



Responsible Gaming Policy.

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1.0 VERSION CONTROL AND OWNERSHIP

Version	Version Description	Author	Reviewer	Date Approved	Description
1.0	Creation of Policy	BetU Curaçao B.V Compliance	Jason Dean		Initial Creation of Document

Ownership

	Primary	Secondary
Name	Ryan Mueller	
Designation	Chief Compliance Officer	
Department	Phantom Compliance	
Email	ryan@phantomcompliance.com	

2.0 RESPONSIBLE GAMING POLICY FOR UBET

At UBet, we are committed to promoting responsible gambling and ensuring a safe and enjoyable experience for all our users. Gambling should always be a form of entertainment, not a means to generate income or escape financial difficulties. We encourage our players to gamble responsibly and provide tools and resources to help maintain control.

2.1 COMPLIANCE WITH TOBIQUE GAMING REGULATIONS

UBet strictly adheres to all gaming laws and licensing conditions in Tobique. Our policies align with regulatory requirements, ensuring fair and transparent gaming operations. Regular audits will be conducted to maintain compliance.

2.2 OUR COMMITMENT TO RESPONSIBLE GAMING

We support responsible gambling by:

- Implementing strict Know Your Customer (KYC) measures to verify player identity and prevent underage gambling.
- Providing tools to set deposit, loss, and wagering limits.
- Offering self-exclusion options, including cooling-off periods and permanent account closure.
- Utilizing AI-based monitoring tools to detect problem gambling behaviors.
- Ensuring all marketing and promotions are fair, transparent, and do not target vulnerable individuals.
- Partnering with responsible gambling organizations to provide professional support and assistance.

2.3 GUIDELINES FOR RESPONSIBLE GAMBLING

To help maintain a healthy approach to gambling, we recommend the following:

- Set Limits – Decide in advance how much money and time you are willing to spend.
- Gamble for Fun – Treat gambling as entertainment, not as a way to make money.
- Avoid Chasing Losses – Accept losses as part of the game and avoid excessive betting.
- Balance Gambling with Life – Ensure gambling does not interfere with work, relationships, or daily responsibilities.
- Stay in Control – Avoid gambling under the influence of alcohol, drugs, or medication.
- Take Breaks – Regular pauses help maintain perspective and prevent excessive play.

We go beyond minimum standards by:

- Complying with Tobique's Gaming Act 2023 and Curaçao eGaming Laws.
- Using AI-driven tools to detect risky behavior (e.g., rapid deposits, chasing losses).
- Training staff to intervene with at-risk players.
- Banning credit-based gambling and verifying the source of funds.
- Partnering with Tobique Gambling Support Network for local assistance.
- Set Limits – Use our mandatory deposit/loss limits (customizable per session/day/month).
- Time Alerts – Receive warnings every 30/60/90 minutes of play.
- No Underage Gambling – Strict 18+/21+ verification (per Tobique law).
- No Intoxication – Block play if substance use is suspected.
- Self-Exclusion – Opt for 24-hour, 7-day, 30-day, or permanent bans.

2.4 PLAYER MONITORING SYSTEM

UBet employs a sophisticated player monitoring system designed to detect patterns of problematic gambling behavior:

- **Automated Monitoring:** Our system continuously analyzes playing patterns, including frequency, duration, and betting behaviors.
- **Risk Indicators:** We track specific risk indicators that may suggest problem gambling, including:
 - Increasing deposit amounts over time
 - Multiple deposit methods used in short periods
 - Gambling at unusual hours
 - Dramatic changes in betting patterns
 - Frequent changes to deposit limits
 - Extended gambling sessions without breaks
 - Chasing losses with larger bets
- **Intervention Procedures:** When concerning behaviors are detected, our system triggers:
 - Customized responsible gambling messages
 - Check-in communications from our trained support team
 - Temporary account restrictions if necessary
 - Suggested cooling-off periods or limit reductions
- **Manual Review:** Our responsible gambling team regularly reviews flagged accounts and may proactively reach out to players showing signs of distress.

2.5 AGE VERIFICATION PROCEDURES

UBet maintains strict age verification processes to prevent underage gambling:

- **Initial Verification:** During registration, all players must provide their date of birth and confirm they are of legal gambling age (minimum 19 years in Tobique).
- **Secondary Verification:** Before any withdrawal is processed, players must complete our Know Your Customer (KYC) process, which includes submitting government-issued photo identification verifying their age.
- **Ongoing Verification:** We conduct random verification checks on active accounts.
- **Failed Verification Consequences:** If a player is found to be underage:
 - The account will be immediately suspended
 - All deposits will be returned
 - Any winnings will be forfeited
 - The incident will be reported to the appropriate authorities
- **Technological Measures:** We employ advanced verification technologies including ID document scanning, facial recognition matching, and database cross-checking.
- **Regular Audits:** Our age verification procedures are regularly audited for effectiveness and compliance with Tobique regulations.

