

Responsible Gambling Policy

Stake.com

(in accordance with articles described in LOK)

Version:	1.0
Created by:	Head of Responsible Gaming
Classification:	Internal Use
Brand:	Stake.com

Document Control History			
Date	Version	Description	Created by
18/05/2025	v1.0	Document Creation – Responsible Gambling Policy of Stake	Head of Responsible Gaming

Contents

1. Purpose and Scope.....	5
2. Responsible Gambling.....	5
2.1 Provision and Display of Responsible Gambling Information	5
2.2 Activity History	6
3. Contact Channels Available - Customer Service & Responsible Gambling.....	6
3.1 Customer Support Services Availability	6
3.2 Responsible Gambling Team Availability.....	6
3.3 Contact Methods and Direct interaction between the customer and the Team	6
4. Activity Alerts	7
5. Self-Exclusion	7
5.1. Increase of the Self-Exclusion Duration:	7
5.2. Initiate or Revocation - Self-Exclusion:.....	8
5.3. Revocation of Self-Exclusion:	8
5.4. Self-Exclusion Records.....	8
6. Cooling Off Option:.....	8
7. Account Closure.....	8
8. Gambling Limits	9
8.1. Gambling Limits and Restrictions Applied.....	9
8.1.1. Loss Limits.....	9
8.1.2. Deposit Limits.....	9
8.1.3. Wager Limits.....	9
8.2. Setting Simultaneous Limits.....	9
8.3. Increasing or Decreasing Limit Duration.....	9
9. Responsible Gambling Intervention Programme.....	10
9.1. Identification of At-risk Behaviour Using Behavioural Sciences	10
9.2. Evaluating Risk Indicators to Detect Problem Gambling.....	10
9.3. Interventions	11
9.3.1. Communication Mediums For Interventions	11
9.3.2. Risk Based Interventions	11
9.3.3. Activity Restriction	12
10. Evaluation and Efficacy	13
11. Training	13
11.1. Series One – Introductory Training on Gambling Harms	14
11.2. Series Two – Responsible Gambling Tools	14
11.3. Series Three – Practical Training	14

11.4. Series Four - Specialised Training for Responsible Gambling	14
11.5. Implementation and Frequency of Training	15
12. Help Organizations	15
13. Gambling Blocking Services	15
14. Document Management.....	16

1. Purpose and Scope

1.1 Purpose

The purpose of this document is to set and to describe the technical- organizational responsible gambling measures adopted by Stake accordingly with the legislative and administrative provisions in force in Curaçao. The document provides the requirements for all employees of Stake (hereafter, referred to as ‘Stake’), ensuring that the company identifies and interprets risks associated with problem gambling, while being equipped to assist, manage, and mitigate the risks of gambling harm.

1.2 Scope

This policy applies to all employees at Stake. As an organization, Stake recognizes their social responsibility towards its customers for gambling to be enjoyed in a safe and controlled environment, ensuring that all customers engage in gambling responsibly. This policy establishes Stake’s commitment to minimizing gambling-related harm and maintaining compliance with all regulatory obligations set forth by the Curaçao Gaming Authority.

2. Responsible Gambling

2.1 Provision and Display of Responsible Gambling Information

As part of our compliance with regulatory requirements and industry’s best practices, Stake must:

- ☐ display responsible gambling (hereafter referred to as ‘RG’) information within their designated responsible gambling page
- ☐ Through customer service representatives that interact with customers on Stake’s communication platform through messaging mediums which include but are not limited to E-Mail or chat service. The individuals must be trained to provide information on responsible gambling and direct customers to appropriate resources when necessary-see specific section on training.

Clear and concise messaging relating to responsible gambling must include but not limited to:

- ☐ Information that gambling can be harmful if it is not controlled;
- ☐ Information about responsible gambling tools and how to apply them;
- ☐ The minimum age required for participation in the gambling product offering is 18+ and must be visible on the Stake website;
- ☐ Stake must make readily available to customers contact information on institutions and health professionals that can guide customers on problem gambling, organizations dedicated to treating and assisting people experiencing gambling harm;
- ☐ Contact details to Stake customer support service, including operating hours;
- ☐ Stake must make available a self-assessment test under the Responsible Gambling section to provide players with the necessary information to make informed decisions regarding their gambling activities;

- ☐ Information on gambling device block services;
- ☐ Contact information to report a complaint/dispute related to the operation or services provided by Stake;
- ☐ Information regarding the risks of gambling, rules on games / odds of winning.

