reputation and help distinguish an authorized operator from an unauthorized competitor. When continued operation is prohibited, the same firm faces duties whose fulfillment may preserve customers' interests while offering little immediate commercial return. It must reconcile balances, retain records, communicate the closure, and supervise the conduct of intermediaries. At the same time, it can contest the policy through courts, associations, advertising spaces, and political contacts. These operational and political responses belong to the same institutional relationship, although they require different standards of assessment.

The economic stakes had become substantial before the reversal. An audit published by Brazil's federal audit court, the Tribunal de Contas da União (TCU), reported R$17.4 billion in gross gaming revenue and 17.7 million participants in authorized betting during the first half of 2025. By the announcement of prohibition, the government reported 85 authorizations, each carrying a R$30 million fee. These figures concern different objects: participants, gross gaming revenue, and authorization payments. None is a direct measure of addiction or the full social cost of gambling [6, 7].

Great Britain provides a useful comparison because it has developed a more established system of continuing supervision under the Gambling Act 2005. Its rules increasingly specify how operators must identify vulnerability, respond to indications of harm, evaluate interventions, and constrain particular products and incentives. This is a comparison with England, Scotland, and Wales, rather than with the United Kingdom as an undifferentiated jurisdiction. The purpose is to examine how organizational responsibility is specified and made reviewable, rather than to assume that an older system necessarily produces better social outcomes [8, 9, 10, 11, 12].

The argument proceeds in three directions. First, it treats corporate ethics as a relationship between commercial incentives, organizational decisions, and public verification. Second, it introduces policy reversal as an occasion for observing whether protective commitments survive a sharp reduction in the prospect of continued business. Third, it brings the conduct of associations, sports organizations, and media partners into the analysis. The commodification of economic hope helps connect the customer’s search for financial improvement to an industry’s capacity to acquire social allies. These are related mechanisms, but evidence of one cannot substitute for evidence of the other.

The inquiry closes on 26 October 2026, immediately after the announcement of Lula’s reelection. The Tribunal Superior Eleitoral reported his victory with 51.79% of valid votes. Executive continuity plausibly reduces the prospect of an immediate reversal initiated by a new president. It does not convert a provisional measure into permanent law. Congress had yet to complete its consideration, and judicial challenges remained material. The political implications of the election therefore enter the analysis as an inference about expectations, not as proof that prohibition will endure through the next presidential term [13, 14, 15].

2 Institutions and the organization of responsibility

2.1 Private information and public duties

Institutional economics directs attention to the rules that structure exchange, the costs of enforcing those rules, and the organizations that develop within them. North’s distinction between institutions and organizations is useful here: while, on one hand, a license, an administrative rule, and a procedure for verifying customer protection constitute parts of an institutional arrangement, on the other hand, an operator, a regulator, or an industry association acts within and seeks to alter that arrangement. Their interaction changes the distribution of information and the returns to particular strategies [16].

Baumol’s account of entrepreneurship adds a further consideration. Entrepreneurial effort can be allocated to productive, unproductive, or destructive activities according to their relative rewards. His argument does not require an invariant supply of entrepreneurs, nor does it establish that every profitable activity is socially productive. Applied to gambling, it asks how the institutional setting rewards investment in safer operation relative to investment in exploiting informational advantages or avoiding constraints. The categories refer to the social consequences of activities. They do not provide a warrant

for classifying an entire firm from its membership in an association or its decision to challenge a law [17].

The problem of information is especially important in online gambling. An operator may observe the timing of deposits, changes in spending, session duration, repeated attempts to recover losses, and the response to marketing. Such observations can support both commercial retention and protective intervention. Technical competence is therefore not evidence of ethical performance by itself. The question is how that competence is allocated, which decisions can be overridden by commercial managers, and what evidence remains available to those charged with supervision.

The literature on organizational decoupling helps explain why the existence of a policy is insufficient. If it is true that formal structures can support legitimacy while remaining distant from ordinary organizational practice, it might also be the case that implemented procedures fail to produce their stated results. These possibilities require separating policy adoption from implementation and implementation from outcomes. A responsible-gambling page establishes that a policy has been announced. Logs showing the timely suspension of marketing establish something different. Evidence that the customer's exposure to harm diminished would establish a further and more demanding result [18, 19].

Accordingly, corporate integrity is understood here as the demonstrable consistency of protective commitments with operational and political conduct. This definition leaves room for disagreement over policy. A firm can reasonably argue that a prohibition will displace demand into an unauthorized market while complying fully with the obligations in force. Its claim becomes empirically assessable through the evidence it supplies, the transparency of its sponsorship, and its treatment of customers during the dispute. Ethical assessment requires more than agreement with the government's preferred instrument.

2.2 The commodification of economic hope

Gambling-related harms extend beyond a clinical diagnosis. Financial loss can affect food, housing, family relationships, work, and health even when the person gambling does not meet a diagnostic threshold. The public-health literature therefore treats harm as a set of consequences distributed across individuals, affected others, and communities. It also directs attention to commercial conditions that organize exposure, rather than locating the entire problem in an allegedly defective consumer [20, 21, 22]. Although there are different variables at play explaining the underpinnings of these harms, some studies suggest insufficient financial education among the roots of the problem [23].

The commodification of economic hope denotes a specific mechanism within these conditions. A financial aspiration becomes a source of demand when a product is presented, explicitly or implicitly, as a plausible route to improving one's material position. An easily accessible platform converts that aspiration into repeated transactions. Personalization and persuasive design may sustain participation, while losses can renew the desire for a decisive win. The mechanism connects economic insecurity to

engagement without assuming that all gambling has the same motivation or that every low-income customer responds in the same way.

There is relevant evidence outside the present cases. Haisley, Mostafa, and Loewenstein found in experiments with low-income participants that induced perceptions of relative economic disadvantage increased lottery purchases. The findings establish a possible behavioral channel, even if they do not demonstrate the size of that channel among Brazilian online bettors. Likewise, Newall's analysis of deceptive platform design identifies potentially harmful frictions and inducements, including barriers to withdrawal and interface choices that favor greater spending. It supplies concepts for examining a platform, rather than evidence that every operator uses each feature [24, 25].

