

THE BEGUR BULLETIN

MEDIA, ENTERTAINMENT & GAMING

APRIL - SEPTEMBER 2025

HALF YEARLY REGULATORY UPDATE



WELCOME TO THE BEGUR BULLETIN!

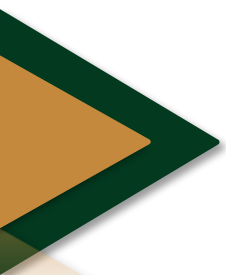
India's Media & Entertainment and Gaming sector has seen remarkable growth in 2024, with Media & Entertainment reaching INR 2.5 trillion (US\$29.4 billion), and the digital media and gaming driving 41% of revenues, according to the FICCI-EY Report 2024. The Gaming industry, valued at US\$3.8 billion in FY24, is projected to hit US\$9.2 billion by FY29 with a 20% CAGR, fuelled by 590 million gamers and robust smartphone penetration. Government measures such as the IT Rules 2021, the establishment of the AVGC Promotion Task Force, and the allowance of 100% FDI via the automatic route (as per Invest India) have provided regulatory clarity and boosted investor confidence. Further, streamlined regulations for OTT platforms, DTH services, and gaming, along with the creation of the National Centre of Excellence for AVGC, reflect India's commitment to fostering innovation and transforming the sector into a global hub.

The period from April 2025 to September 2025 saw key regulatory and judicial developments shaping India's Media & Entertainment and Gaming sectors. The *Promotion and Regulation of Online Gaming Act, 2025* introduced a nationwide ban on Real Money Games while promoting e-sports and online social games. In digital media, MIB issued advisories on accessibility compliance under the RPwD Act, clarified Rule 18 filing requirements, and directed OTT platforms to remove Pakistan-origin content and refrain from live coverage of defence operations. The Press Council of India reinforced norms against paid news and pre-poll/exit poll reporting, while draft TRP guidelines opened the television ratings sector to multiple agencies. Judicial rulings further emphasized influencers' rights and the protection of celebrity personality rights, highlighting the growing importance of reputation and identity in the digital and AI-driven era.

We value your thoughts and suggestions. If there is feedback on how we can improve The Begur Bulletin, we'd love to hear from you on communications@begurs.com. Your input helps us keep this platform insightful.

Enjoy reading, here's to staying informed, compliant, and capital-ready!

— Team Begur





LEGISLATIVE UPDATE

1. COMPLETE PROHIBITION ON OFFERING REAL MONEY GAMES (RMGs) ACROSS THE COUNTRY

The Promotion and Regulation of Online Gaming Act, 2025 (“**Act**”) was passed by both houses of the Parliament and received presidential assent in August, 2025, classifying all online games into the following:

- a. Online Money Games – Online games, whether based on skill or chance, played by a user through the deposit of money with an expectation of returns and involve any element of betting or wagering on the outcome of an event.
- b. E-Sports – Multi-sports, competitive and multiplayer contests between individuals or teams whose outcomes are based solely on skill (eg. Physical dexterity, mental agility and strategic thinking) and exclude any forms of betting and wagering
- c. Online Social Games – Online games played without staking money, valuables or any expectation of a monetary gain; may be accessed via subscription or one time fee and offered solely for the purposes of entertainment, recreation and skill development.

The Act ***prohibits the offering, aiding, abetting, inducing, or participating in any online money game.*** It further bans

any advertisements promoting such games and restricts banks and financial institutions from facilitating transactions related to payments for these games, with violations attracting fines, imprisonment, or both. On the other hand, the Act seeks to provide a major push to e sports and online social games given their rapid growth in India in recent years. Further, it has been proposed to establish an authority which shall register and regulate such games along with formulating policies and implementing measures for the promotion and development of the online gaming industry.

B&P View: The Act addresses important social issues such as increasing addiction among the youth resulting in significant financial indebtedness for vulnerable gamers. At the societal level, the Act seems like a step in the right direction towards protecting public well-being. Moreover, the judiciary has the task of adjudicating on the legality of the Act, addressing issues stretching from legislative competence to individual rights to broader implications for an entire sector.

