

Responsible Gaming Procedure DG Innovations B.V.

Document Control

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

1. Introduction

DG Innovations B.V. provides entertainment services with a strong focus on responsible gambling. Recognizing the risks associated with gambling, the Company prioritizes safety, reliability, and quality in the development of its products and services. DG Innovations B.V. has established dedicated measures to promote responsible play and to help prevent or mitigate the negative effects of gambling-related addiction.

2. Purpose

This document outlines the rules and procedures for reporting instances of irresponsible gambling. Its objective is to protect users and promote a safe, responsible, and sustainable gaming environment.

3. Definition of Responsible Gaming

Responsible gaming underpins our commitment to a safe online gaming experience. This includes preventing underage gambling and recognizing players who may be exhibiting a loss of control over their gambling habits, despite adverse consequences or attempts to stop.

4. Measures to Promote Responsible Gambling

To support responsible gambling, DG Innovations B.V. has implemented measures to protect users, including publishing a Responsible Gaming Policy, providing responsible gaming tools and resources, monitoring gambling behavior, complying with regulatory requirements, and prohibiting the use of credit for wagering.

5. Mandatory Responsible Gaming Elements

5.1 Age verification

5.1.1 Participation in any games of chance offered by DG Innovations B.V. is strictly prohibited for individuals under the age of 18 years.

5.1.2 Age Verification Procedures

- **Initial Registration – Self-Attestation.** During account creation, all players are required to:
 - Enter their full date of birth.
 - Confirm they are over 18 years of age by checking a mandatory age declaration checkbox.
 - A warning message is displayed stating: “It is illegal to gamble under the age of 18. If you enter false information, you are committing fraud.”
- **3.2 System-Driven Risk Flags**
 - Use of obviously invalid or suspicious dates of birth.
 - Email addresses or payment details associated with previous underage attempts.
 - Country-specific age of majority discrepancies.

5.1.3 Mandatory Document Verification

- No player shall be permitted to make a first withdrawal or exceed the risk-based verification threshold without submitting a valid proof of age. The following are mandatory:
 - Government-issued photo ID (passport, national ID card, or driver’s license).
 - Screenshots or cropped documents are not accepted.
 - The document must be clear and valid (not expired).
 - Documents are cross-verified against registration data.

5.1.4 Detection of a Minor After Account Creation

- If the operator becomes aware that a minor has gained access, the following actions will be taken immediately:
 - The account will be closed without delay.
 - The operator will refund all deposits made by the player.
 - All winnings will be forfeited in accordance with legal requirements.

5.1.5 Record Keeping and Audits

- All records relating to age verification checks (including documents submitted, verification outcomes, communications, and decisions) are securely stored for a minimum of 5 years.
- These records will be made available to the Curacao Gaming Authority (CGA) upon request.

5.2 Accessible Responsible Gaming information

5.2.1 Responsible Gaming Section

- Information on responsible gambling practices.
- Direct access to tools such as self-exclusion, cooling-off periods, and deposit limits.
- Contact details for Responsible Gaming support [email] and live chat.
- Content in both English and [the language(s) of our target market, please indicate the language].

5.2.2 Homepage Visibility

- A clear and visible link to the RG Section is available on the homepage.

5.2.3 Terms & Conditions

- Reference the RG Section.
- Are accessible within one click from the homepage.
- Inform players of available Responsible Gaming tools and their use.

5.2.4 Footer Requirements

- The website footer displays:
 - A warning that underage gambling is prohibited.
 - The name, address, and CGA license number of the operator.
 - A statement confirming CGA regulatory oversight.
 - The CGA digital seal.
 - Links to [GambleAware](#).

5.3 Player self-assessment tools

5.3.1 Access to Account History

- Longer transaction histories can be requested and will be provided within 10 working days.
- If delays occur due to exceptional circumstances, an extension may be granted by the CGA.

5.3.2 Self-Assessment Tools

- We offer access to [Gamblers Anonymous 20-Question Quiz](#)
- Interpreting the results of:
 - 0 “Yes” answers: Low risk for gambling problems.
 - 1 “Yes” answer: Moderate risk; further assessment may be needed.
 - 2+ “Yes” answers: High risk; further evaluation and intervention are strongly Recommended.