Brazil's pre-prohibition law addressed this mechanism directly. Article 17 of Law 14,790 prohibited advertising that suggested betting could substitute for employment, solve financial problems, provide supplementary income, or constitute financial investment. The legal issue was broader than the falsity of a numerical promise. It concerned the social position assigned to gambling in the customer's expectations. In July 2026, additional advertising rules required prominent warnings, including warnings about dependency, financial loss, and the distinction between betting and investment [2, 26].

This concept is an analytical proposition, not an estimated mediation effect. Just as aggregate deposits do not establish a consumer's reasons for betting, an income category does not disclose a psychological state, nor does the existence of a prohibition establish its enforcement. Within the present evidence, the concept explains why advertising, product design, and financial vulnerability should be examined together. Establishing its incidence and relative importance would require customer-level evidence beyond the documentary record.

2.3 Expectations and the distribution of adjustment costs

The regulatory relationship also concerns the future. Firms invest in licenses, technology, contracts, and customer acquisition in expectation of continuing operation. Sports organizations and media businesses can become dependent on the resulting revenue. As those commitments accumulate, the prospect of regulatory restraint acquires organized opponents beyond the operators themselves. Commercial expansion can consequently alter the political conditions under which its own regulation is decided.

A policy reversal exposes this distribution of commitments. While customers hold claims to balances and prizes, firms hold contracts and expectations, which go hand in hand with clubs facing budgetary adjustments. Meanwhile, the state faces enforcement and fiscal costs. These claims differ in legal status and social consequence. They should not be collapsed into a single measure of economic loss. Returning a customer's own money is an obligation whose fulfillment can be checked. Whether the state owes compensation for terminating an authorization is a distinct question, subject to legal contestation.

Three expectations follow. Where records make omission detectable and sanctions attach to a responsible organization, protective commitments should be more readily verified. Where market access is withdrawn, integrity should become visible in the discharge of residual duties, including duties with

little prospect of generating new sales. Finally, where commercial income connects operators to intermediaries with extensive public reach, resistance should extend beyond direct lobbying by betting firms. Even if the comparison does not estimate their independent causal effects, it assesses the documentary support for these expectations.

3 Comparative design and evidence

3.1 Cases and documentary procedure

The study uses a nested qualitative comparison. At the outer level, Brazil and Great Britain are examined through the same six domains. Namely: governance and accountability, advertising and incentives, identification of vulnerability, risk intervention, product and algorithmic governance, and, finally, monitoring and enforcement. Within Brazil, the analysis follows the transition from incomplete implementation after 2018 to federal licensing and then prohibition. It examines operators and associations, public authorities, sports and media intermediaries, and the civil-society coalition *Brasil Contra Bets*. Unauthorized supply is followed through enforcement records and attributed reporting, rather than treated as a measurable residual of the authorized market.

The cases were selected for institutional contrast and substantive relevance. Both involve digitally mediated gambling, commercially valuable behavioral data, and organized debate over responsibility. They differ in supervisory history and, after September 2026, in the principal instrument governing the supply of fixed-odds betting. Great Britain serves as a comparator for the specification of duties and the production of enforcement evidence. It is not an untreated statistical control for Brazilian household outcomes. Differences in products, income, institutions, and measurement make that interpretation untenable without additional design work.

The documentary inquiry used three groups of material. Statutes, regulatory provisions, administrative records, court documents, and official statistics establish legal duties and reported state action. Corporate releases, association publications, and civil-society statements establish attributed positions and announced conduct. Reporting by Reuters, Agência Brasil, Folha de S.Paulo, UOL, CNN Brasil, Exame, and Globo media conglomerate provides dated observations of commercial and political responses. Rather than being accepted as independent findings, evaluative claims taken from corporate and other organizational publications are used as evidence of what the issuing organization states.

Retrieval was purposive. Searches combined the names of the measure, organizations, and brands with terms concerning prohibition, withdrawals, sponsorship, advertising, enforcement, litigation, and elections. Portuguese searches emphasized “medida provisória”, “devolução”, “patrocínio”, “publicidade”, and “bets”. Meanwhile, British searches emphasized customer interaction, financial vulnerability, incentives, and regulatory action. Although the event inquiry concentrated on September and October 2026, wide-ranging earlier material was used alongside to reconstruct the legal and commercial setting, in terms of evolution and different institutional moments. The reference list identifies the sources to

record the principal event observations. This is a documentary case analysis, rather than a systematic review claiming exhaustive retrieval.

The unit of observation is a dated duty, organizational statement, administrative finding, or reported action. Each is assigned to a domain and distinguished by evidentiary status: it might be a legal requirement, or a self-reported commitment, or an externally reported observation, or an administrative or judicial decision, or even an analytical inference. Ate the same time, event dates are separated from publication dates. Reproductions of the same agency story are not treated as independent corroboration, as well as reporting about a group, association, or brand is not automatically attributed to every member or legal entity connected with it.

The analysis compares policy adoption, implementation, and outcomes within each domain. Missing public evidence is recorded as unavailable, rather than as evidence of either compliance or misconduct. There were no interviews, customer-account audits, or original transaction records. Accordingly, the study can examine the specification of duties, documented failures, observed withdrawal, and public contestation. It cannot rank operators by unobserved internal performance or establish a population effect on gambling-related harm.

3.2 The natural-experiment opportunity and its limits

Brazil's September 2026 prohibition has an important feature associated with natural-experiment research: a change imposed outside the researcher's control sharply altered the conditions facing a pre-existing set of organizations. The deposit prohibition, withdrawal deadline, removal of platforms, and subsequent restitution procedures created dated opportunities to observe behavior. For an individual operator, the national decision was not a choice of treatment. Its response can be compared with that of other operators facing the same general legal event [4, 7].

