

Responsible Gambling Policy for Weplay Network

For ALL Registered players and Operators on Network

AML Policy Version: Last updated on April 20, 2024

1. Introduction

1.1. Company Overview:

WP Consulting N.V. operates [WePlay Network](#), with its office located at Zuikertuintjeweg Z/N, Willemstad, Curacao, under registration number 156492.

1.2. Responsible Gambling Policy Objectives:

Objective is to establish a framework that prioritizes **player safety**, **regulatory compliance**, and **ethical operations** while minimizing gambling-related harm.

1. Definitions

- **Games of Chance:** Games where outcomes depend on chance (e.g., slots, sports betting, poker).
- **Vulnerable Person:** Minors (<18), individuals with gambling addiction, bankrupt persons, or self-excluded players.
- **Self-Exclusion:** Voluntary player-initiated ban from gambling activities across all Weplay domains.
- **LOK:** Curacao's National Ordinance on Games of Chance.

2. Policy Overview

Weplay Network, operated by WP Consulting N.V. (CGA License **OGI/2024/113/0114**), is committed to promoting safe, responsible gambling. This policy aligns with Curacao Gaming Authority (CGA) regulations and ensures player protection through proactive tools, staff training, and ethical practices.

3. Mandatory Requirements

Weplay Network implements the following **CGA-mandated measures**:

- **Age Verification:** Rigorous ID checks pre-registration.
- **Self-Assessment Tools:** Access to Gamblers Anonymous/CAGE questionnaires.
- **Behavior Tracking:** algorithmic monitoring of deposits, sessions, and patterns.
- **Cooling-Off/Self-Exclusion:** Immediate activation via player accounts.
- **Deposit Limits:** Configurable daily/weekly/monthly restrictions.
- **Staff Training:** Quarterly workshops for customer support and compliance teams.

4. Player Protection Measures

4.1 Age Verification

- **Pre-Registration:**
 - Government-issued ID (passport, driver's license).
 - Automated third-party checks (e.g., SumSub) for real-time validation.
- **Underage Detection:**
 - Immediate account closure, refund of deposits, and forfeiture of winnings.
 - Parental control resources linked in footers.

4.2 Self-Assessment & Education

- **Tools:**
 - In-platform access to [Gamblers Anonymous 20 Questions](#) and CAGE questionnaire.
 - Pop-up reminders during extended sessions.
- **Support Resources:**
 - 24/7 links to GamCare, Gamblers Anonymous, and local helplines.

4.3 Behavior Monitoring

- **Key Triggers:**
 - Erratic deposit spikes, frequent withdrawal reversals, or prolonged sessions (>2 hours).
 - Alerts to Customer Support for personalized intervention.
- **Intervention Protocol:**
 1. **Risk Assessment:** Player profiling by Compliance Officer.
 2. **Direct Contact:** Trained staff offer cooling-off/self-exclusion options.
 3. **Escalation:** Suspend accounts displaying extreme risk.

5. Cooling-Off & Self-Exclusion

5.1 Cooling-Off Periods

- **Options:** 24h, 7d, 1m, 3m.
- **Activation:** One-click via account settings; immediate suspension of play.
- **Marketing Opt-Out:** Players may exclude themselves from promotions during cooling-off.

5.2 Self-Exclusion

- **Periods:** 1y, 3y, 5y, 10y, or lifetime.
- **Process:**
 - Irreversible activation within 15 minutes.
 - Full account freeze, refunds per AML rules, and removal from marketing lists.
- **Reactivation:**
 - Post-exclusion, players must submit a written request and complete a 24h cooling-off period.

6. Financial Safeguards

6.1 Deposit Limits

- **Customization:** Players set daily/weekly/monthly limits via dashboard.
- **Adjustments:**
 - Stricter limits apply immediately.
 - Limit increases require a **7-day waiting period**.

6.2 Reality Checks

- **Session Alerts:**
 - Timers visible on-screen; customizable reminders (e.g., every 30 mins).
 - Summary of wins/losses and duration upon alert.

7. Marketing & Advertising Compliance

7.1 Prohibited Practices

- No targeting of minors, self-excluded players, or vulnerable groups.
- Avoid imagery linking gambling to financial success, emotional relief, or sexual content.

7.2 Affiliate & Influencer Guidelines

- **Contracts:** Binding agreements requiring compliance with CGA standards.
- **Audits:** Quarterly reviews of affiliate content for responsible messaging.
- **Social Media:** Age-gated ads; influencers must disclose partnerships.

7.3 Bonus Transparency

- Clear terms for wagering requirements; no aggressive promotion.

8. Staff Training & Governance

8.1 Responsible Gaming Officer (RGO)

- **Role:** Compliance Officer oversees policy implementation, annual reporting to CGA.
- **Duties:** Escalate high-risk cases, audit behavior logs, and update tools.

8.2 Training Programs

- **Topics:** Identifying problem gambling, de-escalation techniques, AML protocols.
- **Frequency:** Quarterly workshops for frontline staff.

9. Compliance & Reporting

9.1 Record-Keeping

- **Duration:** 7 years for self-exclusion logs, age verification, and interventions.
- **CGA Audits:** Submit records within 5 business days upon request.

9.2 Incident Response

- **Breach Protocol:**
 - Report underage/self-excluded player access to CGA within 5 days.
 - Block accounts and refund deposits immediately.

10. Policy Accessibility

- **Languages:** Available in English and other primary target markets.
- **Website Placement:**
 - Homepage link to full policy.
 - Footer includes CGA license ID, support resources, and contact (support@we-play.poker).

9. Policy Review and Updates

Annual Review: This policy must be reviewed annually or whenever there is a significant change in Regulatory Framework.

Staff Training: Regular training sessions on Responsible Gambling management will be conducted for employees handling product infrastructure and product management.

WP Consulting N.V.

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