

Responsible Gaming Policy for Licensed Operators

Effective Date: March 2026

In Accordance with the Curaçao Gaming Authority (CGA) Player Responsible Gaming Policy
Guidelines

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1 Definitions

CGA means Curacao Gaming Authority.

Cooling Off means a pre-determined period that can comprise hours, days or months which is set by the player during which time the player may not place any wagers whatsoever.

Games of Chance means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker

LOK is the National Ordinance on Games of Chance law of Curacao.

Marketing, promotion and advertising refer to all resources, messages and media that promote the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns.

Mandatory Requirements are the basic elements of a Responsible Gaming policy that must be implemented by all operators. These elements must reflect the target markets and players of the operator.

Minor means any person under the age of 18

Operator – YouGMedia B.V., holder of a B2C license from the Curacao Gaming Authority.

Self-exclusion is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator.

Vulnerable Person is defined in the Clause 1.1 (h) of the LOK as

1. Under eighteen years of age.
2. Has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people.
3. Has been banned from playing any Game of Chance either by force or at his or her own request.
4. Has been declared bankrupt.

2 Policy Overview

YouGMedia B.V. (“the Operator”) is a duly registered company with registration number 153269, with its registered address at Seru Loraweg 17 C, Curaçao. The Company is authorized by the Government of Curaçao to conduct gaming operations under the auspices of License Number OGL/2024/107/0914 (hereinafter referred to as “the Operator” or “YouGMedia”).

YouGMedia is committed to maintaining a transparent, fair, and efficient framework for the management and resolution of player complaints and disputes. This Responsible Gaming Policy (“the Policy”) has been developed in strict accordance with the requirements of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, “LOK”), as enforced by the Curaçao Gaming Authority (CGA).

This Policy outlines the procedures for the submission, processing, and resolution of complaints made by players. It ensures players have access to a clear, impartial, and accessible complaints process, including free Alternative Dispute Resolution (ADR) services as mandated by the CGA. Non-compliance with this Policy may result in enforcement action by the CGA under its regulatory and supervisory mandate.

This Policy is incorporated by reference into YouGMedia’s Terms and Conditions, available on the Operator’s official website: www.fonbet.com. Players are encouraged to review this Policy in conjunction with the Terms and Conditions to fully understand their rights and obligations.

This Policy does not replace or override applicable provisions of private law, including but not limited to the relevant articles under Book 6 of the Civil Code of Curaçao concerning general terms and conditions. The Operator remains accountable for full compliance with all relevant legal obligations under civil law and encourages players to seek independent legal advice where appropriate.

2.1 General Responsible Gaming Policy

YouGMedia B.V. is committed to promoting responsible gambling and ensuring that online gaming remains a form of entertainment rather than a source of harm. Responsible Gaming principles are integrated into the company’s operational and business framework in accordance with the requirements of the Curacao Gaming Authority (CGA) and the National Ordinance on Games of Chance (LOK).

YouGMedia B.V. takes proactive steps to protect Vulnerable Persons and to promote responsible gambling behaviour among its players. The company aims to minimize the risk of problem gambling by implementing effective policies, procedures, and technological safeguards.

As part of this commitment, YouGMedia B.V. ensures that:

- A clear and transparent Responsible Gaming Policy is publicly available and easily accessible to all players on the website.
- Players are provided with Responsible Gaming tools and informational resources designed to help them manage their gambling activity responsibly.
- Monitoring mechanisms and behavioural tracking systems are implemented to identify and address signs of problematic gambling behaviour at an early stage.
- The company fully complies with all regulatory reporting, monitoring, and auditing obligations required by the Curacao Gaming Authority.
- In line with responsible gaming principles and regulatory requirements, YouGMedia B.V. does not offer credit to players for the purpose of wagering.
- Compliance with this Responsible Gaming Policy is a mandatory requirement under the LOK regulatory framework. Any failure to adhere to these standards may result in enforcement actions by the Curacao Gaming Authority (CGA) in accordance with its regulatory monitoring and compliance procedures.

2.2 High Risk Business Model

The Curacao Gaming Authority (CGA) requires operators whose business models include elements that may present a higher level of risk to implement additional safeguards within their Responsible Gaming framework.