2.2 Activity History

Stake must make available to the customer a record of the transactions carried out in respect of at least the last six months. This report shall include the following for each activity carried out:

- ☐ Timestamp of the event.
- ☐ Type of game.
- ☐ The bet amount.
- ☐ The amount of winnings and/or refunds.

Longer periods of transactions may be requested from the operator and must be provided within 10 working days. If Stake can show that this timeframe is not reasonably achievable given the circumstances, CGA may grant an extension for a period it deems appropriate.

3. Contact Channels Available - Customer Service & Responsible Gambling

3.1 Customer Support Services Availability

Stake must ensure that contact channels are available to customers for the dissemination of responsible gambling for seven days a week and for no less than eight hours a day. A customer must have the ability to contact a support representative during the mentioned period not limited to general assistance, technical issues or responsible gambling queries.

3.2 Responsible Gambling Team Availability

Stake must ensure that a dedicated Responsible Gambling Team is available and operational for seven days a week and no less than 8 hours a day. The Responsible Gambling Team is a business function unit that specializes in the monitoring of problem gambling indicators as well as support stakeholders in identifying and addressing the risks of problem gambling.

3.3 Contact Methods and Direct interaction between the customer and the Team

Stake provide to the Customer the following contact and interaction channels with the Customer care Team:

- ☐ Email, and
- ☐ Live Chat.

More specifically, these are:

- ☐ contact channels for the dissemination of responsible gambling, the prevention of pathological gambling and the information of the player wishing to adopt responsible gambling behaviour, to which the player can directly access on his own initiative, continuously available for seven days a week and no less than eight hours per day,

consisting of e-mail interaction systems and live chat as well as recorded information and dissemination libraries, accessible on the game offer presentation system;

- ☐ direct interaction contact channels with the player, activated in relation to pathological gambling risk assessments and also player interaction initiatives on other contact channels, at the initiative of Stake's staff, Operating for seven days a week and for a minimum of eight hours a day, dedicated to the exercise of functions of monitoring and intervention on players who highlight possible risks from pathological gambling.

Contact information must be clearly visible and easily accessible on the platform, including the homepage.

4. Activity Alerts

Stake must offer the ability to set an activity alert in accordance with the time spent specified by the customers themselves in minutes. The customer must have the ability to implement the activity alert via the designated responsible gambling page.

Once the specified time limit has been reached, an activity alert modal must be presented to the customer, with the options prompted to either 'continue' or 'end session'. The activity alert must run continuously in the specified time periods selected by the customer.

5. Self-Exclusion

Stake must make a voluntarily self-exclusion option available where the customer is able to apply restrictions on their account prohibiting any gambling activity for at least a minimum period of one year, including the option to set an exclusion for a lifetime.

Stake customers can choose to self-exclude for defined periods or lifetime, namely;

- ☐ 1 year
- ☐ 3 years
- ☐ 5 years
- ☐ 10 years
- ☐ Lifetime

During the self-exclusion period:

- ☐ customer cannot create a new account.
- ☐ customer will not be targeted by any Stake commercial communication on gambling website, products and services.
- ☐ customer will be prohibited from making deposits and placing bets.
- ☐ Withdrawal of winnings and cash balances remains permitted.

5.1. Increase of the Self-Exclusion Duration:

A notice by the customer requesting to increase an existing self-exclusion will be actioned upon receipt by Stake.

A customer that enters into a new self-exclusion must receive a confirmation email, including the details of the self-exclusion terms and effective date, in line with what the customer has been informed.

5.2. Initiate or Revocation - Self-Exclusion:

To initiate the self-exclusion, a user must proceed by:

- ☐ entering a self-exclusion via the Stake Responsible Gambling webpage or;
- ☐ contacting Stake customer support team via E-Mail or chat.

Activation of a self-exclusion by a player is irreversible and irrevocable for the duration of the exclusion period.

5.3. Revocation of Self-Exclusion:

After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account.

The request must be written communication by the player via the official customer support channels. Reactivation cannot be instigated by Stake 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.

5.4. Self-Exclusion Records

Stake must maintain a register of those self-excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the customer).

