

Responsible Gaming Policy

GET ZAPPED GAMING NV

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Introduction

Our comprehensive policy document aimed at promoting responsible gaming practices and ensuring a safe and enjoyable gambling experience for all users. This policy represents a significant upgrade to our existing responsible gaming measures, reflecting our commitment to providing a secure and controlled gaming environment.

Scope

The "Responsible Gaming 1.0" policy aims to promote responsible gaming and create a safe gaming environment for all users. It covers:

1. **Deposit and Transaction Limits:** Defined limits for pre and post KYC users to ensure controlled gaming.
2. **User Segregation:** Categorizing users based on performance for tailored support.
3. **Cooling Period:** Preventing impulsive decisions after reducing limits.
4. **Effective Communication:** Timely and relevant communication to educate users about responsible gaming.
5. **Flagging System:** Identifying users with high activity or losses for targeted support.
6. **Tech Requirements:** Outbound calls and handling Break requests efficiently.
7. **Suicidal Thoughts Protocol:** Immediate account blocking and counseling support.
8. **Continuous Improvement:** Dynamic approach to adapt to user needs and industry trends.
9. **Exclusions and Exceptions:** Specific allowances for VIP users and manual approval criteria.

The policy ensures responsible gaming practices, user support, and ongoing enhancement of measures.

Responsibilities

1. **Ops Team:** The ops Team acts as the main contact for addressing manual review requirements of responsible gaming related cases. They assume responsibility for

overseeing the entire process and ensuring timely resolution of these issues, thereby ensuring smooth operations.

2. **Player Relations:** As the frontline team of Zapped Gaming, the Player Relations team plays a vital role in handling customer complaints associated with responsible gaming. They promptly acknowledge these concerns and escalate them to the Ops Team for thorough investigation and subsequent processing, ensuring that customer issues are effectively addressed and resolved.

Procedures

1. Limits:

a. Pre-KYC:

- i. Set Lifetime Deposit Limit and Per Transaction Limit at GBP 2000.
- ii. Allow a maximum of 10 deposits per day with unchanged monthly and weekly logic.
- iii. Users cannot increase any limits until completing the KYC process.
- iv. Users can enable Break even if KYC is not complete.

b. Post-KYC:

- i. After completing the KYC process, the daily deposit limit and per transaction limit will be set at GBP 1000. The daily deposit count will remain the same, allowing a maximum of 10 deposits per day.
 1. Users have the flexibility to increase their per transaction limit at any time, up to the daily deposit limit. This increase will be automatically approved without any cooling period or manual approval process.
 2. Similarly, Users can also increase their daily deposit count up to 13 deposits per day, and this change will be automatically approved without any cooling period or manual approval.
- ii. For calculating the monthly and weekly limits, the following rules will apply:
 1. If the player is a winning player or has an overall loss amount $\geq$ GBP 2000 for the last 3 years, the weekly limit will be calculated as the daily limit multiplied by 7, and the monthly limit will be calculated as the daily limit multiplied by the number of days in a month, for both count and amount.

2. However, if the player's overall loss amount becomes greater than GBP 2000 for the last 3 years, the weekly limit will change to the daily limit multiplied by 6, and the monthly limit will be calculated as 4 times the weekly limit, for both count and amount.

c. Deposit Limit, Cash table limits and OFC table limits of

i. Overall Winning player:

1. For Users falling into this category, there will be no cooling period imposed.
2. All daily deposit limit requests up to a limit of GBP 4000 will be automatically approved. However, if a User requests a daily deposit limit higher than GBP 4000, the request will be submitted for manual approval. Along with the request, an auto-filled declaration form will also be submitted for review.
3. Users have the freedom to increase their per transaction limit at any time, up to their daily deposit limit. Such increases will be automatically approved without any cooling period or manual approval process.
4. Similarly, Users can increase their daily deposit count up to a maximum of 13 deposits per day, and these requests will be automatically approved. There is no cooling period or manual approval required for these requests. However, if a User requests a daily deposit count higher than 13, the request will not be submitted for approval.
5. Monthly and weekly logic should be $\text{weekly} = \text{daily} \times 7$ and $\text{monthly} = \text{daily} \times \text{number of days in a month}$ for count and amount both. Requests will be auto approved or will be submitted for manual approval as per daily deposit limit logics. For example: User has daily deposit limit of GBP 4000, then his weekly deposit limit request up to $\text{GBP } 4000 \times 7 = \text{GBP } 28000$ will be auto approved and weekly deposit limit request $> \text{GBP } 28000$ will be submitted for manual approval along with an auto filled declaration form.