2.6 SELF-ASSESSMENT & SUPPORT RESOURCES

If you answer "yes" to any of the following, you may need to reassess your gambling habits:

- Do you gamble to escape stress or problems?
- Have you lied about your gambling activities?
- Have you borrowed money to gamble?
- Has gambling affected your relationships or work?
- Do you need to bet larger amounts to get the same excitement?

If you need help, we recommend:

- Responsible Gambling Council (www.responsiblegambling.org)
- Gamblers Anonymous (www.gamblersanonymous.org)
- BeGambleAware (www.begambleaware.org)

Tobique Region Support:

- Tobique First Nation Wellness Center:
 - Phone: (506) 273-5430
 - Fax: 506) 273-5428 or (506) 273-4402
 - Email: health.director@neqotkukhealth.ca
- New Brunswick Gambling Support Network: (1-800-461-1234)
- Regional Addiction Services: [phone number]
- Problem Gambling Helpline (24/7):
 - Help is available by phone call, text message, or online chat. Call **1-800-GAMBLER** Call the 24-hour helpline at 1-800-426-2537. Text 1-800-522-4700 Text the 24-hour helpline at 1-800-522-4700. Chat Chat with the 24-hour helpline.

National Resources:

- Problem Gambling Help Line (Canada): 1-800-463-1554
- Gamblers Anonymous Canada: (www.gamblersanonymous.org)
- Canadian Mental Health Association: (<https://cmha.ca/>)

2.7 SUPPORT & SELF-EXCLUSION TOOLS

If gambling becomes a problem, UBet provides the following tools:

- Deposit Limits – Set daily, weekly, or monthly spending limits.
- Reality Checks – Receive notifications on time spent gambling.
- Self-Exclusion – Temporarily or permanently exclude yourself from playing.
- Third-Party Exclusion – Family members can request restrictions on behalf of at-risk players.
- Account Closure – Contact support to close your account if needed.

UBet reserves the right to proactively restrict play if we detect problem gambling behaviors.

2.8 AI-BASED PROBLEM GAMBLING DETECTION

UBet uses AI-driven monitoring to detect problem gambling behaviors, such as:

- Unusual transaction patterns
- Rapid betting activity
- Repeated self-exclusion attempts
- High-risk spending behaviors

When detected, UBet may trigger interventions, including account restrictions and mandatory cooling-off periods.

2.9 RESPONSIBLE MARKETING & ADVERTISING RESTRICTIONS

UBet adheres to strict ethical standards in all marketing activities:

- **Truth and Transparency:** All marketing materials present gambling in a factual, balanced manner without exaggerating the chances of winning.
- **No Vulnerable Targeting:** We never target our advertising toward:

- Individuals under the legal gambling age
- Self-excluded players
- Vulnerable populations
- Problem gamblers
- **Promotional Limitations:**
 - All bonuses include clear, transparent terms and conditions
 - No promotions encouraging excessive play or chasing losses
 - Reasonable wagering requirements for all offers
 - No promotions marketed as financial solutions
- **Responsible Gambling Messaging:** All marketing materials include:
 - Responsible gambling messages
 - Age restrictions
 - Links to responsible gambling resources
 - "Play Responsibly" logo and messaging
- **Timing Restrictions:** No marketing communications are sent during night hours (12 AM - 6 AM).
- **Content Review:** All marketing materials are reviewed by our compliance team before publication.
- **Social Media Guidelines:** Strict adherence to age-gating and responsible content on all social platforms.
- **Compliance with Tobique Standards:** All marketing activities comply with Tobique's specific advertising regulations for gaming operators.

2.10 DEDICATED RESPONSIBLE GAMBLING TEAM

All UBet staff members receive comprehensive training on responsible gambling:

- **Initial Training:** All new employees undergo mandatory responsible gambling training within their first month of employment.
- **Role-Specific Training:** Staff in customer-facing roles receive additional specialized training on:
 - Identifying signs of problem gambling
 - Appropriate intervention techniques
 - Communication strategies for vulnerable customers
- **Refresher Training:** All staff complete refresher training every six months.
- **Leadership Training:** Managers receive additional training on creating a culture of responsible gambling.
- **Certification:** Staff must pass a certification test demonstrating their understanding of responsible gambling principles.
- **Training Documentation:** Records of all training sessions are maintained and available for regulatory inspection.
- **Third-Party Experts:** Training is developed and delivered in partnership with recognized responsible gambling organizations.