6. Cooling Off Option:

Stake must offer customers the option to activate a cooling-off period, during which they are temporarily restricted from gambling activity;

- ☐ 24 hours
- ☐ 7 days
- ☐ 1 month
- ☐ 3 months

During the self-exclusion period:

- ☐ customer cannot create a new account.
- ☐ customer will not be targeted by any Stake commercial communication on gambling website, products and services.
- ☐ customer will be prohibited from making deposits and placing bets.
- ☐ Withdrawal of winnings and cash balances remains permitted.

7. Account Closure

Stake must make available the option to close their Stake account indefinitely on the platform.

At the account closure period:

- ☐ the customer cannot be prevented from withdrawing the winnings from his/her account, except in cases where the reason for the suspension/blocking prohibits this action
- ☐ may not access their account
- ☐ A customer will be prohibited from making deposits and placing bets

A customer may request to revoke an account closure provided:

- ☐ A period of twenty-four hours has lapsed since the closing of the account
- ☐ The player has made a written request to revoke the account closure

8. Gambling Limits

8.1. Gambling Limits and Restrictions Applied

Stake must provide a customer with the ability of setting a gambling limits on their account across a daily, weekly and / or monthly basis. Gambling limits hereby referred to as:

8.1.1. Loss Limits

Loss limits: Refers to the amounts wagered minus amounts won and reimbursed.

Restrictions applied: Once a loss limit is reached, no further wagers will be permitted on the customer's account.

8.1.2. Deposit Limits

Deposit limits: Refers to the amount a customer can deposit into their gambling account.

Restrictions applied: Once the deposit limit has been reached, no further deposits will be permitted on the customer's account.

8.1.3. Wager Limits

Wager limits: Refers to the net sum of wagers placed during the specified time period.

Restrictions applied: Once the wager limit has been reached, no further wagers will be permitted on the customer's account.

8.2. Setting Simultaneous Limits

Where the customer sets simultaneous periods (e.g., a deposit limit for a day and for a week), the lowest limit must take preference.

8.3. Increasing or Decreasing Limit Duration

A request by the customer to decrease an existing limit must be implemented immediately. A request by the customer to increase the existing limit must take effect after a cool off period of twenty-four hours from the date and time the request is made.

9. Responsible Gambling Intervention Programme

Stake has developed a Responsible Gambling Intervention Programme aimed at identifying customers displaying indicators of gambling harm. Stake must ensure that through educating our customers we yield results that de-escalate behaviour reducing risk of harmful play, ensuring a sustainable environment.

Stake must apply a 4-method approach in the management of risk of gambling harm, involving the following:

- ☐ Identification of at-risk behaviour using behavioural sciences
- ☐ Evaluating risk indicators to detect problem gambling
- ☐ Interventions
- ☐ Evaluation and Efficacy

9.1. Identification of At-risk Behaviour Using Behavioural Sciences

Stake incorporates the use of behavioural sciences and evidence-based research to identify indicators of gambling harm, using the DSM-5 (Diagnostic and statistical manual of mental disorders 5th edition).

Reference: [American Psychiatric Association. \(2013\). Diagnostic and statistical manual of mental disorders \(5th ed.\). Washington, DC: American Psychiatric Association.](#)

Each unique customers data will process through our internal Responsible Gambling Risk Matrix, whereby the customer must meet the minimum risk score to flag for a manual review with our Responsible Gambling Team.

9.2. Evaluating Risk Indicators to Detect Problem Gambling

A range of risk indicators are considered which includes but not limited to:

- ☐ Personal and Account Information
- ☐ Age of customer
- ☐ Age of account
- ☐ Occupation

Deposit Risk Category

- ☐ Assess increase in deposit values / velocity
- ☐ Assess increase in rejected deposit values / velocity
- ☐ Assess overall net deposits (deposits minus withdrawals)
- ☐ Assess number of deposit methods used
- ☐ Assess type of deposit methods used

Communication Risk Category

- ☐ Assess frequency of customer communication initiated by customer

- ☐ Assess content of customer communication (frequent bonus requests, aggressive tone or any other related concerns)
- ☐ Assess existing / disclosed / known vulnerabilities (e.g. health, life events, comorbidities etc.)
- ☐ Assess engagement with previous responsible gambling communication

Wager Risk Category

- ☐ Assess increase in wagering volume / velocity
- ☐ Assess general changes in wagering value / velocity
- ☐ Assess contributing factors to indicators such as chasing wins / losses

Product Risk Category:

- ☐ Assess product risk (e.g. Casino available 24/7)
- ☐ Assess In-play sports betting
- ☐ Assess slot machines play (categorized as instant win games)

Time Spent Risk Category

- ☐ Assess session times / number of sessions
- ☐ Assess time of play (including time of play during anti-social hours)
- ☐ Assess number of days actively playing on daily / weekly / monthly basis
- ☐ Assess general pattern in time of week or month played

9.3. Interventions

Detection of at-risk of gambling harm will be met with written or verbal communication. Stake must determine by assessing the risk indicators, the level of risk that the customer presents.