Where applicable, YouGMedia B.V. acknowledges that certain operational activities may involve increased risk factors, including but not limited to cryptocurrency transactions, high-value players (VIP or high rollers), agent or intermediary accounts, and other similar gaming models. In such cases, the company ensures that its Responsible Gaming policies and internal controls are appropriately designed to address and mitigate the risks associated with these activities.

YouGMedia B.V. therefore commits to implementing enhanced monitoring procedures, tailored risk assessments, and additional responsible gaming controls where high-risk elements are present within its operations. These measures are intended to ensure that player protection, transparency, and regulatory compliance remain a priority, while minimizing the potential for gambling-related harm.

The company will regularly review and update its policies and operational procedures to ensure that any high-risk components of its business are managed responsibly and in accordance with the requirements and expectations of the Curacao Gaming Authority (CGA).

2.3 Non-Retail Model

This Responsible Gaming Policy primarily applies to retail players who access and participate in the gaming services provided by YouGMedia B.V. The policy does not specifically apply to non-retail gaming or betting activities, which may include, but are not limited to, professional players, organized betting groups, or syndicates that operate under different commercial or contractual arrangements.

However, even in such circumstances, YouGMedia B.V. remains committed to upholding general Responsible Gaming principles. Appropriate safeguards, monitoring practices, and compliance procedures will continue to be applied in a manner consistent with the nature of the business model and in accordance with the expectations of the Curacao Gaming Authority (CGA) and the applicable provisions of the National Ordinance on Games of Chance (LOK).

3 Mandatory Requirements

In order to maintain operational compliance with the requirements of the Curacao Gaming Authority (CGA), YouGMedia B.V. implements a range of mandatory Responsible Gaming measures. These measures form the core of the company's Responsible Gaming framework and are designed to protect players, promote responsible gambling behaviour, and reduce the risk of gambling-related harm.

The following Responsible Gaming elements are mandatory for compliance with the CGA gaming license:

1. **Age Verification** – Procedures to ensure that all players are at least 18 years of age before participating in any gaming activities.
2. **Information Accessibility** – Clear and accessible information regarding responsible gambling, player protection tools, and available support resources.
3. **Player Self-Assessments** – Tools that allow players to evaluate their own gambling behaviour and identify potential risk indicators.
4. **Behaviour Tracking** – Monitoring systems designed to detect patterns that may indicate problematic gambling behaviour.
5. **Cooling-Off Periods** – Short-term voluntary breaks that allow players to temporarily suspend their gambling activity.
6. **Self-Exclusion** – Long-term voluntary exclusion options that enable players to block themselves from accessing gaming services.
7. **Deposit Limits** – Tools allowing players to set limits on the amount of money they can deposit within a specified period.
8. **Consumer Advertising and Marketing Controls** – Responsible advertising practices that prevent targeting vulnerable individuals and ensure transparent promotional communication.
9. **Employee Training** – Training programs designed to ensure that staff members understand Responsible Gaming principles and can identify and appropriately respond to signs of gambling harm.

To ensure the effective implementation of this policy, YouGMedia B.V. will appoint a designated individual responsible for overseeing Responsible Gaming within the organization. Until a dedicated Responsible Gaming officer is formally appointed, the Compliance Officer (separate from the AML/CFT function) will be responsible for implementing, monitoring, and enforcing the Responsible Gaming Policy.

The person responsible for Responsible Gaming must prepare and submit a report to the company's management team at least once every twelve (12) months evaluating the effectiveness of the Responsible Gaming policy and related operational procedures. This report will include recommendations for any necessary operational improvements or policy enhancements.

Any material changes to the Responsible Gaming Policy must be formally communicated to the Curacao Gaming Authority (CGA) in accordance with regulatory requirements.

4. Implementation Schedule

YouGMedia B.V. has established a clear implementation plan for Responsible Gaming measures to ensure compliance with the Curacao Gaming Authority (CGA). The schedule below outlines key actions, associated policy sections, and target completion dates.