This does not establish a natural experiment in the stricter sense of a design with plausibly exogenous or as-if random assignment. Policy was responsive to perceived harm and electoral incentives. Firms differed in exposure, resources, legal strategies, and the degree to which they anticipated the decision. Reuters reported preparations for restrictions on 17 September, and Folha reported sponsorship-termination notices on 24 September. The breadth and timing of the final measure may have surprised particular actors, but the evidence rules out an assertion that the entire industry was unaware of the possibility [27, 28, 29].

The 2018 authorization offers an earlier policy discontinuity. It changed the statutory treatment of fixed-odds sports betting after decades in which many forms of commercial gambling were prohibited. Brazil was not a country without legal gambling, as it maintained legally authorized lotteries, but criminalization of various gambling activities has been a central part of the country's legal framework and public discourse. The subsequent interval of incomplete implementation and the expansion of the statutory scope in 2023 mean that the sequence is not a clean reversal between two otherwise identical states.

Digital access, advertising exposure, payment systems, and the organizations themselves changed over those years [1, 2, 3].

The appropriate use of these events is therefore bounded. They open opportunities for natural-experiment research and support a qualitative inquiry into corporate conduct under a common policy shock. This article uses the September event as a test of the observable consistency of commitments. It does not derive a causal estimate from a before-and-after contrast, use the election as an instrument, or assume that Great Britain supplies the missing counterfactual. For this purpose, the value of the shock lies in the obligations and strategic choices it makes visible.

4 Brazil before prohibition

4.1 Authorization and delayed institutional construction

Law 13,756, enacted under Michel Temer in December 2018, created fixed-odds betting as a lottery modality concerning real sporting events. Its implementation was to be regulated within two years, extendable for an equal period. The comprehensive regime was not completed by the end of Bolsonaro's presidency. Describing that interval as entirely without law would be imprecise: the authorizing statute, general consumer law, and other legal constraints existed. The material absence was a fully implemented federal framework for authorization, supervision, and the enforcement of sector-specific obligations [1, 3].

Lula's third administration changed both scope and institutional density. The 2023 legislation covered real sporting events and online games, established requirements for authorization and corporate policies, regulated advertising and customer rights, and provided an administrative sanctions framework. The online-game category should not be confused with the opening of physical casinos. Nor did it automatically render every game distributed through an offshore platform authorized. Rules governing systems, game certification, payments, reporting, responsible gambling, and advertising subsequently gave operational content to the legislation [2, 30].

This distinction matters for the argument about policy reversal. The same administration that prohibited fixed-odds betting in 2026 had helped construct the licensed market and extend its scope. Operators could point to fees, organizational investments, and public encouragement of regulated provision as grounds for expecting continuity. Those expectations were consequential, but not universal certainty. Evidence of preparations for restrictions before 25 September shows that the issue had already entered commercial planning [28, 29].

4.2 Protective obligations and uneven implementation

The pre-prohibition framework contained substantial protective duties. The SPA's responsible-gambling rules provided for self-limitation tools, alerts, monitoring of risky behavior, and self-exclusion. Centralized self-exclusion was available from December 2025, supplementing operator-level arrangements. In

August 2026, the Ministry of Finance reported more than 1.2 million requests. This establishes use of the administrative mechanism, rather than the number of clinical cases, the extent of adherence across every operator, or a measured reduction in harm [31, 32].

Advertising restrictions also reached beyond a generic warning. The statutory prohibition on presenting gambling as income or investment addressed the economic expectation around which engagement could be organized. The July 2026 measures extended requirements to actors involved in promotion and required prominent warnings. Brazil was thus not merely relying on voluntary disclosure while Great Britain regulated conduct. The comparison concerns the specificity, verification, and implementation of duties, including the possibility that a younger system can impose a more categorical restriction in a particular domain [2, 26].

The enforcement record nevertheless disclosed weaknesses within the authorized market. In decisions dated 13 and 14 August 2026, the SPA adopted precautionary measures involving Pixbet, Zeroumbet, Enseada, Select Operations, Nexus International, and RR Participações. The official register identifies reporting and monitoring concerns and, for Pixbet, deficiencies in effective mechanisms to control, assess, and follow customers under responsible-gambling policies. Notably, these are administrative measures with stated grounds, and they should not be described indiscriminately as final findings or permanent expulsions. The register's corrections also clarify that the relevant proceeding dates were in 2026, despite erroneous references to 2025 in some entries [33].

The TCU's audit provides an independent institutional perspective. It identified deficiencies in coordination, information sharing, and the operational detection of unauthorized domains, including reliance on reactive reporting and manual searches. Such findings support a claim about implementation capacity more directly than the age of the regulator does. They also prevent a simple narrative in which the rapid production of norms necessarily demonstrates effective control of the market [6].

The balance is consequently mixed. Brazil had established licensing, monitoring, self-exclusion, and advertising constraints, and had begun using precautionary enforcement against authorized operators. At the same time, visibility over unauthorized supply and the coordination of public action remained incomplete. Neither a license nor the absence of a published suspension establishes superior corporate ethics. Enforcement visibility is itself a product of surveillance and disclosure, and firms with similar conduct may differ in their likelihood of being investigated.

5 Great Britain and the verification of protective conduct

5.1 From licensing objectives to operational evidence

The Gambling Act 2005 organizes licensing around the prevention of crime, fair and open gambling, and protection of children and vulnerable persons. Licence Conditions and Codes of Practice (LCCP) connect these objectives to continuing obligations. Social Responsibility Code 3.4.3 requires effective systems

for identifying risk, acting on it, and evaluating the response. The applicable guidance is the version under Code 3.4.3, while the earlier guidance under Code 3.4.1 ceased to apply to remote operators in 2022 [8, 10, 34].