Methods of communication will be utilized in accordance with the level of risk the customer presents.

9.3.1. Communication Mediums For Interventions

Mediums of communication for interventions include but are not limited to:

- ☐ Emails
- ☐ Phone call
- ☐ Text Messaging

9.3.2. Risk Based Interventions

The following risk level interventions must be applied in accordance with the customers' level of risk presented. In cases whereby a customer is deemed no risk displaying social gambling, no

intervention will be carried out, however the outcome of the assessment will be kept for record keeping and evaluation purposes.

- ☐ **Level 1 – Low Risk:** This must be in the form of an email. The purpose is to educate and grow awareness of the responsible gambling tools.
- ☐ **Level 2 – Low Risk:** This must be in the form of an email. The purpose is to remind the customer of our responsible gambling tools where it is determined necessary to remind the customer.
- ☐ **Level 3 – Medium Risk:** Communication, in the form of an email, will be sent to the customer notifying the customer of the changes in gambling behaviour, strongly suggesting that customer implements responsible gambling tools for effective management of their activity.
- ☐ **Level 4 – High Risk:** This will either be written (email) or verbal communication (telephone call). Stake must contact the customer using the opportunity to understand the specific changes in behaviour, gain understanding as to why the behaviour has changed, whilst ensuring that the customer is well informed of the tools and resources available to adopt sustainable play. Depending on the outcome of the review and interaction, the following actions may be necessary:

- a. Re-instate customers' ability to deposit and wager provided all risks have been addressed
- b. Following an incomplete call or email, remain restricted at the discretion of Stake, prohibiting any further deposits and wagering until all at risk behaviour has been addressed and customer educated on tools
- c. A wager limit may be imposed to better manage customers' gameplay
- d. A deposit limit may be imposed to better manage customers' gameplay
- e. A loss limit may be imposed to better manage customers' gameplay
- f. A self-exclusion may be necessary in the situation where it is determined that further participation in gambling is no longer in the customer's best interest
- g. A cool off period may be necessary in the situation where it is determined that further participation in gambling is no longer in the customers best interest

- ☐ **Level 5:** This may be in the form of verbal communication and in circumstances where verbal communication is not possible, written communication. The purpose is to gain further understanding of the threat relating to a customer at risk of harm (suicide), as a direct result of the statements a customer has made. The customer will be self-excluded by Stake and provided the relevant signposting information of help organizations. Where deemed necessary, Stake may contact local authorities to ensure the safety and wellbeing of the customer.

9.3.3. Activity Restriction

An activity restriction may be implemented if deemed necessary as a result of an intervention subject to the following criteria being met:

- ☐ Level 4 intervention has been initiated
- ☐ The Responsible Gambling Team has deemed it fit to restrict customers documenting the reasons for the restriction, keeping the customer informed of the reasons for the activity restrictions in place

Stake may restrict an account of further activity by prohibiting further:

- ☐ Deposits
- ☐ Wagering across all products

Under activity restrictions, the customer must not be prohibited from:

- ☐ Accessing the account
- ☐ Withdrawing funds from their account
- ☐ Applying a responsible gambling tool

10. Evaluation and Efficacy

Evaluation forms an integral part of measuring the effectiveness in identifying customers at risk of gambling harm.

