

Responsible Gaming Policy (CW)

Version	Date	Description
1.0	15 June 2022	Initial Responsible Gaming Policy defining baseline player protection measures, staff training requirements, and compliance with Curaçao gaming regulations
2.0	15 August 2025	Comprehensive update aligned with new LOK/CGA regulatory framework. Expanded sections on player monitoring, intervention protocols, enhanced RG tools, and clearer enforcement mechanisms. Added structured documentation requirements and improved reporting standards

1. Policy Overview

Slotbox N.V. ("Slotbox" or "the Operator") is committed to providing a safe, fair, and responsible gaming environment. As a holder of a Curaçao gaming license, Slotbox adheres to all requirements set by the Curaçao Gaming Authority (CGA) under the Landsverordening op de Kansspelen (LOK). This policy aligns with CGA guidelines and covers all online gambling operations of Slotbox. Its purpose is to protect players — especially minors and other vulnerable persons — from gambling-related harm, and to ensure our practices meet high standards of integrity and social responsibility.

- **Scope:** Applies to all Slotbox products and services, employees, and third parties representing Slotbox. Includes mandatory responsible gaming measures and additional safeguards tailored to online operations and any identified higher-risk areas (VIP/high-stakes play).
- **No Credit Policy:** Slotbox maintains a strict no-credit policy. All gambling must be funded by the player's own deposits.
- **Responsible Gaming Governance:** A designated Responsible Gaming Officer (RGO), contactable at compliance@slotbox.com) oversees implementation and enforcement, monitors effectiveness, and reports at least annually to senior

management. Material changes are approved by management and reported to the CGA as required.

2. Definitions

- **CGA:** Curaçao Gaming Authority
 - **LOK:** National Ordinance on Games of Chance of Curaçao
 - **Operator:** Slotbox N.V.
 - **Games of Chance:** Games where outcomes are predominantly determined by chance
 - **Minor:** Person under 18. Higher local age requirements are respected where applicable
 - **Vulnerable Person:** As defined in LOK 1.1(h), a person at heightened risk of problem gambling or unable to make informed decisions
 - **Responsible Gaming (RG) Tools:** Self-assessment, limits, cooling-off, self-exclusion, etc.
 - **Cooling-Off Period (Time-Out):** Short, temporary break from gambling
 - **Self-Exclusion:** Long-term or permanent exclusion from all gambling with Slotbox
 - **Operator-Initiated Exclusion:** Exclusion imposed by Slotbox based on identified risk
 - **Deposit Limit:** Cap on deposits over a period (daily, weekly, monthly)
 - **Reality Check:** Periodic notifications or timers to remind players of session duration and spend
 - **Responsible Gaming Message:** Short warnings such as “Gamble Responsibly – 18+ only”
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3. Prevention of Underage Gambling

Preventing access by minors is a legal and ethical obligation. Slotbox prohibits anyone under 18 (or a higher local legal age) from registering, depositing, or

gambling. Controls combine clear player messaging, pre-play verification, ongoing monitoring, and documented responses when underage use is suspected or confirmed.

3.1 Age Verification Procedures

Our approach layers attestations, documentary checks, and risk-based triggers to confirm age before gambling proceeds and throughout the customer lifecycle.

- **At Registration (Pre-Access):**

- Player enters date of birth and explicitly confirms they are 18+ (or the higher local legal age).
- If the entered age is under 18, registration is automatically rejected and access is blocked.

- **Documentary Verification (KYC):**

- A valid government-issued ID (passport, national ID, or driver's license) is required to verify age and identity.
- Verification is completed before a first withdrawal and may be required earlier based on risk thresholds (e.g., activity or account events).
- Secondary checks can supplement ID verification when appropriate, such as electronic database lookups, payment method verification, or biometric selfie comparison. These checks do not replace the requirement for official ID.

- **Ongoing Monitoring:**

- Accounts with any doubt regarding age are immediately restricted from depositing or gambling until verification is conclusively completed.
- Systems monitor for attempts to bypass controls, including the use of another person's credentials or payment details.