For the investment community, however, the abrupt change has resulted in complete mayhem. Portfolio companies which were viewed as winning bets suddenly face having to completely pivot to a different business model or wind up operations, potentially resulting in a write off of billions in market value.



MINISTRY OF INFORMATION BROADCASTING

1. ADVISORY ON ADHERENCE WITH THE CODE OF ETHICS PRESCRIBED UNDER THE INFORMATION TECHNOLOGY (INTERMEDIARY GUIDELINES AND DIGITAL MEDIA, ETHICS CODE) RULES, 2021

On April 22, 2025, the Ministry of Information & Broadcasting (“MIB”) issued an advisory directing OTT platforms and their self-regulatory bodies to ensure strict compliance with accessibility mandates under the Rights of Persons with Disabilities Act, 2016 (“RPwD Act”) and the Information Technology (Intermediary Guidelines and Digital Media Ethics Code) Rules, 2021 (“IT Rules, 2021”). This advisory follows a Delhi High Court order dated December 19, 2024, in the case of *Akshat Baldwa & Anr. v. Maddock Films Pvt. Ltd. & Ors.*, which highlighted the urgent need for disabled-friendly features in digital content. OTT platforms are now expected to make reasonable efforts to implement accessibility services like subtitles, audio descriptions, and screen-reader compatibility to the extent feasible.

B&P View: This advisory marks a significant push towards inclusivity in India’s digital media space. It reinforces that accessibility requirements under the IT Rules and the RPwD Act are not optional but mandatory, urging OTT platforms and their self-regulatory bodies to treat them as binding obligations. This marks a shift towards formalising accessibility standards in India’s digital content ecosystem.

2. MINISTRY OF INFORMATION & BROADCASTING ISSUES CORRIGENDUM ON RULE 18 FILING DEADLINE FOR DIGITAL MEDIA

On April 24, 2025, the MIB has issued a corrigendum to its earlier Public Notice dated May 26, 2021 (F. No. A50013/31/2021-DM), issued under Rule 18 of the IT Rules, 2021. The corrigendum amends Paragraph 5 of the original notice, clarifying that: “*Publishers must submit the required information within 15 days of issuance of the notice in PDF format, duly signed by an authorized signatory, and email it to digital-media@mib.gov.in.*”

All other aspects of the original Public Notice remain unchanged. The appended formats continue to apply, specifying filing requirements for digital news publishers with traditional media presence, digital-only news publishers, and OTT platforms.

B&P View: The corrigendum signals the MIB’s continued emphasis on enforcing Rule 18 compliance and streamlining the registration process for digital publishers and OTT platforms. It reflects an intent to bring greater administrative oversight and accountability within the digital media ecosystem.

3. ADVISORY TO REFRAIN FROM LIVE COVERAGE OF DEFENCE OPERATIONS

On April 26, 2025, MIB issued an advisory directing all media outlets, digital



platforms, and individuals to refrain from real-time coverage or broadcasting of visuals related to defence operations or security force movements, citing national security concerns. The advisory, referencing past incidents like the Kargil war, 26/11 attacks, and Kandahar hijacking highlights the risks of unauthorised source-based reporting and live visuals, which could compromise operational safety. Citing Rule 6(1)(p) of the Cable Television Networks (Amendment) Rules, 2021, the MIB reiterates that live telecast of anti-terror operations is prohibited, and only official briefings by designated officers may be reported.

B&P View: The advisory signals the government's intent to balance press freedom with operational security. Given the potential risk of live media exposure during sensitive defense operations, this underscores the need for editorial prudence and regulatory compliance.

4. ADVISORY ON OTT PLATFORMS DIRECTED TO DISCONTINUE PAKISTAN-ORIGIN CONTENT CARRYING CONTENT HAVING ITS ORIGINS IN PAKISTAN

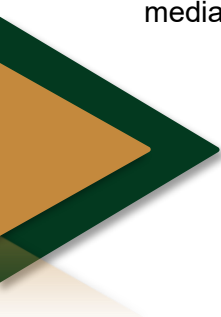
On May 08, 2025, the MIB issued an advisory directing all OTT platforms, digital streaming services, and intermediaries operating in India to immediately discontinue hosting or transmission of any content originating from Pakistan. This includes web series, films, songs, podcasts, and other curated media content. Citing concerns over

India's sovereignty, security, and public order, the advisory invokes the IT Rules, 2021, specifically Part II and Rule 3(1)(b), which mandate that no content threatening the unity, integrity, defence, or friendly relations of India may be published or transmitted.