Stake must ensure that ongoing evaluation is conducted on a quarterly basis, in the following areas:

- ☐ Overall hit rates: Evaluated in accordance with low, medium and high-risk outcomes to establish respective risk rates and how effective we are in identifying customers. Declining hit rates must undergo constant evaluation to improve efficacy and where required, the relevant changes must be implemented
- ☐ Engagement: Measuring engagement rates (open, read rates and successful responsible gambling calls) forms part of the evaluation process. Where it is evident that both medium and / or content are not effective, applicable changes must be implemented.
- ☐ Quality Assurance: Quality assurance will be conducted monthly to assure quality control, identifying areas of development and ensuring that the data we report on remains relevant and in line with responsible gambling objectives.
- ☐ General feedback: Stake must seek feedback from industry partners, the Head of Responsible Gambling responsible for the intervention program, as well as our relevant stakeholders. The lessons will be documented, shared across the business and changes implemented where applicable

11. Training

As part of our regulatory obligations, Stake must provide Responsible Gambling training to all employees. This training ensures that employees understand the risks associated with gambling, the tools available to assist customers, and how to engage appropriately with customers who may be experiencing gambling-related harm.

Our Responsible Gambling training program is structured in four series, ensuring that employees at all levels develop a thorough understanding of responsible gambling principles and best practices.

11.1. Series One – Introductory Training on Gambling Harms

This segment of our training focuses on the fundamental concepts of gambling related harm and is delivered as part of our new hiring process during the staff members induction period.

Employees will be trained in the following topics:

- ☐ Introduction to Problem Gambling
- ☐ Prevalence of Gambling Disorder
- ☐ Risk Indicators
- ☐ Understanding Gambling Myths
- ☐ Vulnerability and risk groups
- ☐ Lived Experienced Video Content
- ☐ Q&A and Assessment

11.2. Series Two – Responsible Gambling Tools

This segment focuses on the practical application of responsible gambling tools. It is specifically designed for employees in customer support, compliance, and responsible gambling roles who interact directly with customers.

Employees will be trained in the functions and use cases of responsible gambling tools, including facilitating the adoption of responsible gambling tools for customers. The tools include but are not limited to:

- ☐ Deposit limits
- ☐ Wager limits
- ☐ Loss limits
- ☐ Activity Alerts
- ☐ Self-exclusion
- ☐ Account Closure

11.3. Series Three – Practical Training

This session is specifically designed for employees in customer support, compliance, and responsible gambling roles who interact directly with customers. The training includes real-life scenarios and role-playing exercises to help employees develop the necessary skills to handle problem gambling contacts effectively.

11.4. Series Four - Specialised Training for Responsible Gambling

Responsible Gambling Analysts operate within a dedicated department tasked with monitoring, evaluating, and intervening in cases of potentially harmful gambling behaviour. To effectively

carry out their role in line with regulatory obligations, all analysts must undergo specialized training.

This training must ensure that the analysts are equipped with the knowledge and tools necessary to:

- ☐ Understand the psychological and behavioural patterns associated with at-risk and problem gambling
- ☐ Interpret player data through an evidence-based lens to support appropriate and timely interventions

11.5. Implementation and Frequency of Training

New employees must receive Responsible Gambling training as part of their induction process. Existing employees participate in refresher training sessions throughout the year, ensuring that their knowledge remains up to date. As part of ongoing best practice, training effectiveness is evaluated regularly, with updates to course content where necessary.

12. Help Organizations

In the event a customer requires further help, there are several organizations that offer professional help free of charge:

Gamblers Anonymous

Website: <https://gamblersanonymous.org/ga/>

Gambling Therapy

Website: <https://www.gamblingtherapy.org/>

Contact: support@gamblingtherapy.org

13. Gambling Blocking Services

Stake understands that prevention of underage gambling works best as a shared responsibility with the minor's parents/guardians and therefore encourages the use of internet filters to reduce the chance of underage gambling at home.

To block minors from accessing gambling sites at home, Stake must make the following information available on our webpage:

- ☐ **Netnanny** offers protective measures which varies from website and app blocks to parental controls.

Website: <https://www.netnanny.com/>

- ☐ **Gamblock** is a mobile app that blocks access to thousands of gambling websites and provides access to useful resources.

Website: <http://www.gamblock.com/>

- **Bet Blocker:** BetBlocker offers the option to install parental controls, allowing you to restrict access to both gambling and other adult content whilst your children are using a device, and deactivate the restriction when you want to browse.

Website: www.betblocker.org

14. Document Management

This document is valid as of date of version recorded. The owner of this document is the Head of Responsible Gaming, responsible for verifying and updating any changes throughout the year where necessary. Each policy should have a clear version number, creation date, and last updated date. This policy must be reviewed annually, or when required to ensure that it remains in line with the applicable laws and regulations.