

Responsible Gaming Policy

BAMLA LIMITED N.V

July 2025

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1	Initial Draft	Compliance Officer	28/07/2025

Control Statement

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Recipients:

- Board of Directors
- Compliance Officer
- Responsible Gaming Officer* to be appointed
- Internal Auditor
- Compliance/AML Team
- Customer Support Team
- Accounting Team

Relevant Legislation and references:

- National Ordinance for Games of Chance (LOK) of the 20th of December 2024.
- Responsible Gaming Policy for Licensed Operators, Version 1.0 of the 17th of April 2025 of the Curacao Gaming Authority.

Definitions

Account	A registered player profile on the Company's gaming platform, used to access gaming services through the official and licensed gaming website of the Company, hold balances, and conduct transactions.
AML/CFT	Anti-Money Laundering and Countering the Financing of Terrorism.
Compliance Officer	The designated senior executive at management level responsible for overseeing a Company's compliance with Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) laws and regulations. Appointed under Section V.3 of the Regulation of the CGA for combating AML/CTF of January 2025, the CO serves as the Company's central point of contact for handling reported suspicions of money laundering or terrorist financing from employees and partners. Their duties include developing, implementing, and maintaining the Company's Internal Policies and Procedures related to AML/CFT, ensuring their effective application across the organization, and continuously monitoring compliance to mitigate financial crime risks.
Business Day	Any day other than a public holiday or weekend in Curaçao.
BoD	The Board of Directors of the Company.
Company	Means Bamla Limited N.V

Customer	- Any person or entity that maintains an account with the Company. - Any person or entity on whose behalf an account is maintained by the Company. - Beneficiaries of transactions who maintain an account with the Company.
CGA	The Curacao Gaming Control Board or the “Regulator”.
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.
Financial Transactions	Means deposits and withdrawals through the Account (bonusses are not included). Amounts wagered and winnings are considered as gambling transactions. Gambling transactions are not considered as financial transactions.
Policy	This Responsible Gaming Policy.
ML/TF	Money Laundering and Terrorist Financing
Fraudulent Activity	Any act or omission carried out with the intent to deceive, defraud, or gain an unfair advantage. This includes, but is not limited to, account takeovers, the use of automated tools or bots, bonus abuse, or submission of falsified identification documents.
Gaming Services	Sports betting, esports-betting, fantasy sports, lottery and bingo, online casino games, skill-based games and virtual sports, as well as related ancillary services necessary for the operation of gaming accounts, including balance maintenance, transaction processing, customer verification, and account management.
Games of Chance	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.
Remote Games of Chance	A Game of Chance provided remotely by means of electronic communication devices and played without physical contact with the party providing the game.
Gaming License	A license for organizing or providing the opportunity to play a Game of Chance.
LOK	The National Ordinance on Games of Chance Law of Curacao.
Marketing, promotion and advertising.	All resources, messages and media that promote the Company’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	The basic elements of a Responsible Gaming policy that must be implemented by all operators including the Company. These elements must reflect the target markets and players of the Company.
Minor	Means any person under the age of 18.
Player	Means Customer.
Responsible Gaming Complaint	Any issue raised by a player concerns the enforcement or effectiveness of responsible gambling measures, such as the availability and timely implementation of self-exclusion or cooling-off periods, or any alleged failure to protect vulnerable individuals as outlined in the company’s Responsible Gaming Policy.
Self-exclusion	An event where a player voluntarily bars themselves from all or certain online gaming-related activities with the Company.
Vulnerable Person	Means a person who: i. Is under eighteen years of age;

	ii. Has no, or insufficient control over his or her gambling behavior, 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; iii. Has been declared bankrupt, or has otherwise lost the control or disposal of all or part of his/her property; iv. Has been banned from playing any Game of Chance either by force or at his/her own request.
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1. Company Information

Bamla Limited N.V. is a company registered in Curaçao under registration number **164689**, with its principal office located at **Abraaham de Veerstraat 1, Curacao**. The Company operates as an online casino and holds license number **OGL/2024/1258/0552**, issued by the Curaçao Gaming Control Board (CGA). The Company is duly authorized and regulated by the CGA to offer business-to-consumer (B2C) remote gaming services, including games of chance and sports betting.