Measure	Section	End Apr-26	End May-26	End Sep-26	End Mar-26	End Sep-26
Marketing & advertising cannot knowingly and deliberately target vulnerable persons	12	X				
Terms & Conditions should be visible and clear	6.3		X			
Responsible gambling policy: The document must be submitted to the CGA	2		X			
Management team to be aware of RG policy and its implementation	2		X			
Designate suitably qualified Responsible Gaming tasks to a person within the operator's online business	2		X			
Information Accessibility: Prominent display of information regarding responsible gambling and gambling addiction in English, as well as the language of the target market, including information on the website that gambling is prohibited for minors (under 18 years old)	6		X			
Gambling support referral: A prominent display of gambling treatment options in the target market, including local and/or international problem gambling support websites	6		X			
Marketing & promotions (other than vulnerable persons)	12			X		
Age verification: prohibition of gambling by self-excluded individuals and minors on the website	5.1 5.2			X		
Self-exclusion option must be functional and meet all requirements (offering at least 1-year Self-exclusion period to players)	9.2			X		
No credit offering for wagering	2.1			X		

RG message on all advertising (mandatory)	12			X		
Behaviour tracking and procedures for player identification and interventions must be functional	8				X	
Safer gambling tools. Deposit limits	10.1				X	
RG training of staff with customer interaction (i.e. Customer support and VIP at a minimum and marketing)	11				X	
Cooling-off option must be available to players	9.1				X	
Player self-assessments must be available to players	7				X	
Exclusion by the operator must be functional	9.2					X
Other RG tools as necessary based on risk profile: for example, Reality Check, time limit.	13					X

5 Prevention of underage gambling

5.1 Age verification

In accordance with Article 1.4(d) of the National Ordinance on Games of Chance (LOK), it is strictly prohibited for any gambling licence holder to allow a minor (any person under 18 years of age) to participate in games of chance. YouGMedia B.V. has implemented rigorous age verification procedures to ensure that all participants are of legal gambling age.

5.2 Account Registration

During account registration, players must verify their age through the following process:

1. Self-Attestation: The player enters their date of birth and confirms they are at least 18 years old by selecting a designated checkbox.
2. Additional Verification Checks: Further checks are performed to obtain sufficient certainty that the individual is not a minor.

If, at any point, the operator becomes aware that a player is a minor, the account must be immediately closed. The civil law implications of account closure, including the potential refund of deposits and forfeiture of winnings, must be considered, and the operator must clearly communicate the reason for closure to the player.

5.3 Proof of Age Documentation

All age verification processes are subject to the CGA's Know Your Customer (KYC) and Anti-Money Laundering (AML) policies. At a minimum, verification must include a government-issued valid ID, such as a passport, national ID card, or driver's license, particularly prior to the first withdrawal or upon reaching specified thresholds.

Secondary verification methods, which may be used at the operator's discretion, include:

- Electronic verification systems
- Payment method validation
- Third-party or government database checks
- Selfie verification

These secondary methods do not replace the requirement for a government-issued ID.

5.4 Record-Keeping

YouGMedia B.V. maintains records of all age verification checks and their outcomes. These records are available for review by regulatory authorities to ensure compliance with all legal and regulatory requirements.

6 Player Information and Accessibility

6.1 Responsible Gaming Section

YouGMedia B.V. ensures that a dedicated Responsible Gaming Section (RG Section) is available and accessible to all players at all times. The RG Section is a central hub for information, tools, and support related to responsible gambling, designed to empower players to make informed decisions about their gaming activity.

The RG Section must:

Be clearly identifiable and easily accessible from the website or app, including a prominent link on the homepage.

Provide clear and understandable information so that players can make informed choices regarding their gambling behaviour. Include direct access to all relevant Responsible Gaming tools, such as self-exclusion, cooling-off periods, deposit and loss limit settings, and any other measures designed to help players manage their gaming responsibly.

Display clear instructions on how to contact the operator for any Responsible Gaming concerns, including email and live chat options.

Be available in English and the primary language(s) of the target market, with the English version taking precedence in cases of discrepancy.

This approach ensures that Responsible Gaming information and tools are always visible, user-friendly, and actionable, in line with regulatory expectations from the Curacao Gaming Authority (CGA) and the requirements of the National Ordinance on Games of Chance (LOK).

6.2 Homepage Accessibility

YouGMedia B.V. ensures that the Responsible Gaming Section (RG Section) is always clearly accessible from the homepage of its website and mobile application.