B&P View: Issued in the wake of recent terrorist incidents, including the April 22, 2025 Pahalgam attack, this advisory reflects the government's heightened focus on content regulation in the interest of national security and public order. It underscores the need for platform-level vigilance and compliance to prevent dissemination of content perceived as detrimental to India's sovereignty and external relations.

5. DRAFT TRP GUIDELINES TO MODERNISE TV AUDIENCE MEASUREMENT

The MIB on July 02, 2025 released draft amendments to the 2014 Policy Guidelines for Television Rating Agencies, proposing to, remove restrictive clauses that barred new entrants, modify conflict of interest provisions to allow more flexible corporate structures and opening the sector to multiple agencies beyond the Broadcast Audience Research Council (BARC). These changes aim to foster competition, encourage investment by broadcasters/advertisers and enable adoption of technologies that capture connected TV, streaming and mobile viewership. Public and stakeholder feedback has been invited within 30 days.



B&P View: The draft amendment marks a decisive shift towards democratising India's TRP system. By lowering entry barriers and enabling new players, it could deliver more accurate, platform-agnostic data aligned with evolving viewing habits. For broadcasters and advertisers, this

opens opportunities for better audience insights and revenue planning. That said, the impact will hinge on how quickly new agencies are licensed and whether industry stakeholders invest in robust measurement infrastructure.



PRESS COUNCIL OF INDIA

1. ADVISORY TO PRINT MEDIA ON PAID NEWS DURING BYE-ELECTIONS

On June 16, 2025, the Press Council of India (“**PCI**”) issued an advisory to all print media outlets, urging strict adherence to the Norms of Journalistic Conduct, 2022, particularly with respect to paid news during the upcoming bye-elections in Gujarat, Kerala, Punjab, and West Bengal.

Defining paid news as any content published in exchange for payment in cash or kind, the PCI highlighted common indicators such as misquoting leaders, caste or political profiling of voters, identical political content across publications, verbatim reproduction of political material, biased headlines or photographs, premature electoral predictions, celebrity campaign coverage disguised as news, and unverifiable or one-sided reporting. While fact-based editorial assessments are permissible under Election Commission of India (ECI) guidelines, media houses have been cautioned to ensure fair, balanced, and independent coverage.

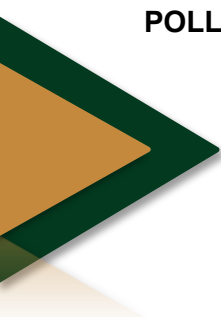
B&P View: The PCI’s advisory reinforces the need for editorial integrity during bye-elections. Though not legally binding, these guidelines act as a self-regulatory framework to stop paid news and uphold fair reporting, to promote fair bye elections.

2. ADVISORY ON PUBLICATION OF PRE-POLL AND EXIT POLL RESULTS

DURING BYE-ELECTIONS

On June 16, 2025, the PCI issued an advisory directing all print media to comply with Section 126A of the Representation of the People Act, 1951 and the PCI Norms of Journalistic Conduct, 2022, during the upcoming bye-elections in Gujarat, Kerala, Punjab, and West Bengal. The advisory prohibits the print media to refrain from publishing any pre-poll or exit poll results during the 48 hours preceding the bye-elections in Gujarat, Kerala, Punjab, and West Bengal, scheduled for 19.06.2025, with violations attracting penalties of up to two years’ imprisonment, fine, or both. The PCI also cautioned against misuse of media platforms for casteist, religious, or sponsored pre-poll propaganda, and mandated full disclosure of survey methodology and sponsorship.