- **If a Minor Is Identified:**

- Immediate account closure.
- Deposits are returned to the source where possible; winnings and bonuses are forfeited in line with legal requirements.

- Clear communication is provided explaining the closure due to underage gambling and signposting responsible gambling information.
- Full records of the verification process, checks completed, and actions taken are maintained for regulatory inspection.

3.2 Parental Controls and Internet Filtering

We encourage responsible adults to use device and network tools to prevent underage access to gambling content, especially on shared devices.

- **Parental Control Software:**

- Reputable options exist to restrict access to gambling sites and apps (for example, BetBlocker, GamBlock, Gamban). References are provided for player convenience without brand endorsement.

- **Secure Account Practices:**

- Registered adults should not store usernames, passwords, or payment details on shared devices.
- Maintain secure device profiles and avoid auto-fill of sensitive credentials.

- **Clear Under-18 Messaging:**

- “No Under 18” notices and age-restricted warnings are displayed prominently on the website, including in the footer, Terms and Conditions, and during signup.

4. Player Information and Access to RG Resources

Players must be able to find clear guidance and use responsible gaming tools at any time. Slotbox provides a dedicated Responsible Gaming (RG) area, persistent navigation, and consistent messaging so players can self-serve or contact support without friction.

4.1 Dedicated Responsible Gaming (RG) Section

The RG section is a clearly labeled area of the site that consolidates education, tools, and support in one place.

- **Educational content:** Plain-language explanations of safer gambling, early warning signs of harm, and practical tips for staying in control.
- **Direct tool access:** One-click entry points to all self-service controls, including self-assessment, setting or changing limits, requesting a cooling-off period, and initiating self-exclusion.
- **Support channels:** Clear routes to contact customer support or the Responsible Gaming team via email, live chat, or phone when assistance is needed.
- **Language coverage:** Provided in English and primary languages for target markets. Where translations differ, English is the authoritative reference.

Usage expectations for the RG section:

- It remains accessible whether or not a player is logged in.
- Links use descriptive labels (e.g., "Set a deposit limit," "Take a short break") to reduce ambiguity.
- Content is concise, avoids jargon, and reinforces that tools can be used at any time.

4.2 Visibility on Homepage and Footer

Responsible gaming visibility is embedded across key site surfaces to minimize discovery time.

- **Navigation links:** A prominent "Responsible Gaming" link appears in the footer on every page so players can reach the RG section in a single click from anywhere on the site.
- **Footer disclosures:** The footer includes the 18+ prohibition, the full legal name and registered address of Slotbox N.V., the Curaçao license number, and the CGA digital seal that displays current license details when selected.
- **Support organizations:** The footer also references recognized problem-gambling support organizations so players can identify avenues for external help quickly.

Presentation expectations:

- Links and disclosures are readable and not hidden behind expandable sections.
- The age restriction notice is consistently displayed alongside other legal disclosures.

4.3 Inclusion in Terms & Conditions (T&Cs)

Responsible gaming commitments are reiterated in the T&Cs so players encounter them during onboarding and whenever reviewing service rules.

- **Coverage:** Underage gambling prohibition and summaries of available RG tools with signposts to the RG section for full details.
- **Accessibility:** T&Cs are available within one click from the homepage.
- **Acknowledgment:** During registration, players accept the T&Cs, including the responsible gaming provisions and reminders to gamble within their means.

Drafting expectations for T&Cs references:

- Use clear cross-references to RG tools rather than repeating detailed processes.
- Keep responsible gaming sections easy to locate via headings and anchors.

4.4 Gambling Support Information

Players are guided to recognized third-party support resources alongside internal tools.

- **Coverage:** Contact information is maintained for organizations such as Gamblers Anonymous, BeGambleAware, Gambling Therapy, GamCare, and the National Council on Problem Gambling, as applicable to target markets.
- **Placement:** References appear in the RG section, footer, and help pages so they are visible in multiple contexts.
- **Communications:** Responsible-gaming taglines and age restrictions are included in player communications and advertising as standard reminders.

Presentation expectations:

- Support references are informational and neutral.