The Company conducts its business operations from its headquarters in Curaçao and maintains full compliance with the licensing requirements and regulatory conditions imposed by the CGA. In accordance with such conditions, the Company is prohibited from offering its services to users located in restricted jurisdictions, including but not limited to the United States, Australia, Curaçao, France, Germany, Austria, Spain, Iran, Iraq, the United Kingdom, and the Netherlands.

The Company strictly adheres to these territorial restrictions and does not target, promote, solicit, or provide services to individuals in jurisdictions where online gambling is prohibited.

2. Purpose and Scope

The Company is committed to promoting a secure, fair, and socially responsible gaming environment. In line with the applicable obligations under the **National Ordinance on Games of Chance (LOK)** and the requirements of the **Curaçao Gaming Authority (CGA)**, the Company upholds responsible gaming standards designed to protect players, prevent gambling-related harm, and maintain gaming as a safe and enjoyable form of entertainment.

To ensure compliance with regulatory expectations and industry best practices, the Company has embedded responsible gaming principles across its operations. This includes:

- Integrating responsible gaming safeguards throughout the Company's platform to encourage ethical player behavior.
- Maintaining a formal Responsible Gaming Policy that is subject to periodic review and approval by management.
- Ensuring transparency and accessibility by publishing the Policy on the CGA Licensee Portal for regulatory review and making it easily available to players via the Company's website.
- Using data-driven insights to assess and refine player protection measures.

This Policy sets out the guiding principles, regulatory obligations, and governance framework supporting the Company's responsible gaming program. It outlines the key preventative tools, intervention mechanisms, and internal responsibilities that ensure consistent implementation across all licensed domains. Through this Policy, the Company reaffirms its commitment to safeguarding players, particularly vulnerable persons, in accordance with the standards established by the CGA.

3. Mandatory Player Protection Standards

The Company adopts a structured and proactive approach to Responsible Gaming, implementing comprehensive safeguards designed to protect players and mitigate gambling-related harm.

Required Responsible Gaming Protocols

The following core protocols are embedded into the Company's operations in accordance with the LOK and CGA guidelines:

- **Age Verification:** Ensuring that all players are of legal age through robust identity verification procedures.
- **Transparent Responsible Gaming Information:** Providing clear and visible responsible gaming information across all platforms to enable informed decision-making.
- **Self-Assessment Tools:** Offering tools to help players evaluate their gambling behavior and identify early signs of risk.
- **Behavioral Monitoring Mechanisms:** Utilizing technology to detect patterns of excessive gambling or risk-indicative behavior.
- **Cooling-Off and Self-Exclusion Options:** Allowing players to suspend or permanently close their accounts to manage gambling behavior.
- **Deposit Limits:** Enabling players to set personal financial controls over their gaming expenditure.
- **Staff Training and Awareness:** Educating employees, affiliates, and marketing partners on responsible gaming principles and obligations.
- **Ethical Marketing Practices:** Ensuring that all promotional activities comply with responsible gaming standards, including restrictions against targeting minors, self-excluded individuals, or financially vulnerable persons.

Responsible Gaming Oversight and Internal Governance

To maintain accountability and ensure continued compliance, the Company designates a **Responsible Gaming Officer (RGO)**. Until formally appointed, the duties of the RGO will be temporarily assumed by the Compliance Officer (excluding AML/CFT responsibilities). The RGO shall be responsible for:

- Conducting an annual review of the Responsible Gaming Policy to assess effectiveness and identify improvements;
- Submitting detailed internal reports to the Board of Directors outlining key observations and recommendations;
- Coordinating updates to policies and regulatory filings in line with CGA requirements;
- Ensuring that semi-annual reporting to the CGA is completed as mandated.

