

Responsible Gaming Policy

Casiworx N.V.

Version 1.1

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Revision History

Version #	Effective Date	Approving Official	Responsible Office	Next Review Date	Comments
1.0	April 20, 2025	eMoore N.V.	Compliance function	September 17, 2026	-
1.1	September 30, 2025	eMoore N.V.	Compliance function	September 30, 2026	

1. Definitions

CGA - Curacao Gaming Authority.

RG – responsible gaming

Cooling Off - 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.

Self-exclusion - event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator.

Games of Chance - games where outcomes are based solely or predominantly on chance, with limited influence by the player.

LOK - the National Ordinance on Games of Chance law of Curacao.

Marketing, promotion and advertising - Includes all promotional activities via print, media, digital marketing, and social campaigns.

Minor - any person under the age of 18.

CASIWORX – CASIWORX N.V.

Vulnerable Person- defined by LOK as

1. Under eighteen years of age.
2. Lacking control over gambling behavior due to addiction.
3. Banned from playing any Game of Chance either by force or at his or her own request.
4. Declared bankrupt.

2. Introduction

Casiworx N.V. is committed to providing a safe, secure, and responsible online gaming environment. Casiworx N.V. recognizes the duty to protect vulnerable individuals and to uphold the standards outlined by the Curaçao Gaming Authority (CGA). This Responsible Gaming Policy outlines our approach to preventing gambling-related harm and ensuring compliance with the CGA Responsible Gaming Policy for Licensed Operators (v1.0, April 2025). Casiworx has a designated Responsible Gaming Officer.

3. Objectives

CASIWORX Responsible Gaming Policy aims to:

- Prevent gambling by minors and vulnerable persons.

- Promote responsible gaming behavior.
- Provide tools for self-control and harm minimization.
- Identify and assist players exhibiting problematic gambling behaviors.
- Train staff to uphold responsible gaming standards.

4. Player Protection Measures

Casiworx N.V. ensures the integrity and fairness of gaming operations while safeguarding players through the following measures:

- Age Verification: Robust age and identity verification procedures prevent access by individuals under 18.
- Self-Exclusion and Cooling off Options: Players can voluntarily exclude themselves or take temporary breaks.
- Account Controls (Deposit, Loss, Bet, and Session Limits): Tools are available for players to set daily, weekly, or monthly limits on spending.
- Reality Checks and Player History Access
- Marketing Opt-Out Options

5. Age Verification

CASIWORX strictly prohibit underage gambling and implement the following:

- During the registration player is required to enter their date of birth and confirm they are over 18 by selecting a designated checkbox.
- Government-issued valid ID check (such as a passport, national ID, or driver's license) on reaching 2000 EUR thresholds and prior to first withdrawal.
- Ongoing monitoring for signs of underage or unauthorized play.
- Prompt action and immediate account closure if underage gambling is detected.

6. Information Accessibility

6.1. Responsible Gaming Section

CASIWORX provides the RG section:

- Accessible from the account profile.
- Include self-exclusion, cooling-off period, limit settings.
- Display information about how the player may contact CASIWORX via email or chat.

- Available in English.

6.2. Homepage Accessibility

CASIWORX ensures easy access to Responsible Gaming resources directly from the homepage by providing:

- A prominent link to the Responsible Gaming (RG) Section on both the website and mobile app.
- Clear contact options (email and live chat) for players to reach out with any Responsible Gaming-related inquiries or concerns.

6.3. Terms & Conditions Inclusion

CASIWORX provides a comprehensive Responsible Gaming (RG) section that:

- Is clearly referenced and fully integrated within the website's Terms & Conditions.
- Ensures the Terms & Conditions are accessible via a direct link in the footer, no more than one click away from the homepage.
- Includes detailed information on all available RG tools, their functions, and clear instructions on how players can use them effectively.