- Messaging emphasizes availability of help without directing players away from using on-site tools when appropriate.
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5. Player Self-Assessment and Account History

Players should be able to understand their own play patterns and make informed choices. Slotbox provides transparent account records and private, self-guided screening tools, alongside prompts to consider protective controls.

5.1 Account History and Activity Statements

Comprehensive, self-serve records enable reflection on spending and play over time.

- **Transaction history:** A running record of deposits, withdrawals, and bonuses credited, with dates and amounts.
- **Gaming history:** Logs showing games played, stakes wagered, wins and losses, and timestamps. Where applicable, session duration is included.
- **Time visibility:** Records include timestamps to help players see frequency and timing of activity.
- **Availability:** At least the last six months are accessible online at any time. Older statements can be requested from support within a reasonable timeframe.
- **Use cases:** Players can review trends, set personal budgets, or decide to apply limits or breaks based on observed patterns.

Presentation expectations:

- Information is clearly labeled and filterable by date range where possible.
- Totals and net figures are easy to identify to reduce misinterpretation.

5.2 Self-Assessment Tools and Questionnaires

Anonymous self-assessments help players evaluate risk and consider next steps.

- **Tools available:**
 - Gamblers Anonymous "20 Questions," with guidance on interpreting the number of "Yes" responses.

- **Privacy:** Results are shown privately to the player and are not used automatically to limit play.
- **On-page guidance:** After completing a questionnaire, players are prompted with practical next steps, such as setting deposit or loss limits, taking a cooling-off period, initiating self-exclusion, contacting support, or seeking external help.
- **Access:** Assessments are available at any time from the RG section and can be taken without notifying staff.

Usage expectations:

- Questions are presented in clear, neutral language with straightforward answer options.
- Explanations avoid stigma and emphasize support and control.
- Links to limits, breaks, and support are adjacent to results to reduce friction.

6. Behavior Monitoring and Intervention

Slotbox combines automated analytics with trained human review to identify risk early and intervene supportively. Single signals do not automatically label a player; patterns and context are assessed holistically.

6.1 Proactive Monitoring and Risk Indicators

Monitoring focuses on material changes and combinations of activity that may indicate loss of control.

- **Deposits and wagering:** Sudden spikes in frequency or amounts compared with a player's baseline.
- **Session duration and timing:** Very long or continuous sessions, or consistently late-night activity.
- **Failed transactions:** Repeated declines or insufficient-funds attempts.
- **Withdrawal behavior:** Frequent reversal or cancellation of withdrawals, suggesting chasing losses.

- **RG tool patterns:** Repeatedly setting, then raising or removing limits, short repeated cooling-off periods, or cyclical self-exclusion patterns.
- **Financial stress indicators:** Maxed cards or using multiple payment methods in quick succession.
- **Multiple account attempts:** Duplicate or near-duplicate registrations intended to circumvent controls.
- **Support interactions:** Communications showing distress, desperation to recover losses, or aggressive bonus-seeking.

Notes on interpretation:

- Indicators are evaluated in combination and over time rather than in isolation.
- Machine-assisted scoring supports, but does not replace, trained staff judgment.

6.2 Identification and Intervention Process

A progressive, documented process guides review and action.

- **a) Flagging and review:** Alerts from systems or staff are logged to the player profile and reviewed by an RG specialist with relevant context (e.g., recent losses, prior contacts).
- **b) Risk assessment:** A responsible gaming profile is maintained and a risk level assigned (low, moderate, high). Findings and rationale are recorded.
- **c) Player contact:**
 - For moderate risk, in-product prompts or emails provide supportive messaging and one-click access to tools.
 - For higher risk, trained staff may reach out directly (email or phone) to explain available tools and offer assistance in enabling them.
- **d) Escalation:** If risk persists or worsens, protective measures may be applied, including mandatory limits, temporary suspensions, or where necessary, operator-initiated exclusion.
- **e) Integrity of withdrawals:** Responsible gaming measures are never used to block or delay standard withdrawals. Payout processing continues in line with

normal procedures.

