

Responsible Gaming Policy

Aspera Operations B.V.

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1. Objectives

Aspera Operations B.V. is committed to maintaining gambling as a safe and enjoyable form of entertainment, while fully complying with the Curaçao Gaming Authority (CGA). We recognize that most players gamble responsibly, but some may be vulnerable to gambling-related harm. This Policy outlines our framework for responsible gaming, describing how we prevent underage gambling, identify at-risk players, and provide tools to help players stay in control.

The objectives of this Policy are:

- To promote gambling as entertainment, not as a way to make money or solve financial problems.
 - To prevent gambling-related harm by identifying and protecting vulnerable players.
 - To provide effective player support tools, including self-exclusion, limits, and reality checks.
 - To ensure compliance with the National Ordinance on Games of Chance (LOK) and CGA Responsible Gaming Guidelines.
 - To integrate responsible gaming into wider compliance functions, including AML/CFT monitoring and complaints handling.
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2. Player Protection and Support

Aspera provides accessible tools so players can manage their gambling responsibly. These include self-assessment questionnaires, access to a detailed record of their betting and wagering history including timestamps of transactions from the date the account was opened and tools for temporary or permanent restrictions. Players are encouraged to review their gambling behaviour regularly and use available safeguards.

In accordance with CGA requirements, we ensure:

- **Age Verification:** During registration, all players must confirm they are 18 or older through a date-of-birth declaration and an “I am over 18” confirmation. Age verification is conducted in line with the CGA’s Know Your Customer and AML requirements and must include, at a minimum, verification through a valid government-issued ID (passport, national ID, or driver’s license). Where necessary, additional verification

measures—such as payment-method confirmation, open-source checks, or secondary documentation—may be applied.

- Self-Assessment Tools: Access to the Gamblers Anonymous 20 Questions and the CAGE test.
 - Cooling-Off Periods: 24 hours, 7 days, 1 month, or 3 months, activated instantly online.
 - Self-Exclusion: 1, 3, 5, 10 years, or lifetime. Exclusion takes effect immediately and is recorded in a dedicated register retained for at least 7 years. Upon activation of total self-exclusion across all verticals, any remaining funds must be refunded to the original payment method within two business days (subject to AML policy requirements). If a self-excluded individual or a minor is found to have accessed gambling, all deposited funds (except AML-frozen amounts) must be refunded within two business days, and a detailed report submitted to the CGA within five working days.
 - Limits: Deposit, loss, and time-based limits adjustable at any time. Tightening is immediate; relaxation takes effect after 7 days. If a limit or exclusion impacts an active wager or gameplay, the restriction applies immediately after the relevant tournament, wager, or event concludes.
 - Reality Checks: On-screen reminders displaying session duration, winnings, and losses, with an option for players to take a break.
 - Support Resources: Direct links to GamCare, GambleAware, Gamblers Anonymous, and local market resources.
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3. Awareness and Education

Aspera ensures that responsible gaming information is clear, accessible, and visible across its platform. The Responsible Gaming Policy is available on the homepage, footer, and Terms & Conditions, in English and in the languages of our target markets. Players are reminded regularly of safe gambling practices.

In compliance with CGA's advertising restrictions:

- Marketing never targets minors or vulnerable groups.
- Gambling is never advertised as a financial solution or investment.
- No misleading information is given about skill influencing chance-based games.
- All marketing includes responsible gaming messages.
- Self-excluded and cooling-off players are excluded from promotional lists.

The website footer includes:

- “No Under 18” warning.
 - Operator’s name and registered address.
 - License number.
 - CGA digital seal.
 - Link to this Responsible Gaming Policy.
 - Links to gambling support organizations.
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4. Monitoring and Intervention

We actively monitor player behaviour using both automated tools and staff oversight to identify potential gambling-related harm. Behavioural triggers include sudden increases in deposits, unusually long sessions, frequent withdrawal reversals, or repeated changes to gambling limits.

Our intervention process includes:

- Detection: AI/analytics and frontline staff identify risk behaviour.
 - Regulatory Compliance: The operator is prohibited from allowing an individual who is reasonably considered a Vulnerable Person to participate in games of chance, in accordance with Article 1.4(e) LOK.
 - Direct contact: Trained staff reach out sensitively to discuss tools available. Direct player interactions regarding behaviour must be documented within the operator's Player Account Management system, including indicators of concern and actions taken.
 - Intervention: Application of limits, suspension, or self-exclusion where appropriate. Players exhibiting at-risk behaviour must be informed about responsible gaming tools, including deposit limits, time-outs, and self-exclusion
 - Escalation: Escalation: Any problematic behaviour identified must be escalated to the Compliance Officer or Responsible Gaming Officer who must assess each case and determine whether further restrictions, exclusions, or responsible gaming interventions are necessary. Severe cases reported to the Responsible Gaming Officer and documented for CGA review.
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5. Staff Training

Staff are trained to identify and respond to responsible gaming concerns. This training covers recognizing risky behaviour, handling Responsible Gaming complaints, and referring players to support services. Training is mandatory for employees, affiliates, marketing partners, and social media influencers

Key training measures include:

- Mandatory induction training for new employees.
 - Annual refresher training for customer service, compliance, and marketing staff, affiliates, marketing partners, and social media influencers
 - Specialist escalation training for responsible gaming officers.
 - Training records maintained for audit and CGA inspection.
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6. Complaints Handling

Complaints relating to Responsible Gaming are prioritized under the Player Complaints Policy. Such complaints are acknowledged within two business days and resolved within five business days wherever possible.

In line with CGA requirements:

- Acknowledgement within 2 business days for Responsible Gaming complaints.
 - Resolution within 5 business days, or explanation if delayed.
 - ADR referral provided free of charge if unresolved.
 - Complaint records maintained in a ledger and reported to CGA twice yearly.
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7. Governance and Review

The Compliance Officer currently fulfils the role of Responsible Gaming Officer until a dedicated officer is appointed. This role ensures the policy is applied consistently and effectively across all operations.

Governance measures include:

- Annual report on Responsible Gaming effectiveness submitted to Executive Management no less frequently than once every twelve (12) months. This report shall include an assessment of the effectiveness of the policy and related operational procedures, and provide recommendations to management as to proposed operational or policy enhancements
 - CGA notifications of significant policy changes.
 - Annual review of this Policy or sooner if required by regulation.
 - Updated versions published on the Operator's website and submitted to the CGA.
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8. Contact

For Responsible Gaming support, players may contact Aspera Operations B.V. via:

- Email:- compliance@aspera-operations.com
- Live chat: 24/7 customer support (subject to availability).
- CGA contact: Curaçao Gaming Authority – onlinegaming@gcb.cw

External resources for problem gambling include:

- GamCare – www.gamcare.org.uk
- GambleAware – www.begambleaware.org
- Gamblers Anonymous – www.gamblersanonymous.org