2.11 CULTURAL CONSIDERATIONS

UBet recognizes and respects the cultural context of the Tobique region:

- **Indigenous Awareness:** We acknowledge the specific gambling concerns within Indigenous communities and provide culturally appropriate resources.
- **Local Language Support:** Responsible gambling information is available in English, French, and Maliseet.
- **Community Engagement:** We actively engage with the Tobique community to understand specific concerns and adapt our responsible gambling approach accordingly.
- **Cultural Sensitivity Training:** Our staff receives training on cultural sensitivity specific to the Tobique region.
- **Community Support:** A portion of our responsible gambling budget is allocated to supporting local addiction services in the Tobique area.
- **Custom Materials:** Responsible gambling materials reflect cultural considerations and values important to the Tobique community.

- **Elder Consultation:** We consult with community elders on appropriate communication strategies for responsible gambling messages.

2.12 DATA PROTECTION AND PRIVACY

UBet is committed to protecting player data, particularly sensitive information related to responsible gambling:

- **Data Security:** All responsible gambling data, including self-exclusion requests and limit settings, is encrypted and stored securely.
- **Limited Access:** Only authorized personnel have access to responsible gambling data on a need-to-know basis.
- **Retention Policies:** Self-exclusion data is retained for the duration of the exclusion period plus an additional period as required by Tobique regulations.
- **No Marketing:** Self-excluded players are automatically removed from all marketing communications.
- **Privacy Compliance:** Our data practices comply with all applicable privacy regulations including Tobique's privacy requirements.
- **Consent:** We obtain explicit consent before collecting any responsible gambling-related data.
- **Third-Party Sharing:** When necessary for multi-operator exclusion schemes, data is shared securely and in compliance with all applicable regulations.
- **Data Subject Rights:** Players can request access to their responsible gambling data at any time.

2.13 COMPLIANCE WITH TOBIQUE REGULATIONS

UBet is committed to full compliance with all Tobique gaming regulations:

- **Licensing Requirements:** We maintain full compliance with all responsible gambling requirements specified in Tobique gaming licenses.
- **Regulatory Updates:** We closely monitor and promptly implement any changes to Tobique's responsible gambling regulations.
- **Regular Consultation:** We maintain open communication with Tobique gaming authorities regarding responsible gambling practices.
- **Documentation:** All required documentation is maintained and readily available for regulatory inspection.
- **Responsible Gambling Fund:** We contribute the required percentage of revenue to Tobique's responsible gambling fund.
- **Technical Standards:** Our systems comply with all technical requirements for responsible gambling tools specified by Tobique regulations.
- **Advertising Compliance:** All marketing activities strictly adhere to Tobique's advertising standards for gaming operators.
- **Report Submissions:** All required reports are submitted accurately and on time.

2.14 CONTACT US

If you need assistance with responsible gambling tools or have concerns, contact our support team:

- **Email:** support@ubet.io

Remember: Gambling should be fun. Play responsibly.

3.0 POLICY REVIEW

This policy shall be reviewed and updated annually to ensure its continued relevance and effectiveness. The review will be conducted by the Compliance Officer and approved by senior management.

Trigger Events:

In addition to the annual review, this policy will be reviewed and, if necessary, updated promptly in response to the following trigger events:

- Significant changes in relevant laws, regulations, or regulatory guidance.
- Major changes in the business operations, structure, or strategic direction of the organization.
- Identification of deficiencies in the policy or its implementation during audits, compliance reviews, or incidents of non-compliance.
- Emergence of new responsible gambling best practices or standards.
- Feedback from problem gambling treatment professionals or organizations.
- Significant incidents related to problem gambling among our users.
- Changes to Tobique's specific gaming regulations.

Documentation and Approval:

All reviews and updates to this policy will be documented, including the rationale for changes and senior management's approval of the revised policy. The Compliance Officer is responsible for ensuring that all employees are informed of and trained on any changes to the policy.

Pending the occurrence of a trigger event, the next scheduled review and update of this policy will take place in **April 2026**.

A man with curly hair and sunglasses is celebrating a win at a casino table. He is holding two aces (Ace of Spades and Ace of Hearts) and a large stack of chips. He is also holding a smartphone with a Ubet case. The background is a blue-tinted image of a casino table with cards and chips.

UBET