Documentation and retention:

- All RG interactions, indicators prompting action, decisions taken, and follow-ups are recorded and retained in line with legal requirements. Records are available for regulatory inspection.
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7. Cooling-Off Periods (Short-Term Breaks)

Cooling-off gives players a temporary, self-imposed break from gambling with clear start and end dates. It is designed for short pauses without permanently closing the account.

7.1 Overview

- **Player-initiated:** Activated in account settings or by contacting support. Staff never attempt to dissuade a player from using this tool.
- **Effect during the period:** Gambling functions are disabled. Players may still withdraw existing balances but cannot deposit or place bets.
- **Automatic return:** At expiry, the account reactivates automatically unless the player extends the break or switches to self-exclusion.

Usage expectations:

- The interface distinguishes cooling-off from self-exclusion and explains key differences in plain language.
- Confirmation screens are neutral and exist only to prevent accidental selections.

7.2 Duration Options

Preset durations accommodate common needs:

- 24 hours
- 7 days
- 1 month (30 days)

Notes:

- Minimum duration is 24 hours.
- Players may take consecutive breaks or choose self-exclusion for longer protection.

7.3 Scope

- **Default scope:** Applies to all gambling activity on Slotbox.
- **By product vertical (optional):** Where multiple verticals exist, players may choose to limit specific categories.
- **Brand coverage:** Applies across Slotbox brand(s) operated by Slotbox N.V. under the license.

Presentation expectations:

- Scope choices are explicit and not pre-selected. Players must actively choose any optional scoping.

7.4 Implementation

- **Immediate enforcement:** Upon confirmation, active sessions are ended and further play is blocked for the duration.
- **Irrevocability:** Players cannot cancel or shorten an active cooling-off. They may extend the period or escalate to self-exclusion.
- **Funds access:** Withdrawals remain available; deposits are blocked.
- **Marketing preferences:** Players can opt out of promotional communications during the break. Longer breaks default to opt-out.

Operational expectations:

- Support can apply a requested cooling-off if the player cannot do so online, actioned promptly.
- System records include timestamps and selected duration for auditability.

7.5 After the Period

- **Reactivation:** Access to gambling features resumes automatically at the end of the selected period.

- **Communications:** Messaging remains responsible. If the player opted out of marketing, that preference persists until the player changes it.
 - **Next steps:** Players are encouraged to consider limits on return or to initiate another break or self-exclusion if needed.
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8. Self-Exclusion (Long-Term)

Self-exclusion is intended for players who need a sustained break or recognize serious risk. It blocks gambling access for a fixed period or indefinitely and cannot be ended early.

8.1 Overview

- **Player-initiated and irrevocable:** Chosen in account settings or via support. Once set, it cannot be undone until the period lapses and reactivation procedures are completed.
- **Total gambling lockout:** Login to the gaming platform is blocked. All gambling features are unavailable and new account creation is prevented.
- **All brands and platforms:** Applies across Slotbox brand(s) operated by Slotbox N.V. under the license.
- **Marketing suppression:** All promotional communications cease for the duration, with appropriate suppression lists maintained.

Usage expectations:

- The interface clearly differentiates self-exclusion from cooling-off and describes consequences in plain language.
- A brief confirmation step may be used solely to prevent accidental selection.

8.2 Duration Options

Fixed periods provide meaningful protection:

- 1 year (minimum)
- 3 years
- 5 years

- 10 years
- Lifetime (indefinite)

Notes:

- Shorter breaks are handled via cooling-off.
- Selection requires an explicit choice by the player.

8.3 Implementation

- **Immediate account lock:** Self-exclusion requests are processed with highest priority. If initiated online, the lock is immediate. If requested via support, it is actioned urgently.
- **Interim gambling handling:** Wagers placed after a support request but before processing are voided where applicable; stakes are returned.
- **Account status:** Login is blocked during exclusion. Remaining balances can be withdrawn. If login is not possible, support facilitates withdrawals after standard security checks.
- **Future or in-progress bets:** Where applicable, unsettled future bets may be voided and refunded; in-progress events are handled case-by-case in line with policy while preventing further play.
- **Circumvention prevention:** Registration and payments are checked against exclusion data to block new accounts and known payment instruments.
- **Record-keeping:** Requests, durations, timestamps, and actions taken are logged and retained per legal requirements for audit and regulatory inspection.