ii. Overall losing with loss amount $\leq$ GBP 2000 for the last 3 years:

1. For Users in this category, no cooling period will be implemented.
2. Daily deposit limit requests up to and including GBP 1000 will be automatically approved. However, if a User requests a daily deposit limit higher than GBP 1000, the request will be subjected to manual checks. Along with the request, an auto-filled declaration form will also be submitted for review.

3. Users have the flexibility to increase their per transaction limit at any time, up to their daily deposit limit. Such increases will be automatically approved without any cooling period or manual approval process.
4. Similarly, Users can increase their daily deposit count up to a maximum of 13 deposits per day, and these requests will be automatically approved. There is no cooling period or manual approval required for these requests. However, if a User requests a daily deposit count higher than 13, the request will not be submitted for approval.
5. Monthly and weekly logic should be $\text{weekly} = \text{daily} \times 7$ and $\text{monthly} = \text{daily} \times \text{number of days in a month}$ for count and amount both. Requests will be auto approved or will be submitted for manual approval as per daily deposit limit logics.

iii. **Overall losing with loss amount > GBP 2000 for the last 3 years:**

1. The cooling period for deposit limits will be set at 7 days. During this period, Users will not be able to increase their deposit limit.
2. When a User requests a daily deposit limit increase, the request will be submitted along with an auto-filled declaration form for review and verification.
3. Users will have the ability to increase their per transaction limit at any time, up to their daily deposit limit. Such increases will be automatically approved without any cooling period or manual approval logic.
4. Similarly, Users can increase their daily deposit count up to a maximum of 13 deposits per day, and these requests will be automatically approved. However, any daily deposit count request exceeding 13 will not be submitted.
5. Monthly and weekly logic would remain same as $\text{weekly} = \text{daily} \times 6$ and $\text{monthly} = 4 \times \text{weekly}$ for count and amount both. Requests will be submitted for manual approval along with an auto filled declaration form.
6. This approach provides flexibility and ease of use for Users within the specified limits, while still maintaining some level of control and review for higher deposit limits.

2. User Segregation:

- a. Categorize users into the following groups based on their overall performance:
 - i. Overall Winning Players.

- ii. Overall Losing with Loss $\leq$ GBP 2000 for the last 3 years.
- iii. Overall Losing with Loss $>$ GBP 2000 for the last 3 years.

3. Cooling Period:

- a. Users who reduce their deposit limits can activate the cooling period.
- b. During the cooling period, users cannot increase their deposit limit.
- c. Cooling periods for deposit limits and cash/OFC tables work independently.
- d. Different cooling periods for different user categories.

4. Communication:

- a. Users receive two pop-up messages for reconfirmation when applying for a Break or decreasing any limit
- b. Users receive an email for every front-end or back-end action they perform.
- c. Users receive a pop-up message and email notification for automatically approved requests.
- d. For requests requiring review and approval, users receive email and push messages with a targeted response time.
- e. Users receive email and push notification when a Break is automatically removed.

5. Responsible Gaming Communication Strategies:

- a. We will send a welcome email to all new users within their first week of joining. This email serves as an introduction to responsible gaming principles and highlights the key features available to promote a safe and enjoyable gambling experience. We aim to educate and inform new users about responsible gaming practices, ensuring they are aware of the tools and resources at their disposal to maintain control and make informed decisions while using our platform.
- b. **High Gaming Activity:**
 - i. The team will analyse users with high gaming activity, spending more than 5 hours in a day for more than 3 days, and losing more than GBP 1000 in a month.
 - ii. Analysis on the user will be conducted as defined in point 8.b
 - iii. In this communication, we will address the user's high gaming activity and provide important guidelines and recommendations for maintaining a healthy gaming

balance. We will emphasize the importance of taking breaks, managing screen time, and engaging in other activities to ensure overall well-being.