Key requirements:

- A prominent and easily identifiable link to the RG Section must be displayed on the homepage.
- The homepage must clearly provide information on how players can contact the operator regarding any Responsible Gaming concerns, including options to reach customer support via email or live chat.
- This ensures that players can immediately locate responsible gambling resources and communicate with the operator if they require assistance, in line with CGA regulatory expectations.

6.3 Terms & Conditions Inclusion

YouGMedia B.V. ensures that the Responsible Gaming Section (RG Section) is explicitly referenced and included within the website's Terms & Conditions.

Key requirements:

- The RG Section must be clearly referenced in the Terms & Conditions to ensure players are aware of its existence and purpose.
- The Terms & Conditions must be accessible within one click from the homepage, allowing players to review them easily.
- Players must be fully informed about the Responsible Gaming tools available, including their functionality and instructions on how to use them effectively to manage their gaming activity.
- This approach ensures transparency and easy access to Responsible Gaming resources, in compliance with CGA regulations and best practices for player protection.

6.4 Footer Information Requirements

YouGMedia B.V. ensures that the footer of its website and mobile application homepage includes all essential Responsible Gaming and regulatory information, providing players with clear and immediate access to important resources.

The footer contains:

- A clear visual indication that underage gambling is prohibited.
- The name and registered address of YouGMedia B.V., as the licensed operator.
- The official license number issued by the Curacao Gaming Authority (CGA).
- A statement confirming regulatory oversight of the operator's activities by the CGA.
- A direct link to the Responsible Gaming Section (RG Section).
- The operator's CGA digital seal.

- A direct link to one or more gambling addiction support resources, such as GamCare, Gamblers Anonymous, or GambleAware. Where applicable, local support resources in the player's target market may also be provided.

This ensures that players can quickly access regulatory information, Responsible Gaming tools, and support services, in line with CGA expectations and best practices for player protection.

7 Self-Assessment

YouGMedia B.V. ensures that players have the ability to review their betting and wagering history and assess their gambling behaviour, empowering them to make informed decisions and maintain healthy gaming habits.

7.1 Access to Account History

Players must be able to access a detailed record of all bets and wagers, including timestamps, for at least the last six months. This is without prejudice to longer retention periods required by other applicable laws and regulations.

- Players may request access to longer periods of transaction history, which must be provided within 10 working days.
- If the operator demonstrates that this timeframe is not reasonably achievable, the CGA may grant an appropriate extension.

7.2 Self-Assessment Tools

Players should be encouraged to regularly evaluate their gambling habits using self-assessment tools designed to identify potential problem gambling behaviors.

YouGMedia B.V. provides access to:

- Gamblers Anonymous 20-Question Quiz (available at <https://gamblersanonymous.org/20-questions/>)
- Scientifically recognized screening tools, such as the CAGE Questionnaire adapted for gambling

The **CAGE Questionnaire** prompts players to answer honestly:

1. **C – Cut Down:** Have you ever felt you should cut down on your gambling?
2. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
3. **G – Guilty:** Have you ever felt guilty about your gambling?
4. **E – Eye-Opener:** Have you ever had a morning “eye-opener” to steady your nerves or recover from gambling losses?

7.3 Interpreting Results

- **0 Yes Answers: Low risk for gambling problems**
- **1 Yes Answer: Moderate risk;** further assessment may be needed
- **2 or More Yes Answers: High risk;** further evaluation and intervention are strongly recommended

7.4 Guidance for Players

Players who identify problematic gambling behaviours through self-assessment are encouraged to explore all available Responsible Gaming tools, such as deposit limits, cooling-off periods, and self-exclusion options, to help manage their gambling responsibly.

8 Behavior Tracking

YouGMedia B.V. actively monitors player activity to identify signs of problematic gambling and implements clear intervention strategies for high-risk players to mitigate harm and support responsible gaming.

In accordance with Article 1.4(e) of the National Ordinance on Games of Chance (LOK), the operator must not allow any individual who can reasonably be assumed to be a Vulnerable Person to participate in games of chance.

8.1 Holistic Player Analysis

By analyzing the player's overall relationship with the operator, YouGMedia B.V. can:

- Identify at-risk individuals.
- Take proactive measures to prevent gambling-related harm.