Operational expectations:

- Staff do not question or negotiate once a player has chosen self-exclusion, other than confirming intent where a confirmation step is presented.
- All communications remain strictly administrative or supportive, with no promotion.

8.4 Reactivation After Self-Exclusion

Reactivation is deliberately controlled and initiated only by the player after the exclusion lapses.

- **Player request required:** Slotbox does not solicit a return. The player must affirmatively request reactivation (e.g., in writing or via support).
- **Cool-down window:** A short waiting period (e.g., 24 hours) may be applied as a final reflection buffer.
- **Verification and review:** Identity is re-verified and the exclusion period confirmed complete. Relevant history is reviewed before re-enabling access.
- **Post-return safeguards:** RG guidance is provided, marketing opt-out remains until changed by the player, and staff maintain heightened vigilance for early signs of harm.

8.5 Operator-Initiated Exclusion

In severe cases, Slotbox may impose an exclusion to protect the player or the platform.

- **Triggers:** Evidence of serious gambling harm, criminal or fraudulent activity, or significant breaches of Terms & Conditions.
- **Actions:** The account is closed, gambling access barred, and marketing suppressed. Any balances are returned where appropriate and lawful.
- **Documentation:** Reasons, evidence, and actions are thoroughly recorded and retained for at least the required period.

9. Player Financial Limits

Financial limits enable players to pre-commit to affordable levels of spend and time. Limits are simple to set, immediate when made stricter, and delayed when relaxed to prevent impulsive changes.

9.1 Deposit Limits

Players cap total deposits over defined periods with real-time enforcement.

- **Periods available:** Daily, weekly, and monthly.

- **How it works:** The system tallies deposits against the selected cap. If a new deposit would exceed the cap, it is declined and the player is notified that the limit has been reached.
- **Making limits stricter:** Decreases apply immediately upon confirmation.
- **Relaxing limits:** Increases or removals only take effect after a 24-hour waiting period and, where used, a confirmation step at the end of that window.
- **Scope:** Deposit limits restrict new deposits only. Existing balances and settled funds are unaffected.

Usage expectations:

- Interfaces display remaining allowance for the current period.
- Explanations clarify how period rollovers work (e.g., daily, weekly, monthly windows).

9.2 Other Limits

Additional optional limits address losses, wagering volume, session duration, and single-bet size.

- **Loss limits:** Cap the maximum net loss a player is willing to incur over a period. When reached, further wagering is blocked until the period resets.
- **Wager/stake limits:** Cap total stakes over a period to control play volume regardless of outcomes.
- **Session time limits:** Restrict active playtime per session or per day. When the limit is reached, the player is logged out or prevented from starting new play until the next window.
- **Bet size limits:** Cap the maximum amount per single wager or per specific game categories.

Change rules:

- Making limits stricter takes effect immediately.
- Relaxing limits requires a waiting period (usually 24 hours) before the change applies.

Presentation expectations:

- Clear labels and examples help players choose appropriate caps.
- Controls are accessible from the RG section and relevant in-product surfaces.

9.3 Ongoing Bets and In-Progress Play

Limits are enforced promptly while avoiding unfair interruption of active wagers or rounds.

- **Active rounds or events:** When a limit or time cap is hit mid-activity, the player may complete the current round or ongoing event, but cannot start new rounds or place additional bets.
 - **Post-enforcement:** Once the activity concludes, enforcement is strict until the relevant period resets or the session time window reopens.
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10. Staff Training and Capacity

A robust responsible gaming program depends on knowledgeable staff, clear procedures, and supportive culture. Training equips frontline and supporting teams to recognize risk, communicate effectively, and apply tools consistently.

10.1 Training Program Overview

Training is provided to all relevant roles, including Customer Support, VIP management, marketing, compliance, product, and payments operations.