Player Protection Measures

The Company enforces a series of structured safeguards to create a secure and well-regulated gaming environment, including:

- **Formal Responsible Gaming Programs:** Establishing documented guidelines that promote safe and ethical gaming conduct.
- **Educational and Awareness Campaigns:** Providing players with educational content, self-assessment quizzes, and guidance on responsible play.

- **Real-Time Behavioral Monitoring:** Implementing analytics and alerts to flag unusual or potentially harmful gambling behavior.
- **Regulatory Reporting and Audits:** Ensuring full transparency and adherence to licensing conditions, including periodic internal reviews and regulatory audits.

Through these initiatives, the Company reaffirms its commitment to responsible gaming, player safety, and compliance with the standards set by the Curaçao Gaming Authority under the LOK.

4. Responsible Gaming Officer (RGO)

The Company designates a **Responsible Gaming Officer (RGO)** to oversee the implementation and ongoing monitoring of responsible gaming practices in line with the **Curaçao Gaming Authority's Responsible Gaming Policy (April 2025)**.

4.1. Appointment and Interim Responsibility

- The RGO shall be appointed by the Board of Directors and shall operate independently from commercial and operational teams.
- Until formally appointed, the responsibilities of the RGO shall be assumed by the **Compliance Officer**, excluding their duties related to AML/CFT.

4.2. Responsibilities of the RGO

The RGO is responsible for:

- Ensuring effective implementation of the Responsible Gaming Policy across all business units and gaming platforms;
- Conducting an **annual review** of the Policy and issuing recommendations to management;
- Submitting periodic reports on responsible gaming metrics, incidents, and outcomes to the **Board of Directors**;
- Overseeing the self-exclusion and player protection systems, including incident response and follow-up actions;
- Coordinating **staff training** on responsible gaming awareness and intervention protocols;
- Acting as a point of contact for the Curaçao Gaming Authority in relation to responsible gaming matters.

5. Information Access

The Company ensures that responsible gaming information, tools, and support services are readily accessible across its digital platforms. In alignment with the Curaçao Gaming Authority's Responsible Gaming Policy (April 2025), the following standards are implemented:

5.1. Website Integration and Policy Visibility

- The Responsible Gaming Policy is clearly displayed and accessible from the Company's homepage, with a dedicated section linked in both the header and footer.

- The Policy is published in **English** and, where applicable, in the **official language of the relevant target market**, to ensure broad accessibility and comprehension.

5.2. Access to Player Protection Tools

The Company provides direct access to the following Responsible Gaming tools:

- **Self-Exclusion Mechanisms:** Players may exclude themselves from gambling activities for a defined period.
- **Cooling-Off Periods:** Temporary suspensions are available for players seeking short-term breaks from gaming.
- **Deposit Limits:** Players may impose financial limits on their accounts to manage spending behavior.
- **Contact Channels:** Support services are available via email and live chat for players seeking assistance with responsible gaming concerns.

5.3. Integration with Terms and Conditions

To reinforce awareness, responsible gaming rights and tools are explicitly referenced within the Company's **Terms and Conditions**, which:

- Are accessible via a one-click link from the homepage;
- Include clear reference to available player protection measures and the Responsible Gaming Policy.

5.4. Footer Content and Compliance Statements

The Company ensures that the footer of its website includes the following compliance and responsible gaming disclosures:

- A clear statement prohibiting underage gambling ("18+ Only");
- The Company's legal name and registered address;
- The CGA-issued license number;
- A statement confirming regulatory supervision by the Curaçao Gaming Authority;
- A direct link to the Responsible Gaming Policy;
- The CGA's official digital seal.

5.5. External Support and Player Assistance

The Company provides direct links to trusted third-party gambling addiction organizations and professional support networks. These resources are made visible and easily accessible within the Responsible Gaming section, ensuring that players who may be at risk can obtain external help when needed.

Through these measures, the Company affirms its commitment to player protection, ethical gaming practices, and regulatory compliance, ensuring that Responsible Gaming remains a cornerstone of its operational integrity.

6. Protecting Underage Gambling Through Age Verification

The Company is committed to preventing underage gambling and strictly enforces age verification measures.

