
Gleneagles B.V. – Responsible Gaming Policy

Company Name: Gleneagles B.V.

Registration Number: 158256

Registered Address: Willemstad, Curaçao

Licensing Jurisdiction: Curaçao (under LOK framework)

Effective Date: 12 November 2025

1. Purpose and Commitment

Gleneagles B.V. is committed to promoting responsible gaming and ensuring that all gaming activities conducted under its Curaçao license are fair, transparent, and socially responsible. The company recognises its duty to safeguard players from the potential negative effects of gambling and to prevent underage or vulnerable persons from participating.

2. Objectives

The primary objectives of this Responsible Gaming Policy are to:

- Prevent underage gambling.
 - Promote informed and responsible decision-making.
 - Identify and assist players who may be at risk of developing gambling-related problems.
 - Ensure compliance with Curaçao's *National Ordinance on Games of Chance (LOK)* and related AML/CFT regulations.
 - Promote ethical conduct and transparency among employees and affiliates.
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3. Prevention of Underage Gambling

- Players must be at least **18 years old** (or older if required by their jurisdiction).
 - Verification of age and identity is mandatory prior to activation of any player account.
 - Gleneagles B.V. uses automated KYC procedures and document verification to ensure compliance.
 - Accounts suspected of underage access are immediately suspended pending investigation.
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4. Fair and Responsible Play

- All games are provided by licensed software suppliers and undergo regular RNG (Random Number Generator) testing by accredited laboratories.
 - Clear terms and conditions are available to players outlining rules, payout structures, and house advantages.
 - Marketing materials never imply guaranteed winnings or misrepresent the nature of gambling.
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5. Player Protection and Self-Exclusion

- Players may **self-exclude** voluntarily for a defined or indefinite period.
 - Self-exclusion requests are honoured immediately and recorded securely in Gleneagles B.V.'s player protection database.
 - Cooling-off periods are available for players wishing to take a short-term break.
 - Customer Support staff are trained to identify signs of problem gambling and provide information on counselling services and helplines.
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6. Deposit and Loss Limits

- Players can set personal **deposit, wager, and loss limits** within their account settings.
 - Limits can only be decreased immediately, while increases require a 24-hour reflection period.
 - Automated systems monitor unusual betting behaviour and trigger alerts for review by compliance staff.
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7. Problem Gambling Awareness

- The company provides educational materials explaining responsible gambling practices, including:
 - The randomness of results.
 - The risks of chasing losses.
 - Tools for maintaining control over gambling activities.
 - Links to professional support organisations (e.g. GamCare, Gambling Therapy) are displayed prominently on the website.
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8. Staff Training

- All staff receive mandatory Responsible Gaming and AML awareness training annually.

- Compliance personnel are trained to identify and manage responsible gaming concerns sensitively and confidentially.
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9. Advertising and Marketing Ethics

- Gleneagles B.V. adheres to ethical marketing standards:
 - No targeting of minors or vulnerable persons.
 - No false claims of guaranteed wins or financial success.
 - Clear disclosure of bonus terms and wagering requirements.
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10. Monitoring and Review

- The Responsible Gaming Policy is reviewed annually or when regulatory updates occur.
 - Compliance audits are performed periodically to ensure adherence to Curaçao LOK standards and best practices.
 - The company designates a **Responsible Gaming Officer**, reporting directly to the Board of Directors and the Compliance Officer.
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