

RESPONSIBLE GAMING POLICY

Red Lane B.V.

Date of issue: 25.06.2026

1. INTRODUCTION

Red Lane B.V. is committed to providing a safe, fair, and responsible gaming environment for all customers. The Company recognizes its duty to minimize the risk of gambling-related harm and to implement effective safeguards in line with Curaçao Gaming Authority (CGA) requirements and international responsible gambling standards.

This policy applies to all gaming products including Casino, Live Casino, Sportsbook, and Virtual Sports.

2. MANDATORY RESPONSIBLE GAMING ELEMENTS

2.1. AGE VERIFICATION (MANDATORY)

The Company strictly prohibits access to gambling services by individuals under the legal age (18+ or higher depending on jurisdiction).

Controls include:

- Mandatory KYC verification before account activation
- Government-issued ID verification (passport / national ID)
- Date of birth validation
- Address verification where required
- Payment method ownership verification
- Automated and manual compliance review

Enforcement:

- Accounts failing verification are blocked or suspended
- Any suspected underage accounts are immediately frozen pending investigation
- Funds may be withheld pending compliance review

3. INFORMATION ACCESSIBILITY

The Company ensures that responsible gaming information is easily accessible to all customers at all times.

Available information includes:

- Responsible Gaming Policy (published on website)
- Self-exclusion instructions
- Deposit limit tools
- Problem gambling support guidance
- Contact details for support services

Accessibility requirements:

- Information is available via website footer and user account dashboard
- Content is written in clear and understandable language
- Available 24/7 without restriction
- Accessible on desktop and mobile platforms

4. PLAYER SELF-ASSESSMENTS

The Company provides self-assessment tools to help customers evaluate their gambling behavior.

Self-assessment framework includes:

- Standardized questionnaires assessing gambling risk behavior
- Indicators such as:
 - Frequency of play
 - Loss chasing behavior
 - Emotional dependency on gambling
 - Financial impact awareness

Outcome categories:

- Low Risk
- Medium Risk
- High Risk

Actions based on results:

- Low risk: continue normal play
- Medium risk: display warnings and responsible gaming tips
- High risk: recommend cooling-off or self-exclusion options

5. BEHAVIOUR TRACKING

The Company monitors player behavior using automated and manual systems to detect risky gambling patterns.

Monitoring includes:

- Deposit frequency and volume
- Betting patterns and stake escalation
- Rapid deposit–loss cycles
- Chasing losses behavior
- Extended play sessions
- Multiple payment methods usage
- Withdrawal patterns inconsistent with gameplay

Risk triggers may result in:

- Automated responsible gaming warnings
- Temporary restrictions
- Manual compliance review
- Escalation to Compliance Officer / MLRO

6. COOLING-OFF PERIODS

Players may voluntarily request a temporary break from gambling.

Cooling-off options:

- 24 hours
- 7 days
- 30 days

During cooling-off:

- Account access is suspended
- Deposits and wagering are blocked
- Marketing communications are paused

Reactivation:

- Automatic after expiry period
- No early reactivation permitted during cooling-off period

7. SELF-EXCLUSION

Self-exclusion allows customers to block access to their account for extended periods.

Self-exclusion options:

- 6 months
- 1 year
- Permanent exclusion

Controls:

- Immediate account closure upon activation
- Blocking of new account registration attempts
- Inclusion in internal exclusion database
- Blocking of marketing communications

Enforcement:

- No reactivation permitted during exclusion period
- Permanent exclusion cannot be reversed

8. DEPOSIT LIMITS

The Company provides mandatory and voluntary deposit limit tools.

Types of limits:

- Daily deposit limits
- Weekly deposit limits
- Monthly deposit limits

Features:

- Customers may reduce limits immediately
- Increases require a mandatory cooling period (e.g., 24–72 hours)
- Limits apply across all gaming products

Purpose:

- Prevent excessive spending
- Reduce risk of gambling harm
- Promote responsible play

9. CONSUMER ADVERTISING AND MARKETING

The Company ensures all advertising is conducted responsibly.

Marketing rules:

- No targeting of minors
- No misleading or deceptive messaging
- Clear responsible gaming warnings included
- No promotion of gambling as income generation
- No targeting of vulnerable individuals

Channels:

- Email marketing
- Website banners
- Affiliate marketing (controlled and monitored)
- Social media campaigns

Controls:

- Marketing compliance review before publication
- Affiliate partner monitoring
- Opt-out mechanisms for customers

10. TRAINING OF EMPLOYEES

All relevant employees receive mandatory Responsible Gaming training.

Training includes:

- Identification of problem gambling behavior
- Customer interaction procedures
- Escalation protocols
- Use of responsible gaming tools
- Regulatory obligations under CGA framework

Frequency:

- Onboarding training before operational access
- Annual refresher training
- Ad hoc updates upon regulatory changes

Recordkeeping:

- Training logs maintained
- Attendance records stored for audit purposes

11. GOVERNANCE AND OVERSIGHT

Responsible Gaming implementation is overseen by:

- Compliance Officer
- MLRO
- Senior Management / Board of Directors

Regular reporting is conducted on:

- Self-exclusion volumes
- High-risk customers
- Intervention actions
- Behavioral monitoring outcomes

12. POLICY REVIEW

This policy is reviewed:

- At least annually
- Upon regulatory updates from CGA
- Upon introduction of new gaming products
- Following identified responsible gaming incidents

13. APPROVAL

Approved by:

Kurason Trust Curaçao N.V.
Managing Director: Mr. Jonathan Heymans

Date: 25.06.2026