The importance of this arrangement lies in the evidence required. Observation must extend across relevant indicators, intervention must respond to the level of risk, and evaluation must consider whether further action is necessary. The obligation is not discharged merely because a warning was sent. A supervisor can ask what the operator knew, when the information was available, what action followed, and how its adequacy was assessed. The provisions also address the responsibilities retained when functions are contracted to third parties [10, 34].

Financial vulnerability checks add a more specified trigger. From 28 February 2025, the relevant threshold was deposits minus withdrawals exceeding £150 within a rolling 30-day period. The check draws on public-record indicators such as bankruptcy or debt judgments and requires consideration alongside other permitted information, proportionate action, and a recorded rationale. The code provides for manual review in the circumstances it specifies. This is a screening obligation, not a universal affordability certificate or a £150 loss allowance [11].

Product and incentive restrictions complement individual interaction. Online-slot stake limits introduced in 2025 set maximum stakes of £5 for adults aged 25 and over and £2 for those aged 18–24. From 19 January 2026, the Commission's incentive rules limited wagering requirements to ten times the incentive amount and prohibited incentives conditional on participation across different gambling products. The policy instruments differ from Brazil's statutory restriction on advances and prior benefits for placing bets. A proposal to import British bonus rules therefore cannot proceed as if Brazil lacked restrictions of its own [35, 12, 2].

5.2 Enforcement and the limits of institutional maturity

The enforcement record also supplies evidence against idealizing the comparator. In December 2025, four remote operators trading as Paddy Power and Betfair agreed to a £2 million regulatory settlement following social-responsibility failures. The Commission identified delayed recognition or intervention, including a customer depositing £25,000 in 25 days before interaction. Rather than a finding about every affiliate of the wider corporate group, these are specific findings about the operations investigated [36].

On 21 October 2026, the Commission recorded a £900,000 settlement concerning L & L Europe Limited. The review covered failures between October 2024 and October 2025 in anti-money-laundering and social-responsibility controls, as well as requirements concerning withdrawals, terms, and technical standards. The decision date places the observation within the article's cutoff, while the conduct period makes clear that it does not describe only that week's activity [37].

These cases demonstrate the production of reviewable findings and consequences. They also demonstrate that specified duties can coexist with substantial operational failures. More published sanctions may indicate more effective scrutiny, more noncompliance, or both. Comparing the number or

monetary size of sanctions across the two countries would therefore require attention to investigative exposure, the population of licensees, procedure, and disclosure. The present comparison concerns the content of accountability, rather than a league table of ethical markets.

Table 1 summarizes the functional comparison before the Brazilian reversal. It identifies particular differences without treating institutional maturity as a single score. The comparison also makes visible a shared limitation: technical certification and account monitoring do not, by themselves, establish that every personalization model or commercial incentive has been independently assessed for its effects on harm.

Table 1
Protective duties before the Brazilian prohibition and the British comparator

Domain	Brazil before 25 September 2026	Great Britain through 26 October 2026
Governance and accountability	Authorization, corporate policies, regulatory reporting, and precautionary intervention [2, 33].	Continuing license conditions, reviewable customer-interaction systems, and published regulatory action [10, 36].
Advertising and incentives	Restrictions on income claims; warning requirements; statutory prohibition of advances and prior betting benefits [2, 26].	Advertising obligations plus a tenfold wagering cap and a ban on mixed-product incentives from January 2026 [12].
Identification of vulnerability	Behavioral monitoring, access restrictions, and centralized self-exclusion alongside individual tools [31, 32].	Specified indicators and public-record vulnerability checks above the applicable net-deposit threshold [10, 11].
Risk intervention	Duties to provide controls and act on problematic behavior; implementation under scrutiny [31, 33].	An explicit identify, act, and evaluate sequence, with further intervention where needed [10, 34].
Product and algorithmic governance	Systems and game-certification requirements; no inference of independently demonstrated safety for every model [30].	Slot stake limits, incentive restrictions, and technical standards; these do not amount to a universal algorithm audit [35, 12, 37].
Monitoring and enforcement	SPA reporting and sanctions architecture; TCU findings of operational and coordination gaps [30, 6].	Continuing supervision and published settlements that specify operational failures [36, 37].

6 Prohibition and the conduct of firms and intermediaries

6.1 The legal event and its timetable

Provisional Measure 1,394 changed the principal object of supervision from authorized supply to withdrawal, restitution, and prevention of prohibited supply. Article 1 covered fixed-odds sports betting and online games offered to persons in Brazil, including by foreign operators. Article 2 extended its

application to Brazil's 26 states plus its Federal District — i.e., where Brasília, the country's capital, is located, and which counts, in most respects, as another subnational state — authorizations. The measure did not prohibit every lottery. Nor did its publication mean that every digital channel immediately disappeared: the transition separated the entry of new funds, access for withdrawals, the removal of platforms, and the formal termination of authorizations [4].

Table 2 reconstructs the government's announced timetable. The distinction between a deadline and an observed outcome is essential. A legal duty to return a balance establishes a claim against the responsible organization; it does not establish that the transfer reached its owner. Portaria 3,005 of 2 October additionally specified reporting through the Sistema de Gestão de Apostas (Sigap), with final balances as of 5 October to be reported to the SPA by 7 October. That reporting date should not be confused with the broader 7–8 October schedule for information to financial institutions [7, 38].

Table 2
Announced timetable and the evidence needed to verify performance

Date in 2026	Required or announced step	Verification needed
25 September	Publication of the MP; prohibition of new deposits.	Deposit and payment records.
By 5 October at 23:59	Voluntary withdrawals; removal of advertising and sponsorship material within the transition.	Withdrawal logs and dated advertising records.
From 6 October	Sites and applications offering betting become unavailable.	Access tests by location and domain.
7–8 October	Operators provide financial institutions with remaining balances by individual taxpayer identifier, or CPF.	Reconciled files and receipt records.
9–14 October	Financial institutions return balances to customers.	Completed transfers and failed-payment reasons.
From 14 October	Caixa Econômica Federal Bank (Caixa) handles resources that banks could not return.	Transfer to Caixa and final beneficiary reconciliation.
25 October	Termination date of existing authorizations under the thirty-day rule.	Authorization records and applicable court orders.