B&P View: The PCI’s directive reinforces Section 126A compliance and imposes stricter obligations on print media during the pre-poll period, aiming to enhance transparency, curb sponsored reporting, and safeguard electoral integrity.



STATE SPECIFIC UPDATES

1. GOA NOTIFIES MEDIA REPRESENTATIVES ACCREDITATION RULES, 2025

On April 10, 2025, the Government of Goa notified the Goa Media Representatives Accreditation Rules, 2025, establishing a structured framework for accrediting journalists, editors, correspondents, and cameramen associated with recognized media organizations in the state. The Rules constitute a 14-member Press Accreditation Committee (PAC), chaired by the Director of Information & Publicity, with representation from the print, television, digital, and magazine sectors. Accreditation entitlements vary by media type: up to 10 for newspapers/TV channels, 3 for periodicals, and 1–4 for digital platforms, based on web traffic and IT Rules, 2021 compliance. Eligibility requires five years of journalistic experience or one year with a journalism degree, with special provisions for freelancers with 25+ years of experience. Accreditation is valid for two years, with procedural safeguards against arbitrary cancellation to protect press freedom.

B&P View: The Rules formalize press accreditation in Goa, ensuring structured media access to government information and events, while balancing eligibility on experience, qualifications, and digital reach metrics. Administered through the PAC, the framework offers accredited journalists official ID cards and potential access to benefits like medical and transport support, reinforcing both professional accountability

and freedom of the press.

2. HARYANA NOTIFIES HARYANA PREVENTION OF PUBLIC GAMBLING ACT, 2025

On April 9, 2025, the Haryana Government notified the Haryana Prevention of Public Gambling Act, 2025, aimed at curbing physical and digital gambling, including sports betting, within the state's territorial limits even without the operator's physical presence. It criminalizes games of chance while carving out a conditional exemption for games of skill, defined as those where success primarily depends on knowledge, training, and expertise. The law imposes strict penalties for match and spot-fixing, with imprisonment ranging from three to seven years and minimum fines of ₹5 lakhs. Liability extends beyond players to coaches, officials, and other match personnel. The Act also grants the State Government sole discretion to notify which games qualify as skill-based, rather than recognizing those already upheld by courts.

B&P View: While the Act seeks to curb gambling and enhance accountability in sports, its lack of a clear framework for recognizing online skill games has led platforms to suspend services in Haryana. The Act's discretionary provisions create legal ambiguity, clashing with central IT Rules, 2021, which advocate self-regulation. In the absence of a unified central mechanism, India's gaming industry faces an uneven regulatory landscape. Until clarity emerges, platforms and users must handle this uncertainty with caution, especially in states like Haryana

JUDICIAL UPDATES

1. DELHI HIGH COURT AFFIRMS RIGHT OF INFLUENCERS TO CRITIQUE BRANDS BACKED BY EVIDENCE

On April 28, 2025, the Delhi High Court upheld the right of social media influencers, including Arpit Mangal and others, to publish evidence-based criticism of brands. The case arose after the influencers posted lab-test-backed reviews alleging that San Nutrition's whey protein products contained less protein than advertised.

San Nutrition sought an interim injunction, alleging defamation and trademark misuse. The Court refused, holding that truthful, evidence-supported consumer reviews fall within the scope of free speech and consumer rights. It further clarified that such reviews do not constitute trademark infringement or unauthorized commercial use.

While the matter will proceed to trial, the ruling reinforces the legitimacy of fact-based influencer content and could shape future advertising and consumer protection standards in India.

B&P View: The Delhi High Court's order affirms that fact-based influencer speech is a protected extension of consumer rights and free expression. It sets a key precedent for brands, influencers, and regulators like ASCI, highlighting the growing importance of transparency and accountability in digital consumer advocacy.