- iv. The communication will include a "do's and don'ts" section specifically tailored to the situation, offering practical advice on responsible gaming habits. This will be accompanied by our regular responsible gaming email, which provides general guidelines and access to support resources.

c. Flag condition for Big users:

- i. Formula: $\text{If lost balance} \geq 0.5 \text{ and } \text{Balance (7 days ago)} - \text{balance (today)} - \text{withdrawal (last 7 days)} + \text{deposit (last 7 days)} \geq \text{GBP } 1000$

where lost balance = $(\text{Balance D7 (7 days back)} - \text{Balance D0 (today)} - \text{W/D in last (7 days)} + \text{Dep in last (7 days)}) / (\text{Balance D7 (7 days back)} + \text{Dep in last (7 days)} - \text{W/D in last (7 days)})$.

- ii. Four emails will be sent to the user within a span of one week, followed by a quarterly email to such users

d. Flag condition for Small & Mid users:

- i. Formula: $(\text{Balance (30 days ago)} - \text{balance (today)} - \text{withdrawal (last 30 days)} + \text{deposit (last 30 days)}) / (\text{Balance 30 days ago} + \text{Deposit}) > 0.5$ then If (last week deposit count ≥ 25 and Total Loss 5K till 99999 (in last 7 days) and $(\text{Balance (7 days ago)} - \text{balance (today)} - \text{withdrawal (last 7 days)} + \text{deposit (last 7 days)}) / (\text{Balance 7 days ago} + \text{Deposit}) > 0.5$) Users coming under this flags will be sent 4 email reminders within
- ii. Four emails will be sent to the user within a span of one week, followed by a quarterly email to such users

e. Flag condition Players losing GBP 10,000 in one month.

- i. The first thing to check is the total deposits and withdrawals made in one month, which resulted in a loss of GBP 10,000.
- ii. The loss amount is calculated as follows: $\text{Loss Amount} = \text{Opening Balance on the 1st of every month (excluding RCB)} + \text{Deposit amount in the month} - \text{Total}$

withdrawal amount in the month (regular + commission) - Closing balance on the 31st of every month (excluding RCB).

- iii. For loss% calculation: $(\text{Balance 1 (1st of every month)} - \text{Balance D31 (31st of every month)} - \text{Total Withdrawal in a month} + \text{Total Dep in a month}) / (\text{Balance 1 (1st of every month)} + \text{Total Dep in a month} - \text{Total Withdrawal in a month})$.
- iv. We will make a check-up call to the user, informing them about their current total loss on the website. We will also inform them about our Responsible Gaming tool, which can help them manage their bankroll and stakes.
- v. Additionally, we will let them know about our counselor and offer them a session if needed. If the user is affected, we will take action as mentioned in the important points.

f. Flag-8 Lifetime Loss

- i. For users who have experienced losses $\geq$ GBP 20,000 in lifetime, we will implement a flagging system
- ii. Communication
 - 1. Responsible gaming + Reduce limits (deposit) + Break Reminder
 - 2. Call trigger will be activated for one player for one instances
- iii. The language of the email will be informative, emphasizing the importance of responsible gaming practices and inviting the user to utilize the available features to ensure a safe and balanced gaming experience.

g. Communication to users with high gaming activity to encourage breaks and responsible habits.

h. Regular communication for users with high losses, providing guidelines for responsible gaming practices.

6. Handling Self Harm or Actions:

- a.** To ensure user safety, we will immediately block the user's account or deposit will be set to zero on a case-by-case basis.
- b.** Suggest therapy sessions to the user, provided by a dedicated team of counselors and psychologists.

- c. If the user wishes to unblock their account and claims to be fine, they should be redirected to the Responsible Gaming team.
- d. The Responsible Gaming team will contact the user and assess their emotional well-being.
- e. The team must ensure that the user has attended therapy sessions with the dedicated team of counselors and psychologists.
- f. The team will receive feedback from the counselors and psychologists regarding the user's progress and mental state.
- g. Once positive feedback is received from the counselors and psychologists regarding the user's well-being, a written declaration will be obtained from the user, acknowledging their understanding of the risks associated with the game (Refer 8.b).
- h. After successfully verifying the user's declaration, the team can proceed to unblock or increase the limit on the user's account.

7. Handling User Complaints on RNG:

- a. The team will analyse the user's profile "deposit /withdrawal & game play pattern".
- b. If we identify a concerning pattern of gameplay, they may reduce the user's deposit limit or apply Break.
- c. Additionally, the team will inform the user about our Responsible Gaming policy via email and get a written declaration from the user (Refer 8.a)
- d. If the same user comes back again and again, complaining about the RNG, such a user should be temporarily blocked and follow the process mentioned from a to c.

