

Responsible Gaming Procedure Green Stream Technology B.V.

Document Control

Version	Date	Description of Changes	Author
1.0	04.02.2026	Initial draft	IGA Trust B.V.

1. Introduction

Green Stream Technology B.V. (referred to as "Green Stream Technology B.V. " or "the Company") provides entertainment services, considering the specifics of gambling and associated risks. One of the main objectives of the company is to follow the principles of responsible gambling. The safety and reliability of the game guide the development of high-quality services and products. Special conditions created by Green Stream Technology B.V. . are designed to promote responsible gambling and mitigate potential negative consequences in case of gambling addiction.

2. Purpose

This guide is designed to give employees a clear, step-by-step process for implementing Responsible Gaming (RG) practices. It ensures player safety, prevents gambling-related harm, and ensures regulatory compliance while making daily tasks easy to follow.

3. Responsible Gaming Overview

- a. No underage gambling: Players under 18 are strictly prohibited.
- b. Monitoring player behavior: Identify risky behaviors early.
- c. Provide self-limiting tools: Deposit limits, cooling-off periods, and self-exclusion options.
- d. Regulatory compliance: CGA reporting and audit-ready records

4. Age Verification (Age Check)

- a. During Registration:
 - Player enters date of birth.
 - Checks box: "I confirm I am over 18 years old."
 - Warning appears: "It is illegal to gamble under 18. Providing false information is considered fraud."
- b. System Risk Flags:
 - Suspicious or invalid birth dates.
 - Emails/payment info linked to previous underage attempts.
 - Country-specific legal age discrepancies.
- c. Document Verification (Mandatory for first withdrawal or high-risk accounts):
 - Acceptable documents: Passport, national ID card, or driver's license.
 - Document must be valid and clear. Screenshots are not accepted.
 - Cross-check info with registration data.
- d. Detected Minor Post-Registration:
 - Close account immediately.
 - Refund deposits.
 - Forfeit any winnings.
- e. Record-Keeping:
 - Maintain verification records for at least 5 years.
 - Provide records to CGA upon request.

5. Accessible Responsible Gaming information

- RG section should be visible on homepage.
- Include tools: Self-exclusion, cooling-off periods, deposit limits.
- Provide support contacts: Email and live chat.

- Languages: English + target market language.
- Footer includes:
- Age restriction warning
- License info and CGA seal
- GambleAware link

6. Player self-assessment tools

- Offer Gamblers Anonymous 20-Question Quiz.
- Risk scoring:
- 0 “Yes” answers = Low risk
- 1 “Yes” answer = Moderate risk
- 2+ “Yes” answers = High risk → Recommend intervention
- Recommendations for at-risk players:
- Set deposit limits
- Cooling-off period
- Self-exclusion

7 Monitoring Gambling Behavior

- Indicators of Risk:
 - Sudden increase in deposits or wagers
 - Frequent failed transactions
 - Multiple withdrawal reversals
 - Long, unexplained gaming sessions
 - Excessive contact with customer support
 - Frequent changes to RG tools
 - Signs of financial stress
 - Attempts to create multiple accounts
- Intervention Procedure:
 - a. Risk-based profiling system flags behaviors.
 - b. Document all concerns in Player Account Management (PAM) system.
 - c. Interventions may include:
 - Promote RG tools
 - Temporary account suspension
 - Permanent exclusion if severe
- Color-coded flowchart suggestion:
 - Green = Low risk, monitor
 - Yellow = Moderate risk, send RG recommendations
 - Red = High risk, intervene immediately

8 Cooling-Off and Self-Exclusion

- Cooling-Off:
 - Durations: 24h, 7 days, 1 month, 3 months

- Account remains active for withdrawals, gambling features disabled
- Ends automatically, no action needed
- Self-Exclusion:
 - Durations: 1, 3, 5, 10 years, or lifetime
 - Account fully closed, cannot gamble or receive marketing
 - Player initiates from their account
 - Period is irrevocable; reactivation requires written request

	Cooling Off	Self-Exclusion
Wagering Prohibited	Player selection – all or by vertical.	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or All operator brands – as selected	All brands/domains under the operator's license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None
Ante post bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing message	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. Operator should have a plan to fully automate this process in short term.
Reactivation	Automatic	Player initiated

9. Deposit limits

- Players can set daily, weekly, monthly limits
- Increasing restriction: takes effect immediately
- Decreasing restriction: 24-hour cooling-off before new limit applies

10. Responsible advertising/marketing

- No targeting vulnerable groups
- No claims that gambling is an investment

- No emotional manipulation, sexual content, or illegal behavior promotion
- All promotions must clearly explain terms
- Third-party affiliates must follow RG policies
- All ads must include RG message or logo

11. Staff training in Responsible Gaming

- Initial Training: All customer-facing and RG staff complete training before starting duties
- Update Training: Required with policy/tool changes
- Training Covers:
 - Identifying problem gambling
 - Handling sensitive interactions
 - Escalation procedures
 - RG tool usage

6. Responsible Gaming Officer / Role

6.1 The Responsible Gaming Officer: Wen Jun Hsieh Contact email at licensing@igagroup.com

6.2 The Responsible Gaming Officer must:

- Submit a Responsible Gaming report at least once every 12 months to management.
- Include policy effectiveness evaluation and recommendations for improvement.
- Report any material policy changes to the CGA.