6.4. Footer Information

The footer of the CASIWORX homepage contains:

- A clear visual indication that under-age gambling is prohibited.
- The name and registered address of the license holder.
- The official license number issued by the Curacao Gaming Authority.
- A statement confirming the regulatory oversight of the Licensee's operations by the Curacao Gaming Authority.
- A link to the RG Section.
- The operators CGA digital seal.
- A direct link to one or more gambling addiction support resource: Gamblers Anonymous (<https://gamblersanonymous.org>).

6.5. Player Self-Assessment

CASIWORX offers players be able to access a detailed record of their betting and wagering history including timestamps of transactions from their player account of at least the last six months. Longer periods of transactions may be requested from the customer support department and must be provided within 10 working days.

CASIWORX recommend that any player who recognize problematic gambling behaviours through selfassessment should explore the available responsible gambling tools.

7. Behavior Tracking

CASIWORX player behavior tracking is undertaken by customer support and payment departments employees.

7.1. Key monitoring factors:

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming - session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- A pattern of Inexplicable extended play sessions.
- Unreasonably increased communication with customer support – including requests for - bonuses reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing - deposit or loss limits or repeatedly making use of cooling-off period.
- Players maxing out a credit card.
- Attempts to open multiple accounts to bypass deposit or loss limits.

7.2. Responsible Gaming Interventions

When the relevant CASIWORX employee identifies player at-risk behaviour, the following measures must be offered:

- Player must be informed of the Responsible Gaming tools available, such as deposit limits, cooling off, and self-exclusion options.
- Consider to Applying mandatory deposit limits to the player's account.
- Temporarily suspending the account pending further assessment.
- Permanently excluding the player in cases of severe or persistent risk.

8. Responsible Gaming Tools

CASIWORX implemented effective processes and tools that empower the player to manage their own gambling behaviour.

8.1. Cooling Off

The option to activate a cooling-off period, during which player are temporarily restricted from gambling activity. The options regard:

- Duration
 - (a) 24 hours
 - (b) 7 days
 - (c) 1 month
 - (d) 3 months
- Marketing Opt-Out (a) Opt-out.

Marketing materials must not be sent to players during their Cooling Off period if they have opted out. The player must select (by tick-box) their preference in each of these categories. Tick-boxes must not be pre-checked.

The restrictions take **effect immediately** and be enforced according to the player's selections. During cooling-off period player funds remain accessible for withdrawal, account remains active, but gambling features are disabled.

8.2. Self-Exclusion

CASIWORX offers players the option to self-exclude from all gambling activity.

1. Duration:
 - (a) 1 year
 - (b) 3 years
 - (c) 5 years (d) 10 years
 - (e) Lifetime.
2. Brand: All brands/domains operated under the operator's license.
3. Vertical: All gambling activity
4. Marketing: Automatic opt-out
5. No direct marketing or advertising can be sent to the player.

Any wagering that takes place following the self-exclusion request and prior to it being into effect will be voided and the funds returned to the Customer.

The Company should not question a Customer's decision regarding self-exclusion in general, nor will the Company offer bonuses to the Customer to encourage participation, or delay/complicate the self-exclusion activation process.

The player must select (by tick-box) their preference as to the duration of the self-exclusion period, all the other elements are automatic.

With regard to the self-exclusion process the player can initiate and complete the self-exclusion process fully online, without requiring email communication or operator approval.

The restrictions **take effect immediately** and be enforced according to the player's selections.

If a self-exclusion is applied, the following actions should be in place:

- The Customer's account is closed. The Customer can no longer log in.
- The Customer must complete any tournaments that is in-running at the time of the self-exclusion.
- Ante-posts bets will be voided and refunded subject to AML/CFT regulations.²
- Contributions to progressive jackpots that were made by the Customer through gameplay prior to the self-exclusion request remain, but the Customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect.
- No Advertisement activities shall be conducted towards the Customer.
- Any payment method used by the Customer will be blocked by the Company for future use during the term of the self-exclusion period.

The Company will implement measures to prevent self-excluded Customers from creating new Customer's account under different credentials.

The Company will retain records of self-excluded requests by Customers according to the applicable record keeping requirements.