It is recognized that any single indicator alone does not automatically classify a player as a potential gambling addict. Typically, multiple indicators occurring simultaneously and consistently are required to determine problematic gambling behaviour.

8.2 Frontline Staff Monitoring

Behavior tracking is primarily undertaken by frontline staff, including customer service representatives and VIP managers, who are well-positioned to:

- Detect patterns of potentially problematic behaviour.
- Identify at-risk players through direct interactions.
- Flag accounts for more detailed analysis using a structured process, which must be included in the Responsible Gaming policy.

8.3 Technological Tools

In addition to staff monitoring, YouGMedia B.V. may use technological tools approved by the CGA, including:

- Gaming platform features
- In-game monitoring tools
- Artificial Intelligence (AI) or Machine Learning (ML) systems to detect high-risk behaviors.

These combined measures provide a comprehensive, proactive approach to identifying and protecting at-risk

players while maintaining compliance with CGA requirements.

8.4 Key Monitoring Factors

YouGMedia B.V. monitors player activity to detect patterns indicative of potential problem gambling. The following key factors are considered when identifying at-risk players:

- Deposit and wagering frequency: Sudden or unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions: Due to insufficient funds.
- Reversing withdrawals: Players canceling withdrawal requests multiple times.
- Extended play sessions: Patterns of unusually long or inexplicable gaming sessions.
- Increased communication with customer support: Including frequent bonus requests or signs of agitation.
- Frequent changes to Responsible Gaming tools: Continuously setting or changing deposit/loss limits or repeatedly using the cooling-off feature.
- Maxing out credit cards: Repeated attempts to gamble using full credit capacity.
- Multiple account creation attempts: Players attempting to bypass deposit or loss limits by creating additional accounts.

These factors, when occurring consistently or simultaneously, may indicate a player is at risk and trigger further analysis or intervention.

8.5 Procedures for Player Identification and Intervention

YouGMedia B.V. maintains a structured and documented process to respond to indicators of problem gambling, ensuring both proactive protection of players and compliance with CGA requirements.

8.5.1 Player Profiling and Risk Assessment

- Player profiles are established and maintained, incorporating relevant data to assess individual risk levels.
- A risk-based approach determines the level of monitoring and intervention required.
- All Responsible Gaming interactions, whether initiated by the player or YouGMedia B.V., must be recorded in the Player Account Management (PAM) system, including indicators of concern and actions taken.

8.5.2 Responsible Gaming Interventions

Players identified as exhibiting at-risk behaviour are informed of the available Responsible Gaming tools, including deposit limits, cooling-off periods, and self-exclusion options.

YouGMedia B.V. follows a clear escalation protocol, which may include:

- Applying mandatory deposit limits to the player's account.

- Temporarily suspending the account pending further assessment.
- Permanently excluding the player in cases of severe or persistent risk.

Important: Responsible Gaming measures must never be used to delay or prevent legitimate player withdrawals. Any misuse of interventions for financial gain will be considered a breach of CGA licence conditions.

9. Cooling-Off and Self-Exclusion

YouGMedia B.V. provides effective tools and processes to empower players to manage their gambling behavior. Two key Responsible Gaming mechanisms are made available at all times via the RG Section of the website or app:

- Cooling-Off: A short-term, temporary restriction from gambling activities, customizable by the player.
- Self-Exclusion: A long-term, irrevocable exclusion from all gambling activities under YouGMedia B.V.'s license.

Players must not be guided or influenced toward either option. No bonuses, promotions, or reassurances may be provided to encourage continued gambling. Players must be clearly informed of the differences between these options and can proceed directly to self-exclusion if they identify as vulnerable.

	Cooling Off	Self-Exclusion
Wagering Prohibited	Player selection – all or by vertical.	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or All operator brands – as selected	All brands/domains under the operator's license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None
Antepost bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing messages	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. Operator should have a plan to fully automate this process in

		short term.
Reactivation	Automatic	Player initiated

9.1 Cooling-Off

9.1.1 Overview

Players can activate a cooling-off period, temporarily restricting their gambling activity. Players may customize restrictions according to:

1. **Duration** (mandatory)
2. **Brand** (optional)
3. **Vertical** (optional)
4. **Marketing Opt-Out** (mandatory)

Players select their preferences via tick-boxes, which **must not be pre-checked**.

