

BETS ENTERTAINMENT N.V.

RESPONSIBLE GAMING POLICY

Version History:

Date	Version	Summary Changes	Approved by: Glenn C. Rellum, o.b.o Downtown E-Commerce Company B.V.
March 31, 2025	1.0	Policy implementation	

TABLE OF CONTENTS

DEFINITIONS.....	4
WHAT IS RESPONSIBLE GAMING?	4
POLICY SCOPE.....	4
POLICY OBJECTIVES	4
AGE VERIFICATION	5
DEPOSIT LIMITS	5
REALITY CHECKS, PLAY HISTORY, AND REPORTS	5
INFORMATION AND SUPPORT	5
RESPONSIBLE GAMING INFORMATION	5
SUPPORT RESOURCES	5
SELF-ASSESSMENT TOOLS.....	6
STAFF TRAINING AND AWARENESS	6
MONITORING AND INTERVENTION.....	6
PROCEDURES FOR PLAYER IDENTIFICATION AND INTERVENTION	6
MONITORING FOR PROBLEM GAMING	6
COOLING-OFF PERIODS.....	7
SELF-EXCLUSION	7
SELF-EXCLUSION PROCESS AND REQUIREMENTS:.....	7
FINANCIAL AND ACCOUNT MANAGEMENT	7
PREVENTING ACCESS BY SELF-EXCLUDED OR ADDICTED INDIVIDUALS	8
MARKETING AND ADVERTISING COMPLIANCE.....	8
ADVERTISING AND MARKETING GUIDELINES.....	8
DUE DILIGENCE FOR HIGH-RISK AFFILIATES.....	8
RISK MANAGEMENT MEASURES	8
RISK ASSESSMENT FOR TIME-LIMITED PROMOTIONS.....	9
RISK EVALUATION OF MARKETING CAMPAIGNS.....	9
COMPLIANCE AND REGULATORY OBLIGATIONS	9
CONTACT INFORMATION.....	9

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.
- **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:
 - Under eighteen years of age.
 - 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.
 - Has been banned from playing any Game of Chance either by force or at his or her own request.
 - Has been declared bankrupt.

WHAT IS RESPONSIBLE GAMING?

At Bets Entertainment N.V. we recognize the importance of responsible gaming and are dedicated to providing a safe and enjoyable online gaming environment. This Responsible Gaming Policy (hereinafter the "Policy") outlines our commitment to promoting Responsible Gaming practices, protecting players, and ensuring compliance with the regulations set forth by the CGA in Curaçao. The most important tool against the negative side effects of gaming is knowledge and education about the risks of gaming, supporting our users' self-control to ensure they do not suffer negative side effects.

POLICY SCOPE

This Policy applies to all employees and partners involved in our gaming operations and outlines the guidelines and measures we implement to promote responsible gaming. It is essential that all staff understand and adhere to this policy to support our players effectively.

POLICY OBJECTIVES

- **Foster a Safe Gaming Environment:** Ensure that all gaming activities are conducted in a fair and responsible manner.
- **Support Player Protection:** Implement measures to protect vulnerable individuals and promote Responsible Gaming .
- **Compliance with Regulatory Standards:** Adhere to all requirements set by the Curacao Gaming Authority and continuously improve our practices.

AGE VERIFICATION

We enforce a strict minimum age requirement of 18 years to participate in our gaming services. Players must confirm they are of legal gambling age through multiple verification methods, including:

- Date of birth confirmation;
- An "I am over 18" tick box during registration;
- Confirmation of payment method;
Valid government-issued identification (passport, national ID, driver's license).

If a player is found to be underage, access will be denied, and any funds deposited will be returned in accordance with our policies. We maintain comprehensive records of all age verification attempts and their outcomes.

DEPOSIT LIMITS

Players can set daily, weekly, or monthly deposit limits to control their spending. These limits can be set during account registration or modified at any time in the account settings.

Players will be notified of their current deposit limits and receive a notification when they reach 80% of their limit to encourage responsible gaming.

Requests to reduce deposit limits take effect immediately, while requests to increase limits are subject to a mandatory 7-day waiting period.

REALITY CHECKS, PLAY HISTORY, AND REPORTS

We encourage players to utilize reality check reminders, which notify them of their playtime at regular intervals (e.g., every hour).