8.3 Reactivation of customer's account after self-exclusion

After the self-exclusion period ends, the Customer must request in writing (by email or chat) the unblocking of the account. The reactivation of the account cannot be instigated by the Company by re-commencing communications with the Customer.

8.4 Deposit Limits

CASIWORX offers the player with tools to control their gambling activity by setting deposit limits. Players can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).

- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.
- If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.
- Any resolved or unresolved wagers made prior to the deposit limit being set in place remains unaffected regardless of the limits set.
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8.5 Bet Limits

CASIWORX offer player to Customize betting parameters by selecting time frames, defining amounts.

Duration:

- (a) Daily Limit
- (b) Weekly Limit
- (c) Monthly

8.6 Loss Limits

CASIWORX offer player to Manage gaming responsibly with our Loss Limit Section.

Duration:

- (a) Daily Limit
- (b) Weekly Limit
- (c) Monthly

8.7 Operator-Initiated Exclusion

CASIWORX may exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour.
- The player attempts or engages in criminal activities through the operator's platform.
- CASIWORX may not exclude players solely on the basis of the amount of their winnings.

CASIWORX initiated exclusions are documented under player account, and records must be kept for at least five years.

8.8 Reality Checks

Customers shall be able to receive and see on the screen a reality check within a gambling session.

A reality check notifications offers the Customer the option to exit the gambling session e.g. log out.

This will be further detailed in version 1.3 of this Policy as per the implementation schedule of the RG Policy CGA.

9 Reactivation and Post-Cooling Off Protocol

After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account. The written request can be prompted at the point of the player attempting to log in after the exclusion period has ended or by unprompted written communication by the player via the official customer support channels. Reactivation cannot be instigated by the operator re-commencing communications with the player. Activation of a self-exclusion by a player is irreversible and irrevocable for the duration of the exclusion period selected.

CASIWORX retain records of self-excluded in accordance with the applicable retention periods. Additionally, where possible, and in line with surrounding regulations, any payment method known directly by the operator used by a self-excluded player must be blocked for future use during any exclusion period to prevent circumvention of restrictions.

10 Advertising and Promotion

CASIWORX ensures all marketing (including bonuses):

- Is not misleading or targeted at minors or vulnerable individuals.
- Not encourage excessive gaming
- Does not exaggerate chances of winning or encourage excessive play.

All advertisement done by the Company or third parties hired by the Company will include a clearly visible Responsible Gaming message or slogan

10.1 Bonus conditions

As bonuses are regarded by the CGA as advertisement activities, they fall under responsible advertisement conditions under the LOK and the CGA RG Policy.

Therefore, the Company will communicate to the Customer the terms and conditions of any bonus and/or promotion clearly. Furthermore, the Company is committed to not use any bonus to encourage excessive gaming.

10.2 Third party responsibility

The Company shall make any contracted third-party aware of their Responsible Gaming Policy and require them to adhere to it.

The Company is accountable for materials provided to affiliates, representatives, sponsorship, ambassadors social media influences, including wordings and visuals representations, in case these influencers actions and/ or statements pertain to paid placement of advertisements.

Any Customer who is currently under a period of self-exclusion (cooling off) or a permanent exclusion due to problem gambling, will be removed from all marketing correspondence lists. No marketing or promotional materials is to be sent to excluded Customers.

11 Staff Training

CASIWORX Customer support, Payment and Marketing departments employees undergo mandatory training to:

- Understand responsible gaming principles.
- Identify signs of problematic gambling behavior and direct players to appropriate support resources and Responsible Gaming tools.
- Communicate sensitively and effectively with at-risk players.

12 Data Protection and Confidentiality

Any information collected as part of responsible gaming interventions is handled in accordance with GDPR and relevant data protection laws. Player privacy is respected, and data is used solely to promote player welfare.

13 Monitoring and Review

CASIWORX Responsible Gaming Policy is regularly reviewed and updated to:

- Comply with evolving legal and regulatory requirements.
- Incorporate best practices and player feedback.
- Improve detection and prevention of gambling-related harm.