All users must confirm that they are at least **18 years of age** before registering an account, depositing funds, or engaging in any gambling activity. Any account found to be associated with an individual under 18 will be subject to immediate suspension and, where confirmed, permanent closure.

6.1. Age Verification Protocols

The Company applies a multi-layered approach to age verification, which includes:

- **Declaration of Legal Age:** All players must confirm they are 18+ during the registration process.
- **Document-Based Identity Verification:** Upon triggering AML/CFT or KYC thresholds, players are required to submit valid identification documents (e.g., passport, national ID, or driver's license).
- **Payment Method Validation:** In some cases, the Company may verify the ownership of a payment method as an additional layer of verification.
- **Enhanced Scrutiny:** Where age-related concerns arise, the Company may implement additional checks such as:
 - Proof of address (e.g., utility bill or bank statement);
 - Selfie verification with ID in hand;
 - Third-party database cross-checks.

6.2. Actions Taken Against Underage Accounts

If an account is suspected of belonging to a minor, access is suspended pending investigation. Where underage gambling is confirmed:

- The account is **permanently closed**;
- Any deposited funds are **refunded**, unless restricted due to AML/CFT compliance;
- All winnings are **voided**;
- A **written notification** is issued to the individual explaining the reason for closure.

6.3. Record-Keeping and Regulatory Oversight

The Company maintains detailed logs of all age verification attempts, including enhanced checks, for audit purposes. These records are made available upon request to the CGA or any other competent authority.

6.4. Parental Controls and Prevention Measures

To further protect minors from exposure to gambling content, the Company encourages parents and guardians to adopt the following preventative steps:

- Securing devices, credentials, and payment instruments used for online access;
- Implementing **parental control software**, such as:

- [Net Nanny](#)
- [GamBlock](#)
- [CyberSitter](#)

The Company affirms its commitment to regulatory compliance and player protection by implementing robust age verification systems and promoting responsible parental oversight.

7. Temporary measures for ongoing player restrictions

The Company provides accessible and transparent options for players to restrict their gambling activity in accordance with their personal circumstances and in full alignment with the **Responsible Gaming Policy of the Curaçao Gaming Authority (April 2025)**.

7.1. Cooling-Off Periods

Players may voluntarily activate a temporary account restriction for any of the following durations:

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

Upon activation, the following measures are implemented immediately:

- The account is temporarily locked and access to all gambling services is suspended.
- Players are offered the option to disable marketing communications during the restriction period.
- An informational message clarifies the difference between cooling-off and self-exclusion, and invites players to select a longer restriction if appropriate.

Policy Safeguards:

- No incentives, delays, or persuasive messaging may interfere with a player's decision to activate a cooling-off period.
- If system enhancements are pending, cooling-off requests may be processed manually until full automation is achieved.

7.2. Self-Exclusion

The Company offers a robust and clearly presented self-exclusion feature, allowing players to voluntarily exclude themselves from gambling activities across all services and platforms. Available durations include:

- 1 year
- 3 years
- 5 years

- 10 years
- Lifetime exclusion

Process and Effects:

- Self-exclusion is fully automated and takes immediate effect.
- Upon activation, the account is locked; all deposits, wagers, and withdrawals are blocked.
- All known payment methods are disabled to prevent circumvention.
- Player data is removed from all marketing systems.
- Player information is added to the internal Self-Exclusion Register and retained for at least 7 years post-exclusion.

Prohibited Practices:

- The Company strictly prohibits delaying, discouraging, or incentivizing players to abandon a self-exclusion request.

Account Reactivation:

- Self-exclusion cannot be reversed before the selected duration expires.
- After expiration, players must submit a written request to reactivate their account.
- A responsible gaming advisory message and self-assessment tool are provided as part of the reactivation process.
- Accounts are only reactivated under the original credentials to prevent duplicate registrations.

Partial Self-Exclusion

Players may opt to restrict access to specific gaming verticals while retaining access to others. In such cases, restrictions apply only to the selected categories.

Financial and Account Handling During Self-Exclusion

- All gambling-related transactions are blocked immediately.
- For full exclusions, account deactivation is applied and any remaining funds are refunded within two (2) business days, subject to applicable AML/CFT restrictions.