The measure also preserved responsibility beyond exit. Articles 5 and 10–11 maintained supervision, residual obligations, transmission of data, and record retention, including a minimum five-year period for relevant records. A significant qualification appears in Article 13: administrative sanctioning proceedings not finally decided were suspended and would be archived if operators timely fulfilled all the obligations in the transition chapter. This changes the incentives surrounding exit and the future observability of the enforcement record. It cannot be assumed that a pending proceeding would culminate in a final published sanction [4].

This provision merits attention alongside the more visible prohibition. A government can strengthen duties concerning the return of money while reducing the prospect of completing some earlier administrative proceedings. Whether the conditional closure facilitates orderly withdrawal or weakens accountability depends on its implementation. The text establishes that tradeoff; the available record does not establish how often the condition was satisfied or which proceedings were ultimately archived. Corporate compliance and the state's preservation of an intelligible institutional record are therefore separate matters for evaluation.

6.2 Operational withdrawal and residual obligations

The first response cannot fairly be described as uniform defiance. On 28 September, Flutter stated that it had ceased sports-betting and online-gaming operations in Brazil in compliance with the measure while considering its options, including appeal. It forecast approximately US$70 million less revenue and US$20 million less adjusted earnings before interest, taxes, depreciation, and amortization for 2026 if it could not operate for the remainder of the year. Those are conditional corporate forecasts, not realized losses or welfare estimates. Reuters separately reported the financial implications for Flutter and Entain [39, 40].

UOL reported on 6 October that prominent platforms had become unavailable. It identified redirections from Sportingbet, Betnacional, Esportes da Sorte, and Superbet to a government page and closure notices from Betano and KTO. These observations support a narrower finding of visible interruption on the channels reported. They do not independently verify that all deposits had stopped, that every relevant application was inaccessible, or that funds had been returned without delay [41].

Restitution presents a different evidentiary problem. Reporting in early October identified approximately R$1.325 billion remaining for return to around 26.5 million persons. The amount was an outstanding balance in the transition, not the value of all previous losses or a measure of the money restored by that date. A person could have accounts with several operators. The evidence documents the administrative scale of the obligation, but does not provide a harmonized, operator-by-operator reconciliation of completed payments through the cutoff [42].

The absence of such a reconciliation limits an ethical ranking. A rapid closure notice is evidence of communication; a transfer file is evidence of an instruction; a completed transfer is evidence of restitution. These events cannot be substituted for one another. An integrity assessment should preserve that sequence, including unresolved claims, customer support after closure, and the treatment of small balances. Otherwise, an operator could receive reputational credit for an announcement while the practical costs of exit remain with the customer.

6.3 Litigation and access beyond the licensed channel

Litigation introduces another distinction, because a firm's request for judicial protection is an exercise of a legal avenue. An injunction may temporarily alter its obligations, and its scope and duration must be respected in any assessment. Seeking review does not establish unethical conduct, just as possessing

an injunction does not establish that all associated commercial activity is lawful. What matters is the relationship between the applicable decision, the specific legal entity, and the conduct observed.

The Stake episode illustrates these requirements. A federal injunction had allowed temporary operation until 25 October. On 9 October, the regional federal court suspended that protection following a request by the Advocacia-Geral da União (AGU). The decision addressed the risk of unequal treatment and fragmentation of the national policy. It suspended the injunction rather than finally deciding the constitutional merits of prohibition [15, 43].

Meanwhile, on 13 October, in reporting subsequently updated on 16 October, it has been documented access to a Portuguese-language international Stake site, a registration using Brazilian details, and promotional emails after prohibition. It also reported that a local-currency deposit could not be completed. The account separated the international channel from the Brazilian domain displaying a suspension notice. In its response, Stake said the executives approached represented the suspended Brazilian operation and declined to comment on international access. These are attributed findings and a company response, not an independently replicated account audit or a final adjudication of responsibility [44].

The episode is analytically important because the national brand, licensed subsidiary, international platform, and customer communication system need not coincide. This is precisely where a multinational organization's allocation of responsibility becomes relevant. A claim to local compliance may be accurate for a specified entity and still leave a separate question about the group's provision of access from elsewhere. Conversely, a report about an international domain does not establish that the Brazilian subsidiary operated it. An institutional account must retain both questions rather than erase the corporate boundary or allow it to settle the matter without inquiry.

6.4 Stadium campaigns and the preservation of visibility

Political communication continued after the advertising deadline. The IBJR and Associação Nacional de Jogos e Loterias (ANJL) announced that associated operators would yield pitch-side advertising space in nine matches of the 29th league round, played on 7 and 8 October, to a campaign under the slogan "Proibir não é proteger". Their publication described arguments about regulatory stability, protection in an authorized market, and displacement into unauthorized supply. Newspaper Folha also reported the planned display. CNN Brasil documented Flamengo wearing the slogan in the space previously occupied by its principal betting sponsor on 8 October [45, 46, 47].

The timing matters. These messages circulated after the announced removal deadline for betting advertising and sponsorship. Their form also matters: an argument against prohibition is not identical to a direct invitation to place a bet. The evidence supports the observation that commercial advertising spaces were used for organized opposition to the measure. And that took place during the presidential campaign in which there are strict rules of political advertising. However, without an applicable administrative or judicial finding, it does not settle whether each display breached Article 16.

Nevertheless, one cannot avoid seeing it as confrontational to the new legal framework. The campaign made an explicit political argument about the policy even where the betting brands themselves were absent.

A further response preserved brand association through other services. UOL reported on 23 October that São Paulo and Fluminense displayed Superscore and Palmeiras displayed Sportingblog, sports-results or statistics brands linked to betting groups. This is distinct from the anti-prohibition slogan. It concerns the continuity of commercial visibility through related activities, with legal questions about indirect promotion and group relationships. The report did not identify an official determination resolving the permissibility of those particular displays [48].

