

Curacao - Safer Gambling Policy

Introduction

This policy outlines the responsibilities of Bet Pegasus B.V. staff in promoting safer gambling practices in compliance with Curacao's gambling regulations, specifically the "Landsverordening op de Kansspelen" (LOK).

Regulatory Framework

This policy is developed in accordance with the Curacao Gaming Control Board's regulations and the LOK. It ensures that all staff adhere to legal requirements and promote responsible gambling.

Staff Responsibilities

- **Age Verification:** Staff must rigorously verify the age of customers to prevent underage gambling, as mandated by Article 7 of the LOK.
- **Self-Exclusion Management:** Assist customers in self-exclusion processes and ensure these requests are promptly and accurately processed.
- **Deposit Limit Guidance:** Educate customers on setting deposit limits and assist them in configuring these limits as per Article 12 of the LOK.
- **Reality Checks:** Ensure customers receive regular reminders about their gambling activity and provide guidance on responsible gambling practices.
- **Cooling off Periods:** Temporary restrictions on gambling activities, 24 hours, 7 days, 1 month or 3 months durations, with exclusion from marketing and all gambling verticals.

Employee Training

- All staff will undergo comprehensive training on responsible gambling practices, including identifying signs of problem gambling and understanding the procedures for assisting customers, in line with Article 15 of the LOK.
- Training will include the use of tools and resources to support customers effectively.

Support and Intervention

- **Identifying Problem Gambling:** Staff must be vigilant in identifying signs of problem gambling, such as:
 - Behavioural changes (e.g., increased irritability or secrecy)
 - Financial issues (e.g., frequent requests for credit)
 - Excessive time spent gambling
 - Chasing losses
 - Neglecting responsibilities
 - Emotional distress (e.g., stress, anxiety, or depression)
- **Providing Resources:** Offer information on support services and helplines for problem gambling, as required by Section 10 of the Responsible Gaming Guidelines.

Monitoring and Intervention

Staff are responsible for monitoring gambling activities and reporting any suspicious or concerning behaviour to management.

Key Monitoring Factors:

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- A pattern of Inexplicable extended play sessions.
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period.
- Players maxing out a credit card.
- Attempts to open multiple accounts to bypass deposit or loss limits.
- Any breaches of this policy must be reported to the Curacao Gaming Control Board, following the guidelines set in Article 20 of the LOK.

Operators must have a structured and documented process for responding to identified indicators of problem gambling, including but not limited to:

- Establish and maintain player profiles incorporating relevant data points to assess risk levels

- A risk-based approach to be adopted to determine appropriate levels of monitoring and intervention
- All interactions must be recorded, along with the indicators of concern and any action taken.

Interventions taken must be proportionate to the risk displayed, interventions can include but are not limited to:

- Players identified as exhibiting at-risk behaviour must be informed of the Responsible Gaming tools available, such as deposit limits, cooling off, and self-exclusion options.
- Operators must follow a clear escalation protocol where appropriate, 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.
- Under no circumstances may an operator use Responsible Gaming measures as a pretext to prevent or delay legitimate player withdrawals. Any misuse of protective interventions for financial gain will be considered a breach of licence conditions.

Safer Gambling Tools

- **Cooling off Periods:** Temporary restrictions on gambling activities, 24 hours, 7 days, 1 month or 3 months durations, with exclusion from marketing and all gambling verticals. This must apply immediately.
- **Self Exclusion:** Long-term exclusions, at a minimum of 1 year, and available for 3, 5, 10 years and Lifetime. Exclusion must take effect immediately alongside marketing restrictions. Operators must not question the decision, offer bonuses/promotions or delay the activation process.
- **Deposit Limit:** Players can set limits on the total amount they deposit over a defined period daily, weekly, or monthly. If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.
- **Reality Check:** Reality check measures are varied, and if used the operator can implement these measures without compromising the user experience. However, if used they must be fit-for-purpose and measures include, but are not limited to:

1. A real-time session timer that remains visible at all times while the player is logged in.
2. A real-time clock in the players time zone.
3. Periodic pop-up reminders or prompts about session duration.
4. Player-Activated Reality Checks.

Players have the option to set customized reality check alerts at specific time intervals. When triggered, it requires the player to confirm that they have read the message before resuming play and offers the option to end the session or continue playing

Information Accessibility

- Responsible Gambling Pages
 - The Responsible Gambling Page must be clearly identifiable and accessible, containing easily understandable information allowing players to make informed choices.
 - Page must include direct access to all relevant tools, including but not limited to cooling off period, self-exclusion and other measures.
 - How to contact the operator for any SG-related support (Email/Chat)
 - Must be made available in English and the language of target markets.
- Home Page Accessibility
 - Clear Like to relevant SG page should be made available on homepage, as well as the accessibility to contact the operator regarding RG concerns.
- Terms and Conditions
 - Must be one click away from the homepage, and include a specific dedicated RG section.
 - Within the terms, players must be informed about the responsible gambling tools available and how they can be used.
- Footer information
 - Clear visual indication of underage gambling being prohibited.
 - A dedicated link to the RG Section
 - A Direct link to one or more gambling addiction support resources, in addition to internal support resources/information and links to local support sites of target markets.

Compliance and Accountability

Staff must adhere to all procedures outlined in this policy and maintain transparency in all interactions with customers.

Regular audits and reviews will be conducted to ensure compliance with the policy and relevant regulations.

Version Control

The current status of this document is: **IN PROGRESS**

Owned by - @Joaquin Paton Compliance Key Person

Version Number	Version/Amendments	Updated By	Approved By	Date
V0.1	Initial draft	@Zac Barrett	Edward Hamilton	Apr 22, 2026