Operator-Initiated Exclusions

The Company reserves the right to initiate exclusion measures in cases where a player exhibits high-risk behavior, addiction indicators, or financial distress, or engages in fraudulent activity.

- All operator-initiated exclusions are documented and retained for a minimum of five (5) years.
- The Curaçao Gaming Authority may request these records at any time for audit or compliance review.

Regulatory Reporting

- All self-exclusion and operator interventions are logged in real time.
- If a self-excluded or underage individual is found to be gambling, their account will be suspended immediately.
- Deposited funds (subject to AML/CFT checks) will be refunded within two (2) business days.
- A formal incident report will be submitted to the CGA within five (5) business days.

8. Playtime Monitoring and Reality Checks

The Company maintains proactive measures to promote player awareness of gaming activity and encourage informed decision-making.

8.1. Session Duration Tracking

A **persistent session timer** is continuously displayed while players are logged into their accounts. This visual indicator enables players to monitor the duration of their active gaming sessions in real time and assess whether a break or time-out is appropriate.

8.2. Reality Check Notifications

The Company provides **periodic Reality Check pop-up notifications** to remind players of the time spent gambling and their current session status. These alerts are designed to interrupt continuous play, prompt reflection, and reinforce responsible gaming behaviors.

Depending on platform capabilities, the Reality Check functionality may include:

- Notification of elapsed playtime at fixed intervals (e.g., every 30 minutes);
- A summary of session time, wagered amounts, and account balance;
- Action options such as logging out, continuing, or setting a cooling-off period.

8.3. Player Empowerment and Responsible Play

These tools support the Company's commitment to player well-being by enhancing self-awareness and promoting moderation. The Company ensures that Reality Check alerts cannot be disabled or bypassed and that all interactions with these tools are logged for compliance purposes.

9. Responsible Gaming Controls - Deposit Limits

The Company enables players to maintain control over their financial engagement with gambling services by offering customizable deposit limit tools. These mechanisms support responsible gaming, and mitigate the risk of excessive gambling.

9.1. Personalized Deposit Limits

Players may set **daily, weekly, or monthly deposit limits** to manage their gambling budgets. The Company ensures that:

- Once a deposit limit is reached, no further deposits can be made until the designated time period resets;

- Requests to apply stricter deposit limits take **immediate effect**;
- Requests to **increase** an existing limit are subject to a **mandatory seven (7) day cooling-off period**, designed to promote well-considered financial decisions.

9.2. Limit Exceptions for Active Play

In specific situations, certain gameplay elements may be allowed to conclude before the deposit limit restriction takes full effect. These include:

- Players actively participating in multi-stage tournaments (e.g., poker) at the time a limit is triggered;
- Unresolved ante-post or future event wagers, which remain valid until settlement.

The Company ensures that such exceptions are strictly controlled and do not undermine the player protection objectives of this Policy.

9.3. Commitment to Ethical Gaming

Through the implementation of flexible deposit limit controls and related safeguards, the Company empowers players to exercise financial control and aligns its operational conduct with best practices in responsible gaming. These measures form part of the Company's broader commitment to regulatory compliance and sustainable player engagement.

10. Responsible Advertising and Promotional Oversight

The Company is committed to ensuring that all advertising, marketing, and promotional activities are conducted in accordance with the **Responsible Gaming Policy of the Curaçao Gaming Authority (April 2025)** and adhere to the principles of fairness, transparency, and player protection.

All marketing initiatives are designed to **avoid encouraging excessive or irresponsible gambling**, and no materials shall be targeted at **minors, self-excluded individuals, or vulnerable persons**. This commitment extends to all Company representatives and business partners, including **affiliates, influencers, and VIP agents**.