For ethical assessment, the relevant questions are the sponsor's identity, the purpose and funding of the communication, the connections between the promoted service and prohibited gambling, and any direction of audiences toward a betting channel. None can be answered merely from the disappearance of the word "bet". At the same time, neither shared ownership nor similar branding establishes a violation by itself. The institutional challenge is to specify the evidence that distinguishes lawful discussion or diversification from promotion designed to defeat a restriction.

6.5 Football organizations and electoral influence

In Brazil, football is part of people's daily lives and exert cultural influence beyond the game itself. Moreover, sports organizations were not passive recipients of the shock. Before the measure, operators had already notified clubs of possible termination of sponsorship. Afterward, clubs sought to preserve their contractual and budgetary position. A petition dated 1 October by São Paulo, Ponte Preta, Vitória, Guarani, and Portuguesa sought admission as amici curiae in constitutional proceedings. It connected sponsorship income to existing expenditure commitments and argued that preserving brand display alone would be insufficient if the sponsor could no longer operate. The petition establishes the clubs' articulated interests, not the independent accuracy of every financial projection in their submission [29, 49].

This is a visible mechanism through which a market acquires political support. Clubs brought organizational standing, supporters' attention, and access to valuable communication spaces to a dispute initially directed at operators. Their dependence had distributional consequences: protecting sporting income and employment could be invoked against a policy justified by household losses and public-health costs. The competing claims concerned which institutions and social groups would absorb adjustment. Their existence does not establish that one side's costs were fictitious or that the other side's proposed remedy would necessarily succeed.

The dispute also entered the electoral arena. Newspaper Folha reported on 22 October, citing three unnamed sources, that Flávio Bolsonaro and Flamengo president Luiz Eduardo Baptista had discussed the issue by telephone the day after the measure. According to that account, the candidate offered to find a solution for clubs and betting firms if elected, but did not publicly commit to restoring

authorization. The same report recorded Flamengo's denial that it would endorse a candidate and stated that the candidate's campaign had not answered its requests for comment [50]. The whole situation has been perceived, nevertheless, as signaling an attempt of mixing public support for football clubs — especially those with very large fan bases — with electoral choices.

This evidence supports a claim of reported political access and an attempt to shape the prospective policy response. It does not establish an illegal electoral transaction, an institutional endorsement by the club, or an effect on votes. The anonymity of the sources limits independent verification of the conversation. The timing of the stadium campaign likewise makes electoral influence a plausible purpose or consequence, but neither establishes the direction or magnitude of its effect. An account of corporate ethics should examine such conduct without assigning evidentiary status to suspicions that the record cannot resolve.

6.6 Media ownership and the limits of an inference about impartiality

The media relationship includes a documented ownership interest. MGM Resorts and Grupo Globo announced a Brazilian venture in August 2024 to seek a sports-betting and online-gaming license under the BetMGM brand. Their release presented the combination of gaming technology with Globo's audience reach and knowledge of Brazilian consumers as a commercial advantage. The IBJR's membership publication identifies BetMGM Brasil as a venture of MGM Resorts and Grupo Globo. The relationship is therefore more direct than the sale of advertising alone. It is a Brazilian commercial joint-venture involving both organizations. [51, 52].

The reversal placed that commercial interest alongside Globo's role in reporting and hosting electoral coverage. In October, the broadcasters' association Abert sought suspension of the measure, citing effects on advertising contracts and other legal objections. Separately, Exame reported that Flávio Bolsonaro met Globo executives before his television interview on 16 October. It reproduced the broadcaster's explanation that institutional visits were routine and that news personnel did not attend. Lula's criticism linking Globo's position to betting was an allegation made in the campaign, rather than an established finding about newsroom conduct [53, 54].

These facts warrant treating the ownership interest as a potential conflict requiring disclosure and demonstrable editorial safeguards. A material interest in restored authorization can support a hypothesis about a corporate policy preference. It cannot establish that particular reporting was biased, that the executives promised electoral support, or that a candidate would in fact restore the market. Assessing those claims would require comparable coverage, evidence of editorial decisions, and reliable documentation of the alleged political arrangement.

The source record itself cautions against a totalizing inference. As a display of how complex the issue is — as well as how complex is the governance structure of this large media conglomerate —, investigation of international Stake access was published within Globo's own media group. While this does not prove

editorial independence across the group, it illustrates why ownership cannot substitute for analysis of actual coverage. The article therefore includes the relationship in the political economy of gambling while preserving the distinction between economic exposure, access to decision-makers, and demonstrated editorial favoritism [44].

6.7 Civil society and the durability of the measure

Organized opposition did not exhaust the field of contestation. The coalition *Brasil Contra Bets* advanced a public-health position through a legislative campaign. In a statement published by the Instituto de Estudos para Políticas de Saúde (IEPS) — an organization partially sponsored by former Central Bank president, Armínio Fraga, who is an influential player in Brazil's financial market —, it challenged clubs' presentation of betting sponsorship as indispensable while recognizing that a transition should address dependence on that income. Its demand for restrictions on advertising and sponsorship was directed at the organization of exposure, rather than limited to better instructions for an individual customer [55].

This position should not be collapsed into endorsement of every provision of the September measure. A coalition supporting restrictions on promotion, a government imposing supply prohibition, and a licensed operator proposing intensified supervision articulate different instruments. The comparison is better served by examining their proposed duties, transitional arrangements, and standards of evidence than by placing them in an undifferentiated division between supporters and opponents of betting.

