



Responsible Gambling Policy

For the offering of Online Gambling Under Licence From CGB

POL-CU-RG-01

Current Version

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1. Overview

1.1 Introduction

Bull Gaming BV ("the Company/ Rollbit/ us/ our/ we") has developed and put into effect this Responsible Gambling Policy (hereinafter referred to as the RG Policy) to protect the vulnerable groups of persons and to ensure a safe and enjoyable internet gambling experience.

Recognizing that an effective and robust framework is crucial to prevent excessive participation and gambling addiction, the Company is committed to implementing and regularly reviewing the RG Policy across all aspects of its operations, and making necessary adjustments.

The RG Policy outlines our approach to information provision to our (aspirant-) players, the way we enable them to set limits and other forms of self-regulation, the way we monitor transactions to identify possible excessive participation and the tools we have implemented to limit or exclude players at risk and refer them to professional help organisations.

The AML Policy has received approval from the Company's Managing Director and is aligned with the broader compliance framework governed by the applicable laws and regulations for providing licensed online gambling services in Curacao.

Each major change of Rollbit.com AML policy is subject to approval by the managing director of Bull Gaming N.V.

1.2 Legal Scope

The primary legislation regulating the online gambling industry in Curacao is the National Ordinance on Offshore Games of Hazard (Landsverordening buitengaatsse hazardspelen).

Additional laws and regulations on which this RG Policy is based consist of:

Laws and regulations	Abbreviation
the National Ordinance Identification for Services (Landsverordening identificatie bij dienstverlening, PB 2017, no. 92, GT);	NOIS
the National Ordinance Reporting Unusual Transactions (Landsverordening melding ongebruikelijke transacties, PB 2017, no. 99, GT);	NORUT
the Sanctions National Ordinance (Sanctielandsverordening, PB 2014, no. 55, GT);	SNO

Unless specified, this RG Policy refers to the above legislation as "applicable laws and regulations".

1.3 Definitions and abbreviations

"Gambling interface" the whole of electronic communication with which we offer the licensed games of chance;

"Games of chance by means of distance communication": a game of chance that is organized remotely on the basis of the license;

"Hyperlink" includes an active icon;

"Licensee": the holder of a license granted pursuant to the NOOGH;

"Online Gambling" means any gaming, where any player enters or may enter the game, or takes or may take any step in the game, by means of a telecommunication, the negotiating or receiving of any bet by means of a telecommunication, or any lottery in which any participant acquires or may acquire a chance by means of a telecommunication

"Player": the person who is registered as a player with the licensee;

"Player account": the account held by the licensee in the name of a player with the playing balance of that player, which is used exclusively for the purpose of participating in the licensed games of chance and which can be traced back to the player;

"player interface": the part of the gambling interface accessible to the player after registration;

"Website", means an electronic communication or set of electronic communications which complies with the Hypertext Transfer Protocol and may be accessed and viewed in visible and legible form by any person having ordinary access to the global system of intercommunicating computers known as the Internet.

Definition	Abbreviation
Anti-Money Laundering	AML
Business Risk Assessment	BRA
Customer Due Diligence	CDD
Enhanced Due Diligence	EDD
Responsible Gaming	RG
Suspicious Activity Report	SAR

2. Our Policy

Gambling means entertainment, fun and excitement for the majority of our users. But we also know that for some of our users, gambling has negative side effects. In medical science, pathologic gambling has been recognised for many years as a serious sickness.

Since our first day, we have thought about this problem and try our best to help where we can. Under “Responsible Gambling”, We understand multiple steps of measures, with which a gambling provider can help to reduce the possibility of negative side effects appearing. -In case they already appear, we also try to take active steps against them.

The most important instruments against negative side effects from gambling are knowledge and education about the risks of gambling to support our users’ self-control.

2.1 Information provision

The Company makes information readily available to all its players on how to gamble responsibly and how to access information about, and help in respect of, problem gambling through a dedicated page on its website.

The information covers:

- players’ measure to monitor or control their gambling,
- self-exclusion options,
- further help or advice available.
- Minor Protection

2.2 Registration Journey

Minors

Persons under the age of 18 are strictly prohibited from utilising the Company’s website. Gambling on the website is provided in a way that allows for customers’ identity, and therefore age, to be verified. This is being done via electronic age verification at registration using GetID. The player when creating its account must provide their personal information including their date of birth. In addition, age verification is enacted in the below ways:

- A player signing up on our website must tick a box to confirm they are 18 years or older
- Marketing is tailored not to appeal to underage players.

