

Responsible Gaming Policy

Version 1.0 – September 2025

Company: City Limit B.V.

Website:

1. Introduction

City Limit B.V. is committed to promoting a responsible gaming environment where gambling remains an enjoyable activity. This policy outlines our approach to identifying and minimizing gambling-related harm, protecting vulnerable individuals, and meeting the Responsible Gaming obligations outlined in Curaçao's National Ordinance on Games of Chance (LOK) and enforced by the Curaçao Gaming Authority (CGA).

2. Objectives

- Prevent underage and vulnerable persons from gambling
- Provide tools for players to manage their gambling
- Identify and intervene in risky gambling behavior
- Promote informed player choices and awareness
- Meet all mandatory Responsible Gaming (RG) obligations under the CGA license

3. Age Verification

- Gambling on zenginsin.com is strictly prohibited for individuals under the age of 18.
- During registration, players must confirm they are 18+ and provide their date of birth.
- Before any withdrawals, government-issued ID verification is mandatory.
- Accounts suspected of underage use will be suspended immediately and, if confirmed, closed permanently with forfeiture of winnings and refund of deposits.

4. Player Information and Accessibility

- A dedicated Responsible Gaming (RG) section is available on zenginsin.com in both English and the primary language of the target market.
- The RG section includes:
 - Overview of Responsible Gaming principles
 - Links to self-assessment tools
 - Direct access to player protection tools (limits, cooling-off, self-exclusion)
 - Contact options for customer support
 - Links to support organizations (e.g., GamCare, Gambling Therapy)
- The footer of every page includes:
 - 18+ warning
 - Link to the RG section
 - CGA license number and digital seal
 - Company details and support contacts

5. Player Protection Tools

The company provides the following tools to help players manage their gambling behavior:

5.1 Deposit Limits

- Players can set daily, weekly, or monthly deposit limits.
- Limit increases take effect after 24 hours; decreases are applied immediately.

5.2 Reality Checks

- Optional session reminders with:
 - Time played
 - Net win/loss
 - Prompt to pause or end session

5.3 Time-Out / Cooling-Off

- Players can take a break from gambling for
 - 24 hours, 7 days, 1 month, or 3 months
- During this time:
- No deposits or bets are allowed
- Account remains accessible for withdrawals
- Marketing messages are stopped if opted out

5.4 Self-Exclusion

- Irrevocable exclusion from all gambling on zenginsin.com for:
 - 1 year, 3 years, 5 years, 10 years, or lifetime
- No login, deposits, or bets allowed
- Marketing is automatically disabled
- Self-exclusion applies across all domains under the license

6. Behavior Tracking & Monitoring

Our systems and staff monitor player behavior for signs of gambling-related harm:

Indicators include:

- Sudden increase in deposits or wagers
- Cancelling withdrawals repeatedly
- Frequent sessions or prolonged play
- Requests for bonuses or signs of distress

Actions may include:

- Sending responsible gaming reminders
- Applying cooling-off or deposit limits
- Requesting source of funds
- Temporarily suspending the account
- Permanent exclusion if warranted

7. Player Self-Assessment

Players can access a self-assessment questionnaire in the RG section, based on tools like:

- CAGE Questionnaire

- Gamblers Anonymous 20 Questions

If a player is identified at risk, they are encouraged to use available tools or seek support.

8. Staff Training

All customer support, compliance, and VIP staff receive RG training including:

- Identifying signs of gambling problems
- Having sensitive, structured conversations
- Directing players to appropriate tools and help
- Ensuring compliance with intervention protocols

Training is repeated at least once annually, with logs maintained by the MLRO or RG Officer.

9. Advertising and Marketing

The company ensures that all advertising:

- Includes a responsible gaming message
- Does not target vulnerable persons or minors
- Does not depict gambling as a financial solution, or link it to alcohol, drugs, seduction, or social success
- Is not misleading, aggressive, or emotionally manipulative

All affiliates and third-party marketers are required to comply with this policy.

10. Roles and Responsibilities

- A Responsible Gaming Officer or oversees implementation and monitoring of this policy.
- Regular internal reports are submitted to management at least once annually.
- All major updates to this policy are submitted to the CGA for review.

11. Operator-Initiated Exclusion

The company reserves the right to suspend or permanently exclude players if:

- They show repeated signs of problem gambling
- Breach responsible gaming terms
- Engage in behavior that poses regulatory or reputational risk

All exclusions are documented and retained for at least 5 years.

12. Review and Updates

This policy is reviewed annually or upon regulatory updates. Any material change is:

- Approved by management
- Shared with the CGA via the license portal
- Updated on the website as required