Clearly, Lula's reelection changes the immediate political context but leaves the legal sequence unfinished. As of 26 October, the congressional record listed the measure as awaiting installation of its joint committee, with the first deliberation period ending on 23 November and urgency scheduled from 9 November. Presidential continuity makes the expectation of a swift executive restoration less plausible, all else equal. Whether prohibition becomes durable also depends on Congress, courts, administrative coordination, and the ability to restrict unauthorized access. In other words, no four-year guarantee follows from the election result [13, 14]. Therefore, the discussion about what would an ideal regulatory framework be for these gambling activities remain a valid and pressing issue. Likewise is the discussion, from this comparative perspective, on what institutional framework can induce the best corporate integrity in this field.

7 A corporate integrity matrix

The comparison makes it possible to specify what an assessment of integrity would require. The matrix in Table 3 separates a policy's adoption, evidence of its implementation, and the outcomes against which it should be judged. These are distinct evidentiary demands. The instrument is an analytical framework derived from the comparison and the literature on decoupling. It has not been validated as a scale and does not assign a composite numerical score to firms [18, 19].

The same six domains are used throughout. Political conduct enters governance, advertising, and accountability rather than becoming an unrelated ethical category. This permits a regulator or researcher

to ask whether the organization's claims remain consistent across its product, its customer relationships, its association membership, and its response to a restrictive policy. It also prevents a public campaign from compensating for a failure to protect a customer or return a balance.

Table 3
Corporate integrity across adoption, implementation, and outcomes

Domain	Policy adoption	Evidence of implementation	Outcome to verify
Governance and accountability	Named responsibility; conflict and political-activity rules.	Decisions, budgets, association mandates, and independent review.	Corrected failures; identifiable responsibility; disclosed conflicts.
Advertising and incentives	Rules for content, affiliates, and sponsored advocacy.	Campaign inventory, payer identity, approvals, and takedown records.	Exposure to prohibited content; repeated breaches; timely correction.
Identification of vulnerability	Risk indicators, access rules, and review procedures.	Detection logs, model changes, false-negative checks, and human review.	Timeliness and coverage of identification; unequal error rates.
Risk intervention	Escalation, marketing suppression, and self-exclusion duties.	Actions linked to signals; exclusion tests; recorded follow-up.	Recurrence of risky exposure; effectiveness of intervention.
Product and algorithmic governance	Prelaunch assessment; constraints on persuasive design.	Versioned tests, incentive review, withdrawal-path audits, and safeguards.	Avoidable frictions; risk changes attributable to design.
Monitoring and enforcement	Reporting, records, remediation, and exit obligations.	Reconciled files, completed refunds, retained records, and regulator access.	Unreturned balances; reporting gaps; unresolved complaints.

During prohibition, several indicators can be defined particularly clearly. The denominator for restitution is the total number and value of claims due, including unresolved bets and prizes as required by the applicable rules. Meanwhile, the numerator is completed, reconciled payment. Averages should be supplemented by the distribution of delays and the reasons for failures. Removing an application should be assessed across relevant stores and locations. Preservation of customer support and records must continue after the public-facing betting channel closes.

For ongoing operation, fewer interventions do not necessarily indicate safer gambling, and more interventions do not necessarily indicate better protection. Either can reflect differences in customer composition, detection sensitivity, or documentation. Evaluation should connect a risk signal to action and subsequent exposure, identify the comparison on which effectiveness is judged, and retain unsuccessful cases. Reported increases in self-exclusion require similar care: arguably, they may reflect

greater distress, improved access to a tool, stronger communication, or a combination of these developments.

The political component requires a different form of verification. Operators should identify the organizations through which they advocate, the campaigns they finance, the evidence behind factual claims, and the safeguards separating commercial interests from ostensibly independent communication. These requirements do not imply that an association must support prohibition or that a broadcaster must surrender editorial judgment. They make responsibility attributable where financial relationships and public influence are otherwise difficult to observe.

The matrix consequently supports bounded conclusions from public material. In the present cases, it identifies documented administrative deficiencies, reported platform withdrawal, corporate statements of compliance and contestation, and specific forms of sponsored communication. Particularly, it does not establish which Brazilian operator is the most ethical. Such a ranking would require comparable access to the underlying evidence and a defensible treatment of what remains unobserved, which is an avenue for further research in this field.

8 Discussion

The findings revise a simple opposition between an immature Brazilian regime and a mature British one. Before prohibition in Brazil, both countries were imposing duties that exceeded generic disclosure. Britain provided comparatively explicit procedures and a more developed record of operational findings. Brazil imposed meaningful advertising restrictions, built centralized self-exclusion, and used precautionary measures against authorized firms. The TCU's findings locate a substantive weakness in implementation and coordination. They do not reduce the Brazilian framework to the absence of regulation. Yet, in a world of globalized finance, there is evidence that the lion's share of the funds flowing into these online gambling organizations was customarily siphoned out of Brazil, which also taxed the sector substantially less than other activities that are more productive in Baumol's sense.

The September 2026 event then suddenly changes the question. If the comparison ended at licensing, it would miss obligations that survive the withdrawal of permission and political responses that seek its restoration. The evidence shows that withdrawal, litigation, sponsored opposition, and preservation of brand visibility can coexist. Their coexistence is more revealing than a judgment that firms either obeyed or resisted. It indicates that corporate ethics must be examined at the level of particular actions, responsible entities, and verifiable duties.

The event offers partial support for the expectation concerning intermediaries. As discussed, clubs articulated contractual dependence in a court petition, while associations used stadium spaces to carry their campaign. Meanwhile, broadcasters organized legal opposition, and the strongest media group held a documented interest in an operator. The evidence establishes channels through which commercial interests entered public contestation. It does not establish that the channels determined the policy, coordinated a single electoral strategy, or caused the election result.

Baumol's argument helps interpret this setting without turning it into a moral classification of firms. An institutional change alters the relative returns to organizational activities. After prohibition, effort can be directed toward orderly closure, legal review, development of another lawful service, or attempts to preserve access to prohibited supply. Their social consequences differ, and the same group may pursue several activities at once. The research task is to establish those activities and consequences, rather than infer them from a declared value or commercial success.