If the Company is unable to confirm a player’s age through electronic checks, a proof of age documentation will be requested and the account might be suspended.

Multiple accounts

During the registration, the person’s data is being checked against the internal database in order to prevent customers from registering multiple accounts, and thus bypassing the responsible gambling measures.

Self-excluded

Upon registration, a check is also conducted on the personal information provided to establish whether the player has used the self-exclusion option. If this is the case, registration of a player account is refused.

2.2.3 Player limits

The player is offered player limits during registration to control their gambling behaviour:

- a. the maximum amount of time per day, week or month a player must be allowed access to the player interface;
- b. the maximum daily, weekly or monthly amounts of money to be deposited into the player account; and
- c. the maximum daily, weekly or monthly amounts of money to spend through the player account.

2.3 Transaction monitoring**2.3.1 Identifying players at risk**

After the registration and verification stage, the Company has established the customer to be over the legal age limit and provided them with Responsible Gaming tools to determine their spending means prior to depositing money. To effectively protect customers, all customer facing departments are required to conduct proactive and/or reactive checks to identify and protect players from gambling harm.

The detection of these players is managed through:

- Gambling behaviour indicators,
- Customer interaction indicators,
- Relatives / third party's concerns,
- Random checks on active players,
- Internal audit on responsible gaming duty efficiency and application.

2.3.2 Interventions

Based on the profiling performed, graduated interventions will be undertaken by the Company. These interventions might include:

- Information regarding problem gambling risks and the tools proposed by the Company,
- Emails and calls to suggest adapted solutions to the player (setting up limits or using self-exclusion tools) but also to investigate on the player's affordability,
- Limits set up or account suspension/closure in the most severe cases.

In case of need, and for their protection, the Company also advises their players on [Be Gamble Aware](#).

2.4 Limitations and exclusions

2.4.1 Self-assessment

The Company's website links to an online tool, which allows customers to assess their own gambling behaviour:

Self-assessment through [Be Gamble Aware](#).

This self-assessment test is provided by an independent party. It is completely anonymous.

It aims at providing a clearer picture of the player's gambling profile. The assessment is made up of a series of statements, for which the player will be asked to indicate how well he feels. At the end of the assessment, the player will be presented with a summary of which areas of his life may be affected negatively by gambling.

2.4.2 (Self-)Exclusion

Customers are provided with the possibility to exclude themselves from gambling.

Operator level self-exclusion

Registered customers are provided with the option to exclude themselves from gambling on the website for a period of time of the player's choosing (on day, one week, one month, several months or even permanently exclude yourself).

Once the customer decides to self-exclude, access to gambling on the website will be locked until the period has passed. Self-excluded customers are prevented from receiving marketing materials or newsletters during the full length of the self-exclusion period.

Blocking tools

A number of third parties, including [Be Gamble Aware](#), offer software which will allow the player to restrict his access to any website through which he gambles.

2.5 Responsibilities of Employees

All employees engaged in on-line gambling services are expected to actively contribute to RG compliance efforts. Clear roles and responsibilities will be communicated to ensure that each individual understands their obligations.

Customer Due Diligence (CDD)

Employees involved in customer interactions will be responsible for conducting thorough due diligence, verifying customer identities, and monitoring customer activity for any suspicious behaviour.

Reporting of signs of excessive participation

All employees are obligated to promptly report any signs of excessive participation in accordance with established procedures. Reports will be channelled through designated reporting channels.

2.6 Training

To ensure that employees remain informed about evolving RG regulations and best practices in the online gambling sector, the Company provides periodic training sessions.

Content

Training will cover any updates to RG regulations, industry trends, and case studies to reinforce employees' understanding and vigilance.

Feedback and Questions

Employees will be encouraged to provide feedback and seek clarification on any RG-related matters during refresher training session

3. Recording-keeping

The Company will maintain comprehensive records related to customer due diligence, transactional activities, and any other relevant documentation in accordance with the applicable laws and regulations.

Records will be retained for a minimum period of 5 years.

The records will be easily accessible to authorised personnel, including the Compliance officer and relevant regulatory authorities for inspection or audit purposes.