- Players can customize these reminders in their account settings.
- Players can access a detailed play history, including information on their betting activity, deposits, and withdrawals, promoting informed decision-making.

INFORMATION AND SUPPORT

RESPONSIBLE GAMING INFORMATION

Our website includes a dedicated section on responsible gaming, providing educational resources on gambling risks, signs of problem gambling, and tips for safe gambling practices. Information on the odds of various games is also provided to promote informed decision-making.

SUPPORT RESOURCES

We offer links to professional organizations and hotlines specializing in gambling addiction, such as [BeGambleAware](#), [GamCare](#), [Responsible Gambling Council](#).

A dedicated support team is available to assist players experiencing gambling-related issues, and we encourage players to reach out for help if they feel they are losing control.

SELF-ASSESSMENT TOOLS

Players are encouraged to take self-assessments to determine their gambling behavior. We provide links to recognized self-assessment tools, such as Gamblers Anonymous: <https://www.begambleaware.org/gambling-problems/do-i-have-a-gambling-problem/>.

STAFF TRAINING AND AWARENESS

All employees, particularly those in customer support and compliance roles, will undergo comprehensive training programs focusing on responsible gaming practices. This training will cover:

- Recognizing signs of gambling distress
- Conducting sensitive and structured conversations with at-risk players
- Directing players to appropriate support resources
- Documenting interactions for compliance and follow-up actions

Ongoing education on the latest developments in responsible gaming practices and regulations will be provided to ensure our policies remain effective and up-to-date.

MONITORING AND INTERVENTION

We actively monitor player behavior to detect signs of problematic gambling. By analyzing deposit activity, betting patterns, session durations, and player interactions, we can identify at-risk individuals and take proactive steps to prevent gambling-related harm.

PROCEDURES FOR PLAYER IDENTIFICATION AND INTERVENTION

1. Player Profiling and Risk Assessment: Establish player profiles with relevant data points to assess individual risk levels.
2. Direct Player Interaction: When concerning behavior is identified, the Company must initiate direct contact with the player via trained responsible gaming professionals.
3. Responsible Gaming Interventions: Players exhibiting at-risk behavior must be informed about responsible gaming tools, including deposit limits, time-outs, and self-exclusion.

MONITORING FOR PROBLEM GAMING

We utilize behavioral tracking to flag signs of problematic gambling, such as:

- Rapid, repeated deposits
- Long play sessions
- Chasing losses

When such patterns are detected, alerts are triggered for our Responsible Gaming team, who will offer appropriate interventions, including messages, deposit limits, or account reviews.

COOLING-OFF PERIODS

Players can activate a cooling-off period of 24 hours, 7 days, 1 month, or 3 months, during which they are temporarily restricted from gambling. This option is easily accessible and can be activated with a single click, without requiring email communication or company approval.

Upon activation of the cooling-off option:

- The player will be informed of the difference between a cooling-off period and self-exclusion.
- The cooling-off period takes effect immediately.
- The player's account will be locked, preventing any participation in gambling activities for the selected period.
- The player will be given the option to enhance their protection by opting out of the marketing database during their cooling-off period.

The company will not discourage players from activating the cooling-off period by questioning their decision, offering reassurances, or providing bonuses or promotions as incentives to continue playing.

SELF-EXCLUSION

We implement a clearly defined and documented self-exclusion program that is easily accessible and ensures immediate action upon a player's request. This tool is designed to help individuals regain control over their gambling behavior and prevent further harm.

Players have the option to self-exclude from gaming activities for specified periods, including 1 year, 3 years, 5 years, 10 years, or a lifetime.

Once a self-exclusion request is submitted, the player's account will be suspended, and they will not receive any promotional materials or communications during the exclusion period.

All known payment methods used by self-excluded players will be blocked for future use.

SELF-EXCLUSION PROCESS AND REQUIREMENTS:

The self-exclusion option is prominently displayed on the website, ensuring players can easily locate and activate it. Information about self-exclusion clearly outlines the steps required, duration options available, and the benefits of self-exclusion.

Players can initiate and complete the self-exclusion process fully online, without requiring email communication or Company approval. The process is designed to take no more than 15 minutes to complete.