5.3.3 Follow-Up Recommendations

- Players who identify risky behaviors are advised to:
 - Deposit limits
 - Cooling-off periods

- Self-exclusion options]

5.4 Gambling behaviour tracking

5.4.1 Monitoring Indicators

- Our system and staff monitor the following behaviours that may indicate problematic gambling:
 - Sudden increases in deposit or wagering activity
 - Repeated failed transactions due to insufficient funds
 - Frequent reversal of withdrawal requests
 - Extended, unexplained gaming sessions
 - Excessive or agitated contact with customer support
 - Repeated changes to Responsible Gaming tools
 - Maxing out of credit cards or signs of financial stress
 - Attempts to create multiple accounts

5.4.2 Identification & Intervention Procedures

- A risk-based profiling system is used to assess player behaviour.
- All concerns and interactions are logged in the Player Account Management (PAM) system.
- Interventions include:
 - Promoting use of RG tools (e.g., limits, cooling-off, self-exclusion)
 - Imposing temporary limits or suspending the account
 - Permanent exclusion in severe or repeated cases

5.4.3 Compliance Assurance

- Responsible Gaming measures will never be misused to delay withdrawals. Any misuse is a violation of licensing conditions and will result in disciplinary action.

5.5 Cooling-Off and Self-Exclusion

5.5.1 Players must be clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable. The information must be available at all time via the RG Section of the website and app.

	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

5.5.2 Cooling-Off

- Available durations: 24 hours, 7 days, 1 month, or 3 months
- Scope options: Players may select preferences for (Tick-boxes must not be prechecked.):
 - Duration (mandatory)
 - Verticals (Casino, Slots, Sports)
 - Brands (789.club and hit.club)
 - Marketing opt-out (mandatory)
- Implementation:
 - Takes immediate effect—no bonuses or promotional offers will be presented
 - Accounts remain active for withdrawals; all gambling features are disabled
 - Cooling-off ends automatically; no action required by the player
 - If selected, players will not receive marketing during the cooling-off period

5.5.3 Self-Exclusion

- Available durations: 1 year, 3 years, 5 years, 10 years, or lifetime
- Scope options: Players may select preferences for:
 - Duration (mandatory)
 - Applies to all brands, all products
 - Automatic marketing opt-out
 - Players can initiate and complete the self-exclusion process directly from their personal account, without the need for support agent involvement or approval.
- Implementation:
 - Takes immediate effect once confirmed by the player
 - Account is fully closed and inaccessible
 - Operator will block known payment methods and prevent duplicate accounts
 - Any bets placed before the exclusion takes effect must be voided and refunded
 - Progressive jackpot contributions remain in place, but the player forfeits further participation
 - No marketing or contact is allowed during the exclusion period
- Reactivation:
 - Self-exclusion is irrevocable during the selected period
 - After expiry, the player must formally request reactivation in writing via customer support through live chat.

5.5.4 Operator-Initiated Exclusion

- DG Innovations B.V. may enforce a mandatory exclusion if:
 - The player exhibits signs of problematic gambling
 - There is suspicion or evidence of criminal activity
- Such exclusions are never based on a player's winnings.
- All cases are documented and retained for a minimum of five years.

5.6 Deposit limits

5.6.1 Players can set deposit limits for daily, weekly, or monthly periods.

- Once a deposit limit is reached, no additional deposits may be made until the relevant period resets.
- Requests to make a deposit limit more restrictive take effect immediately.
- Requests to make a deposit limit less restrictive (i.e., increase the limit) are subject to a minimum 24-hour cooling-off period before taking effect.
- Any wagers placed, whether settled or unsettled, prior to the deposit limit being set are not affected by the new limit.

5.7 Responsible advertising/marketing

5.7.1 Prohibited Marketing Practices

- Advertising must not target vulnerable groups, portray gambling as an investment or solution to financial, emotional, or mental problems, misrepresent chance-based games as skill-based, include minors, contain explicit or sexual content, or associate gambling with harmful behaviors such as alcohol, drugs, smoking, seduction, or attractiveness.

5.7.2 Bonuses and Promotions

- All bonuses must be presented with clear and transparent terms and conditions and must not encourage excessive or irresponsible gambling.

5.7.3 Third-Party Involvement

- Operators must ensure that all affiliates, ambassadors, influencers, and other third parties promoting the brand are informed of and fully comply with the Responsible Gaming policy.

5.7.4 Responsible Gaming Messaging

- All advertisements must prominently display a Responsible Gaming message or slogan.

5.8 Staff training in Responsible Gaming

5.8.1 Initial Training

- All customer-facing and RG staff must complete RG training before starting duties. New hires must be trained within one month of joining.

5.8.2 Update Training

- Required when new RG tools, policies, or regulatory changes are introduced.

5.8.3 Training Covers

- Identifying gambling-related distress.
- Handling sensitive player interactions.
- Escalation procedures.
- Use of RG tools and support services.

5.8.4 Training Approach

- Online courses (e.g., iGaming Academy, Internal LMS)
- On-site classroom training led by trainers or managers

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:

- A Responsible Gaming report must be submitted to management at least annually, including an evaluation of policy effectiveness, recommendations for improvement, and notification of any material policy changes to the CGA.