9.1.2 Duration Options

- 24 hours
- 7 days
- 1 month
- 3 months

9.1.3 Vertical Options

- All gambling activity
- Restriction on individual product verticals (e.g., Casino, Fixed Odds Betting, Poker, P2P). Casino may be sub-categorized as All Games or Slots Only.

9.1.4 Brand Options

- Current brand (website and/or app)
- All brands operated by **YouGMedia B.V.**

9.1.5 Marketing

- Players can opt-out of marketing during the cooling-off period.

9.1.6 Actions and Implementation

Timing:

- Restrictions take effect **immediately** according to player selections.
- Operators **must not**:
 - Question the player's decision
 - Offer bonuses or promotions
 - Delay or complicate the activation process

- Optional verification checks for periods of 1 or 3 months may be provided online, neutrally phrased:

"You wish to cool off for one month. Please confirm."

Player Account:

- Funds remain accessible for withdrawal.
- Account remains active but gambling features are disabled.

Marketing and Communications:

- Marketing materials must not be sent if the player opts out.
- No bonuses, free play, or incentives may be offered during the period.

9.1.7 Reactivation and Post-Cooling-Off Protocol

- Accounts are automatically reactivated after the selected period.
- No further action is required by the player.

9.2 Self-Exclusion

9.2.1 Overview

YouGMedia B.V. offers all players the option to self-exclude from all gambling activity under the operator's license.

Key elements of the self-exclusion process:

1. Duration: In accordance with Article 5.4(2) of the LOK, players may select a long-term self-exclusion period of at least 1 year.
2. Brand: Self-exclusion applies to all brands and domains operated under the license.
3. Vertical: Applies to all gambling activity.
4. Marketing: Players are automatically opted out of all marketing communications.

Players select the duration via tick-box; all other elements are automatic.

The self-exclusion process must be fully online, allowing players to initiate and complete the process without operator approval or email communication.

9.2.2 Duration Options

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime

9.2.3 Actions and Implementation

9.2.3.1 Timing

- Restrictions take effect immediately upon confirmation by the player.
- Any wagers placed after the self-exclusion request and prior to activation must be voided, and funds returned to the player.

Operators **must not**:

- Question the player's decision
- Offer bonuses or promotions
- Delay or complicate activation

Optional verification:

- A simple online check may be used to confirm the player's understanding of the consequences.

Example neutral wording:

"You have chosen to self-exclude for 5 years. Please confirm."

Player Account Management

- Account is closed; the player cannot log in.
- Robust measures must be in place to detect and prevent duplicate accounts for self-excluded players.
- Ante-post bets must be voided and refunded, in line with AML/CFT regulations.
- Players must complete any in-progress tournaments (e.g., poker) at the time of self-exclusion.
- Contributions to progressive jackpots remain valid for prior gameplay, but the player cannot participate further during the exclusion period.

9.2.3.2 Marketing and Communications

- No direct marketing or advertising may be sent to self-excluded players.

9.2.4 Reactivation and Post-Exclusion Protocol

- After the self-exclusion period, the player must request in writing (via email or chat) to unblock the account.
- Requests may be initiated at login or through voluntary communication via official support channels.
- Reactivation cannot be instigated by the operator.
- Activation of self-exclusion is irreversible for the selected duration.
- Records of self-excluded players must be retained in accordance with applicable retention periods.
- Where possible, any payment methods used by the player must be blocked during the exclusion period to prevent circumvention.

9.3 Operator-Initiated Exclusion

The operator may exclude a player as a high-risk intervention if:

- The player displays problematic gambling behavior.
- The player engages in criminal activity via the operator's platform.

Operators cannot exclude players solely based on the amount of their winnings.

All operator-initiated exclusions must be formally documented, with records retained for at least five years.

The CGA may request these records at any time.

10 Limits

The operator must provide players with tools to control their gambling activity by setting deposit limits.