We will maintain a Self-Exclusion Register for a minimum of seven years from the end of a player's exclusion period, including records of all self-excluded players and their known payment methods to prevent future use during the exclusion period.

FINANCIAL AND ACCOUNT MANAGEMENT

Upon activation of total self-exclusion from all verticals:

- All gambling-related transactions are blocked immediately.
- The player's account is deactivated, preventing further play.
- Remaining funds in the player's account must be refunded to the original payment method within two business days, subject to AML policy requirements.
- The Company must permanently remove the player's data from all marketing and promotional lists.

PREVENTING ACCESS BY SELF-EXCLUDED OR ADDICTED INDIVIDUALS

To prevent self-excluded or addicted individuals from accessing our services, we implement the following measures:

- **Verification Against Self-Exclusion Lists:** All new registrations are checked against local and internal self-exclusion lists to ensure compliance.
- **Account Blocking:** Access to accounts under cooling-off or exclusion periods is blocked to prevent further participation in gaming activities.
- **Data Sharing:** We share relevant data with regulators or national programs when required to enhance player protection.

MARKETING AND ADVERTISING COMPLIANCE

Bets Entertainment N.V. is responsible for ensuring that all marketing, promotional, and advertising activities adhere to responsible gaming principles. Direct marketing activities (including emails, messaging, bonuses, or incentives) are prohibited during an active cooling-off or self-exclusion period.

ADVERTISING AND MARKETING GUIDELINES

All advertising must include a clearly visible responsible gaming message or slogan. The company shall not engage in misleading, excessive, or irresponsible advertising, adhering to the following restrictions:

- No aggressive or misleading tactics.
- No targeting of vulnerable groups, self-excluded players, minors, or financially vulnerable individuals.
- No portrayal of gambling as an investment or solution to financial difficulties.
- No misrepresentation of skill versus chance.
- No emotional manipulation or portrayal of gambling as a means of escaping personal struggles.
- No use of child-friendly content or imagery appealing to minors.

DUE DILIGENCE FOR HIGH-RISK AFFILIATES

We conduct thorough due diligence for high-risk affiliates, which includes:

- KYC (Know Your Customer) checks on affiliate owners.
- Assessment of the affiliate's jurisdiction, reputation, and business model.
- Screening for links to fraud, money laundering, or unethical practices.

RISK MANAGEMENT MEASURES

- We utilize an affiliate risk scoring system to evaluate potential risks associated with affiliates.
- We review traffic sources and marketing methods for compliance and ethical standards.
- Contracts with affiliates include clauses on Anti-Money Laundering (AML) and Responsible Gaming .
- Continuous monitoring of player quality, including metrics such as high chargebacks and bonus abuse, is conducted.

RISK ASSESSMENT FOR TIME-LIMITED PROMOTIONS

When designing promotional campaigns, we assess for high-risk features, including urgency and high-stakes incentives. Specific measures include:

- Setting deposit and betting limits for promotional activities.
- Displaying risk warnings and options for cooling-off during promotions.
- Monitoring player behavior for impulsive patterns, such as rapid bets or chasing losses.
- Allowing players to self-exclude or opt-out during promotional periods.

RISK EVALUATION OF MARKETING CAMPAIGNS

We review all marketing campaigns to ensure compliance with Responsible Gaming standards:

- Background checks on influencers and assessment of audience demographics.
- Compliance with age restrictions and advertising standards.
- Assessment of content to prevent aggressive or misleading messaging.

Campaigns must be approved by management and include Responsible Gaming messages. We monitor for spikes in high-risk sign-ups and ban promotions targeting vulnerable groups.

COMPLIANCE AND REGULATORY OBLIGATIONS

We document all responsible gaming activities and maintain records for regulatory review. The Curacao Gaming Authority may request these records at any time to ensure compliance.

If a self-excluded individual or minor is found to have accessed gambling beyond their self-exclusion choices:

- All deposited amounts must be refunded within two business days.
- The player's account will be immediately blocked to prevent further play.
- A detailed report will be submitted to the CGA within five working days, outlining how the issue occurred and what actions are being taken to prevent recurrence.

CONTACT INFORMATION

For any inquiries related to our Responsible Gaming Policy or if you need assistance, please contact our support team at support@bets.io. Our Support will ensure that any information shared is kept confidential and will not be disclosed without Your consent.