There is also a qualification to the claim that credible sanctions produce integrity. Article 13 of the MP introduces a conditional closure of unfinished administrative proceedings. In the short term, that provision may strengthen the incentive to complete transition obligations. Over a longer horizon, it may diminish opportunities to conclude and publish findings about earlier conduct. This is a possible institutional tension within the same instrument, not evidence that conditional archiving actually erased particular violations. A study of implementation must preserve that distinction.

Prohibition also leaves the capacity problem in place. Licensing relies on the state's ability to identify responsible organizations and obtain operational information. Prohibition requires cooperation across payments, telecommunications, digital platforms, and jurisdictions, as well as preservation of restitution and treatment pathways. A blocked domain is an administrative output; reduced access, fewer losses, and improved well-being are different outcomes. Predictions of inevitable displacement into unauthorized gambling and predictions of inevitable welfare improvement both exceed the evidence available within a month of the measure.

The commodification of economic hope clarifies the distributional issue underlying these arrangements. Clearly, the customer encounters a prospect of material improvement, while the operator faces a revenue opportunity, and affiliated institutions acquire financial commitments. Regulation changes the terms on which those expectations can be pursued. That connection is particularly relevant to development and peripheries because a given monetary loss does not carry the same consequence for households with different margins of security.

Nevertheless, although the present study does not demonstrate targeted exploitation of a particular income group, there are clear signals of stronger harms caused by gambling on more vulnerable population. Even though there are objective measures of vulnerability, the concept itself has multidimensional characteristics. For instance, in one of these dimensions, Brazilian household indebtedness has risen markedly since the 2000s, reaching 49% of income accumulated over the preceding 12 months in 2022 and surpassing 50%, at 50.1%, in 2026 for the first time since the Central Bank of Brazil's data series began. Moreover, loan quality has progressively deteriorated since the mid-2010s [57]. These developments constitute a complex and multidimensional problem that gambling may exacerbate, particularly among households already experiencing financial vulnerability. Likewise, although is still early to estimate a gradient in the effects of prohibition, some evidence starts to appear regarding precisely the channeling of available income by vulnerable groups into better use, such as expenditures with groceries [58].

Several limits follow from the design. The evidence is purposive, public, and unevenly disclosed across jurisdictions and organizations. News coverage favors visible disputes and prominent brands. Corporate statements are strategic communications, and court petitions present interested arguments. The short interval after prohibition makes long-term adjustment and outcomes unavailable. The absence of a credible counterfactual precludes causal claims about health, income, consumption, or voting. These limits narrow the findings to the institutional specification of duties and documented public conduct; they do not justify treating missing evidence as successful protection.

The general implication is that corporate ethics becomes more useful analytically when its evidentiary demands are made explicit. Permission can support responsible operation only if duties are observable and enforceable. Prohibition can protect customers only if withdrawal, restitution, and the prevention of unauthorized supply are themselves implemented. In either arrangement, public authority and corporate integrity depend on an institutional capacity to connect claims, decisions, and consequences.

Widening a bit this discussion, research on digital platforms for entrepreneurship and social innovation offers a useful application of Baumol's distinction between productive, unproductive, and destructive entrepreneurship. By connecting microentrepreneurs and social enterprises with knowledge, collaborative networks, and economic opportunities, these platforms can support entrepreneurial activities that contribute to sustainable local development [56]. From this perspective, gambling-related activities that generate social harm illustrate the need for institutional arrangements that redirect entrepreneurial effort toward socially productive uses. Because many people were attracted to gambling as if it was a way to increase income, as if it was some sort of digital entrepreneurial bet. Accordingly, alongside restrictions on harmful practices, access to training, finance, and networks can make productive alternatives more attractive. Such platforms therefore represent a potential channel for reallocating entrepreneurial talent and resources toward activities with broader social benefits in a society where digital media is each time more pervasive.

9 Concluding remarks

This article asked when responsible-gambling rhetoric becomes a verifiable organizational duty. The comparison involving Brazil and Great Britain shows why the answer cannot be derived from a corporate policy, the age of a statute, or the existence of a license. It requires procedures for recognizing risk, acting on it, assessing the response, and attributing failures. British regulatory provisions were selected by design in this comparative study as they make that sequence comparatively explicit, while their enforcement record also documents failures that continued under an established supervisory system.

Brazil's prohibition opened a different and unusually concentrated field of observation. Firms faced residual customer and reporting obligations while contesting the withdrawal of permission to operate. The available evidence records both visible closure and efforts to preserve legal access, commercial visibility, and political support. It warrants scrutiny of firms and intermediaries without equating political disagreement, common ownership, or access to a candidate with demonstrated misconduct.

The policy shock creates an opportunity for natural-experiment research, but suddenness is not the same as exogeneity. Within the present design, its contribution is to expose decisions and duties to structured comparison. While Lula's reelection strengthens an expectation of executive continuity, congressional consideration under the newcoming coalitions, judicial review, and actual implementation capacity still condition the durability and consequences of the measure. Already in November 2026, the Supreme Court started judicial review upon request of the gambling organizations and their representative associations [59]. Although the future of these gambling activities in Brazil may change again in the near or distant future, the events examined here form a sufficiently self-contained episode for assessing the relationships between corporate ethics, institutional capacity, and the regulation of online gambling-related harms in Brazil, with Great Britain providing a comparative perspective.

Selling hope as income is therefore understood as an institutional problem concerning the regulation of the relation between supply and demand in an area that can generate harm. Accordingly, clearly defined responsibilities are required alongside mechanisms that mitigate harm while directing, as a form of compensation, a more substantial share of gambling revenues toward improving social welfare if the ban is not maintained. Unquestionably, this area directly affects social welfare and is closely intertwined with financial governance in a globalized world. The integrity matrix presented in this article offers a way to examine whether protective claims survive contact with commercial incentives and policy reversal. The remaining road of empirical inquiry is to connect those claims to independently verified implementation and, ultimately, to the consequences borne by customers and their communities.

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