8. Handling User Requests to Increase Limits:

- a. The team reduced the deposit limit to zero "0" limit of any user & now the user wants to increase it.
- b. Analyze the user's gameplay pattern and improvement.
 - i. Constant Play Pattern: If the user maintains a consistent play pattern, it may indicate that they are following a specific strategy or have a preferred gaming style. Consistency in their approach could lead to potential improvement in their gameplay over time.

- ii. **Sudden Low or Uneven Amount Deposits:** Irregular deposit patterns that do not align with the user's usual behavior may indicate financial instability or impulsive behavior. This could potentially affect the user's ability to bear the risk associated with gambling, especially if the deposits are beyond their usual profile.
 - iii. **Age of the User:** Considering the user's age is essential for determining their level of financial maturity and risk tolerance. Younger users may have a higher risk appetite, while older users might prefer a more conservative approach.
 - iv. **Time Spent on the Platform:** Understanding whether the user is a new or long-standing customer can provide insights into their familiarity with the platform and their experience in online gaming. Long-term customers might have developed better skills and strategies compared to newcomers.
 - v. **High Use of Credit Card or Sudden Credit Card Use:** A sudden increase in credit card usage or heavy reliance on credit cards for deposits could be a potential red flag. It may indicate that the user is gambling with borrowed money, leading to financial risks.
 - vi. **Responsible Gambling (RG) Check: Past Actions Related to Limits, Cooling Period, and Break:** Reviewing the user's history with respect to imposing limits, opting for cooling periods, or taking Breaks can give valuable insights into their self-awareness and responsible gambling behavior.
- c. If the user has improved his gameplay, we ask him to take a session and seek counselor advice. Then we determine whether we can increase his limit or not.
 - d. These step-by-step procedures ensure responsible gaming practices, user support, and effective communication to promote a safe and controlled gaming environment.

9. Process of Handling Remove or Reduce Break Request

- a. If the user has applied for a Break. The needs to submit the request along with an auto-filled declaration form and completed OTP verification.
- b. The request will be forwarded to the responsible gaming team for assessment of the user's gaming pattern. Based on the assessment, the team will either approve

or reject the Break request. In some cases, the team may approve the request with a reduced limit.

- c. When considering the assessment of a user's request to remove their Break, several factors should be taken into account. These factors include the user's deposit pattern, game play pattern, number of Breaks previously applied by the user, and the amount lost. By analyzing these factors, we can better understand the reasons the user might provide for requesting the removal of their Break.
 - i. Deposit Pattern: The user's deposit pattern plays a crucial role in determining their reasons for wanting to remove the Break. If the user has been consistently making deposits over a period of time, they may argue that they have regained control over their online gaming habits and are confident in their ability to play responsibly.
 - ii. Game Play Pattern: Analyzing the user's game play pattern can provide insights into their motivations for removing the Break. If the user has been demonstrating responsible and controlled behavior during their recent gameplay sessions, they might argue that they have learned from their past mistakes and are ready to participate in online games without the need for a break.
 - iii. Number of Breaks: Considering the number of Breaks the user has taken in the past is essential. If the user has previously applied multiple breaks and successfully adhered to them, they could assert that they have already had sufficient time away from the game and have developed a more responsible approach to their gambling habits.
 - iv. Lost Amount: cases of high lost amounts in the game, it is important to request confirmation from the user regarding the source of funds used. The user should provide written confirmation via email or engage in a recorded phone call, ensuring that the amount does not originate from savings, loans, or any other restricted sources. This verification process helps establish transparency and safeguards against potential financial risks for the user.
- d. If the responsible gaming team has applied the Break for the user. The limit has been reduced, and there is no option for the user to increase the deposit.

- e. The user will get the option to increase the deposit limit, if the user has submitted the request along with an auto-filled declaration form, with OTP verification and the same has been manually approved by the responsible gaming team
- f. Break, when enabled by the user, can only be disabled once in a lifetime in case the user has done it by mistake. To disable it, the user needs to share a declaration form sent by us, stating the reason for the request. We make exceptions 2-3 times for VIP users as well.