2. MADRAS HIGH COURT UPHOLDS

TNOGA'S BAN ON LATE-NIGHT REAL MONEY GAMING AND AADHAAR MANDATE

On June 3, 2025, the Madras High Court upheld the Tamil Nadu Online Gaming Authority's (TNOGA) decision to ban Real Money Games (RMG) between 12 a.m. and 5 a.m., and to mandate Aadhaar verification for all players. The ruling came in response to petitions challenging Sections 5(2) and 14(1)(c) of the Tamil Nadu Prohibition of Online Gambling and Regulation of Online Games Act, 2022 and its 2025 regulations. It was ruled that the State is constitutionally empowered to regulate online games under Entries 6 (public health) and 26 (trade and commerce) of the State List. The Court cited rising public health concerns, including 47 suicide cases in Tamil Nadu between 2019–2024 linked to online gaming addiction, and emphasized the heightened risks in digital formats, such as anonymity and addictive interfaces. Aadhaar-based age verification was upheld for its reliability and role in preventing underage access.

B&P View: The Madras High Court judgment affirms state-level regulatory authority over digital RMGs on public health grounds, endorsing a paternalistic yet targeted approach. It could encourage similar measures in other states and intensify demands for a centralized online gaming regulatory framework.

3. ALLAHABAD HIGH COURT ORDERS COMMITTEE TO EXPLORE ONLINE GAMING REGULATION

On June 12, 2025, the Allahabad High Court directed the Uttar Pradesh

government to form a High-Powered Committee to assess the need for legislation regulating online gaming and betting. Headed by Prof. KV Raju, Economic Advisor to the state, the committee will include senior bureaucrats and domain experts.

The Court observed that the Public Gambling Act, 1867, is outdated and ineffective in addressing digital gambling, fantasy sports, and cross-border gaming operations. It flagged issues like minimal penalties, jurisdictional gaps, and the lack of legal clarity on online games' status. Citing psychological and social harms, particularly among youth, and risks of money laundering and financial fraud via offshore platforms, the Court called for a technology-driven, robust legislative framework. While the Court quashed the pending proceedings against the accused due to procedural lapses, it permitted a fresh investigation in accordance with law.

B&P View: The Allahabad High Court's directive reflects judicial recognition of the inadequacy of colonial-era gambling laws in addressing the modern digital gaming ecosystem. By pushing for a high-level expert committee the Court underscores the urgency of creating a unified, contemporary legal framework. This move is likely to increase state-level legislative reforms.

4. DELHI HIGH COURT UPHOLDS PERSONALITY RIGHTS OF SEVERAL BOLLYWOOD CELEBRITIES

The Delhi High Court, on September 12, 2025 granted an interim injunction in favour of Bollywood actor, Abhishek Bachchan, restraining websites, e-commerce platforms and YouTube channels from unauthorized use of his name, image, likeness and persona. The Court held that such misuse amounted to infringement of his personality rights and directed blocking/removal of infringing products and AI-generated content. This order follows a similar one passed in favour of Aishwarya Rai Bachchan on September 09, 2025, underscoring the judiciary's consistent recognition of celebrities' personality rights.

B&P View: This order highlights the growing judicial emphasis on safeguarding personality rights in India, especially in the age of digital platforms and AI-generated content. With increasing misuse of celebrity personas for commercial and reputational harm, such rulings reinforce the economic and moral value of one's identity. Going forward, we expect more litigation and policy focus in this area, with Personality Rights becoming a critical aspect of brand protection, reputation management, and IP strategy for public figures.

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Latest Awards and Recognitions

RSGI Resight (RSG India)

IBLJ A List
A List (2023-2024)

ALB India Law Awards 2025
Notable Firm (2024)

Legal 500
Private Equity (including Venture Capital) - Tier 5 (2025)

IFLR1000 (34th Edition) 2024

1. Rajesh Begur B Ranking: Leading Lawyer – Highly Regarded
2. Firm Ranking: Recommended Firm
3. Southern Asia, Australasia and Central Asia Ranking: Highly Regarded

Corporate INTL Global Awards

Cross Border Private Equity Transactions Law Firm of the Year in India - 2025

Forbes India – Legal Powerlist 2023

Top Law Firm (above 10 years' experience)

Asia Law 2022

Notable Firm – Private Equity, Investment Funds, Banking and Finance, Corporate and M&A

Global Law Expert 2021

Cross Border Private Equity Transactions Law Firm of the year

RSG Consulting 2019

Top 40 Indian Law Firm