Players may set limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

10.1 Deposit Limits

- Players can limit the total amount deposited over a chosen period (daily, weekly, or monthly).
- Once a deposit limit is reached, the player cannot deposit additional funds until the period resets.
- If players request changes to an existing limit:
 - Increasing restriction: takes effect immediately.
 - Decreasing restriction: subject to a 24-hour waiting period before implementation.
- Any wagers placed prior to setting the deposit limit are not affected.

Exceptions to Limits and Exclusions

Limits may affect active wagering situations, including:

- Ongoing poker tournaments
- Unresolved ante-post bets on future events

In such cases:

- Restrictions are enforced immediately except for active gameplay or unresolved wagers.
- Upon completion of the activity or event, the limit fully applies, and no further wagering is permitted during the active gameplay or pending bets.

11 Training and Staff Readiness

Operators must ensure that customer service and Responsible Gaming staff are trained to manage player interactions professionally and effectively.

Training must include:

- Recognizing signs of gambling distress (e.g., agitation, aggression, financial desperation).
- Conducting sensitive and structured conversations with at-risk players.
- Directing players to appropriate Responsible Gaming tools and support resources.

12 Consumer Advertising and Marketing

Operators must ensure all advertising and marketing is responsible.

Key principles include:

- No targeting of vulnerable groups – marketing must not deliberately target vulnerable persons.
- No portrayal of gambling as an investment – gambling must not be presented as a method for financial gain or problem-solving.
- No misrepresentation of skill vs. chance – marketing must not suggest that skill can influence outcomes of chance-based games.
- No emotional manipulation – gambling must not be portrayed as a substitute for emotional, financial, or mental well-being.
- No inclusion of minors – marketing must not feature or depict minors gambling.
- No explicit content – advertisements must not include overt sexual or pornographic imagery.
- No encouragement of unrelated harmful behaviours – gambling must not be linked to smoking, alcohol, drug use, or sexual attractiveness.

Bonus Conditions

- Promotions must have clear and transparent terms and conditions.
- Bonuses must not encourage excessive gambling.

Third-Party Involvement

- Operators are responsible for materials provided to affiliates, representatives, ambassadors, or influencers, including both wording and visuals if it constitutes paid placement or advertisement.
- All third parties must be made aware of and adhere to the operator's Responsible Gaming policy.

Responsible Gaming Messaging

- All advertising must include a clearly visible Responsible Gaming message or slogan.

13 Enhanced Responsible Gambling Measures

Operators may implement enhanced Responsible Gambling (RG) measures in response to higher levels of risk in their business model. Higher risk may arise due to:

- An inherently high-risk business model (see paragraph 2.2), or
- A disproportionately high number of players being assessed as at-risk, either through operator-led checks or a large number of self-exclusions or cooling-off requests.

13.1 Internet Filtering Tools

To further prevent underage gambling:

- The operator must remind adult players to safeguard usernames, passwords, and payment details when sharing devices with minors.
- The operator may provide links to third-party software that restricts access to gambling websites.

Examples include:

- **BetBlocker** – betblocker.org
- **GamBlock** – gamblock.com
- **Gamban** – gamban.com

13.2 Direct Player Interaction

- Operators may use automatic or manual pop-up notifications in response to concerning behaviours. Notifications must include a link for the player to contact a trained Responsible Gaming professional.
- When a player exhibits behaviour that reasonably indicates they may be a vulnerable player, the operator must initiate direct contact, advising the player to:
 - Review the Responsible Gaming section, and
 - Consider using the available tools and support services.

13.3 Other Limits

Depending on the operator's target market and player base, additional limits may be applied, such as:

- Loss limits
- Time limits
- Wager limits

13.4 Reality Check

Operators may implement Reality Check measures to help players manage their gambling activity without compromising the user experience. These measures must be fit-for-purpose and may include:

1. Real-time session timer visible while the player is logged in.
2. Real-time clock in the player's local time zone.
3. Periodic pop-up reminders about session duration.
4. Player-activated reality checks, allowing players to set custom alerts at specific intervals.

Implementation of Customized Reality Checks

- Reality check alerts must temporarily suspend gameplay, requiring the player to confirm they have read the message before resuming.
- Messages may include:
 - Duration of the current session
 - Player's winnings and losses during the session
 - Option to end the session or continue playing

These measures are designed to empower players to make informed and controlled gambling decisions while mitigating potential harm.



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