- **Core topics:** Nature of problem gambling and harm, recognizing signs of distress, empathetic and non-judgmental communication techniques, use of RG tools (limits, cooling-off, self-exclusion), escalation paths, and legal/policy requirements.
- **Procedural proficiency:** How to assist players with setting limits or exclusions, when and how to escalate to RG specialists or management, and how to document interactions accurately.
- **Marketing ethics:** Standards for responsible messaging and audience targeting, including suppression of self-excluded or vulnerable players and inclusion of RG taglines and age restrictions.
- **Resources awareness:** Ability to provide players with information about recognized third-party support organizations where appropriate.

Delivery expectations:

- Training uses practical examples and role-plays relevant to typical support and VIP interactions.
- Materials reflect current policy and are updated when requirements change.

10.2 Training Frequency and Assessment

- **Onboarding:** New employees complete RG training at start of role or as soon as practicable.
- **Refreshers:** Annual refresher training for all relevant staff to reinforce concepts and cover updates.
- **Assessment:** Quizzes or practical evaluations check understanding. Additional coaching is provided where needed.
- **Records:** Completion dates, topics covered, and assessment outcomes are recorded for audit and regulatory review.

10.3 Staff Responsibilities and Support

- **Frontline empowerment:** Customer Support can take immediate protective actions within defined authority (e.g., apply a cooling-off on request) and escalate higher-risk cases promptly.
- **Specialist oversight:** Managers and the Responsible Gaming Officer are available to advise and to handle complex cases, including potential operator-initiated exclusions.
- **Wellbeing first:** Player welfare takes precedence over short-term revenue. Staff are not penalized for taking protective actions that reduce play.
- **Internal support:** Debriefs and support are available for staff after difficult interactions to maintain resilience and learning.

Documentation expectations:

- Training completion and refresher schedules are tracked centrally.
- Updates to policy trigger updates to training content and communication to affected teams.

11. Marketing and Advertising Code of Conduct

Marketing must be socially responsible, transparent, and never exploit vulnerable individuals. Standards apply to all channels and partners acting on Slotbox's behalf.

11.1 No Targeting of Minors or Vulnerable Groups

- **Audience safeguards:** Ads are placed only where the audience is predominantly 18+.
- **Creative restrictions:** No imagery, themes, or personalities likely to appeal to minors; no persons who are or appear to be under 25 in gambling contexts.
- **Suppression:** Self-excluded players and those flagged as vulnerable are excluded from targeted campaigns.
- **Sensitive timing:** No campaigns designed to exploit recent losses, limit changes, or indicators of distress.

11.2 Truthful and Non-Misleading Messaging

- **No wealth claims:** Do not imply gambling is a path to financial gain or debt relief.
- **Chance vs. skill:** Do not overstate skill in games of chance. Represent odds and outcomes fairly.
- **Offer clarity:** Promotions are described accurately with prominent key terms and conditions.

11.3 Tone and Content Guidelines

- **No glamorization of excess:** Avoid depictions of nonstop or high-risk gambling as aspirational.
- **No linkage to other vices:** Do not pair gambling with alcohol or drugs, or imply social or sexual success from gambling.
- **Respectful tone:** Keep content upbeat but responsible, avoiding pressure or sensationalism.

11.4 Bonus and Promotion Communications

- **Transparent terms:** Clearly state material conditions such as wagering requirements and time limits.
- **Choice and control:** Provide options that do not encourage overspending (e.g., smaller deposit bonuses available).
- **No undue urgency:** Avoid pressure tactics that could trigger impulsive play.

11.5 Third-Party Marketing and Affiliates

- **Contractual standards:** Affiliates and partners are required to follow these guidelines.
- **Monitoring:** Affiliate content is reviewed. Non-compliance results in corrective action or termination.
- **Ambassadors/sponsorships:** Responsible messages are included and harmful behaviors are not displayed.

11.6 Mandatory Responsible Gaming Message

- **Taglines and symbols:** Include clear RG taglines and 18+ indicators on all materials.
- **Visibility:** Disclosures are readable and not hidden in fine print.