10.1. Responsible Advertising Standards

The following standards are enforced across all marketing channels:

- **No deceptive or coercive content** – all advertisements must be truthful, accurate, and non-aggressive.
- **No targeting of vulnerable persons** – marketing must not be directed at minors, self-excluded individuals, or players exhibiting problem gambling behavior.
- **No portrayal of gambling as an income strategy** – advertisements must not suggest that gambling is a viable means of generating wealth or resolving financial hardship.
- **No misrepresentation of chance-based games** – materials must not imply that skill can influence the outcome of random games.
- **No emotional exploitation** – gambling must not be promoted as a solution to emotional, psychological, or social problems.

- **No child-friendly or youth-appealing content** – including cartoon characters, animations, or visuals that appeal to underage audiences.
- **No use of public figures with significant underage followings** – influencers or celebrities with youth audiences must not be used in gaming promotions.
- **No explicit or suggestive content** – advertisements must avoid sexualized imagery or language.
- **No association with high-risk behaviors** – gambling promotions must not be linked to alcohol abuse, drug use, or smoking.

10.2. Bonus and Promotion Transparency

To ensure fairness and regulatory compliance, all bonus offers must:

- Clearly state **terms and conditions** in a manner that is easily understood;
- Avoid encouraging excessive play or suggesting that losses can be recovered through further gambling;
- Provide transparent information on **eligibility, wagering requirements, and payout limitations**.

10.3. Inclusion of Responsible Gaming Messaging

The Company ensures that all advertising includes **responsible gaming disclaimers** and directs players to **support resources**. Additional safeguards include:

- **Age-restricted targeting** on social media platforms;
- Clear labeling of content as gambling-related;
- **Exclusion of self-excluded and limited players** from direct marketing campaigns (email, SMS, push notifications);
- Compliance with all **CGA advertising standards**, including print and digital formats.

10.4. Affiliate and Influencer Marketing Compliance

All affiliates, influencers, and third-party marketers must:

- Sign **legally binding agreements** incorporating responsible marketing guidelines;
- Undergo **periodic compliance audits** conducted by the Company;
- Accept that **sanctions or termination** may apply in cases of non-compliance.

Influencers engaged via social media are further required to:

- Verify that their audience is predominantly adult;
- Avoid any association with minors or youth-driven platforms;
- Refrain from using misleading or provocative content to endorse gambling.

10.5. Sponsorship and Brand Placement

All sponsorship activities are subject to the following restrictions:

- Sponsored materials must not target minors or appear on youth-oriented merchandise;
- Gambling-related branding must not be featured at events aimed at underage audiences;
- All sponsorship content must include a clear responsible gaming message.

10.6. Enforcement and Accountability

The Company monitors all advertising and promotional activities for compliance with this Policy. Violations may result in the withdrawal of materials, regulatory reporting, and termination of third-party relationships.

Through the enforcement of these standards, the Company ensures that its marketing efforts remain ethical, legally compliant, and consistent with the broader goals of responsible gambling.

11. Regulatory Oversight and Reporting

The Company maintains a transparent and accountable responsible gaming framework, which includes formal **reporting to the Curaçao Gaming Authority (CGA)** and retention of regulatory documentation in line with licensing obligations.

11.1. Reporting Requirements

- The Company shall submit a **semi-annual Responsible Gaming Report** to the CGA, detailing:
 - Self-exclusion and cooling-off statistics;
 - Reported incidents or policy breaches;
 - Implementation progress of responsible gaming measures;
 - Any updates to internal controls or tools.
- In the event of a **serious incident**, including unauthorized gambling by a self-excluded or underage player, the Company shall:
 - Block the account immediately;
 - Refund any funds (subject to AML/CFT constraints);
 - Submit a **formal incident report** to the CGA within **five (5) business days**, detailing the breach and remedial actions taken.

11.2. Recordkeeping and Audit Support

- The Company retains all records related to responsible gaming actions, player restrictions, and advertising compliance for a period of at least **seven (7) years**.
- These records shall be made available to the CGA upon request and will be used to demonstrate the Company's ongoing commitment to responsible gambling oversight and regulatory integrity.

12.Periodic Review

This policy shall be reviewed **annually** by the Compliance Officer and updated as necessary to reflect regulatory changes or operational developments. Revisions shall be approved by the Board of Directors.