11.7 Monitoring and Compliance

- **Pre-release checks:** Compliance review for major campaigns and creatives.
- **Archiving:** Maintain records of ads and distributions for audit.
- **Issue response:** Investigate complaints promptly and remediate, including pulling content and retraining partners if necessary.

12. Enhanced Responsible Gambling Measures

Beyond baseline controls, Slotbox incorporates additional measures to prompt reflection in-session, expand player control, and drive continuous improvement.

12.1 Parental and Self-Blocking Tools (Internet Filtering)

- **Third-party blockers:** References to reputable tools (e.g., BetBlocker, GamBlock, Gamban) help players and families restrict access to gambling content across devices.
- **Device hygiene:** Encourage secure device profiles, passwords, and avoiding shared credential storage.
- **Positioning:** Tools are presented as optional, independent services; information is provided without brand endorsement.

12.2 Automated Warnings and Pop-Ups (Direct Player Interaction)

- **In-session pop-ups:** When extended or risky play is detected, a prominent message pauses gameplay and offers one-click access to limits, breaks, or support.
- **Threshold reminders:** Players can configure reality-check prompts at chosen intervals that require acknowledgment before resuming play.
- **Follow-up:** Higher-risk triggers may prompt supportive outreach from trained staff.

12.3 Reality Checks and Time Alerts

- **On-screen visibility:** A clock in the player's timezone and a session timer display elapsed play time.
- **Periodic prompts:** After defined thresholds (e.g., hourly), a message summarizes time elapsed and net change and asks whether to continue or end the session.
- **Customization:** Players may opt for shorter intervals and can combine reality checks with time limits for stronger control.

12.4 Continuous Improvement of RG Measures

- **Data-driven refinement:** Use analytics to improve detection models and earlier identification of risk patterns.
- **Research awareness:** Track industry best practices and adopt effective measures where feasible.

- **Player feedback:** Gather feedback on RG tools to enhance usability and effectiveness over time.
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13. Compliance, Monitoring, and Reporting

Slotbox maintains ongoing oversight of responsible gaming controls through internal monitoring, technology checks, record-keeping, and regulator-facing reporting. Governance emphasizes continual improvement and clear accountability.

13.1 Internal Compliance and Monitoring

- **Policy accessibility:** The RG policy informs operational manuals and support scripts and is summarized publicly for transparency.
- **RGO oversight:** The Responsible Gaming Officer monitors age verification, tool functionality, and staff procedures. Spot checks and audits are performed and deviations are documented and addressed.
- **Technology audits:** Product and IT teams periodically test RG features such as self-exclusion, deposit limits, and reality checks. Any issues are remediated promptly and assessed for player impact.
- **Record-keeping:** Secure logs are maintained for verification records, exclusion registers, intervention triggers and actions, training completions, and marketing suppression lists. Records are retained per legal requirements and are available for internal review and audit.

13.2 Reporting to CGA and Regulatory Oversight

- **Policy submission:** The RG policy is filed with the Curaçao Gaming Authority as required, and material changes are reported promptly.
- **Periodic reporting:** Annual RG reporting includes statistics such as counts of self-exclusions and cooling-off activations, interventions, training activity, and notable trends or improvements.
- **Incident reporting:** Serious incidents (e.g., underage access or significant harm cases) are escalated to the regulator in line with protocols, with root-cause analysis and corrective actions documented.

- **Collaboration:** Slotbox remains responsive to CGA directives and integrates new requirements, such as centralized exclusion schemes, if introduced.

13.3 Policy Review and Updates

- **Annual review:** The policy is reviewed at least annually and whenever material changes in law, guidance, technology, or internal learnings arise.
- **Version control:** Revisions are documented, communicated to staff, and reflected in training materials. Player-facing communications are updated if changes affect player tools or processes.

13.4 Accountability and Ethics

- **Culture and leadership:** Executive management receives periodic RG updates and allocates resources to ensure program effectiveness.
 - **Employee voice:** Staff can raise RG suggestions or concerns; management investigates and acts where appropriate.
 - **Ethical standard:** Player welfare and compliance take precedence. Responsible gambling considerations inform strategic decisions.
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