

Responsible Gaming policy

Gareton B.V.

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Article 1: Introduction

1.1 Purpose

The Responsible Gaming Policy serves as a framework to ensure that gambling activities are conducted in a manner that prioritizes the well-being of all stakeholders involved, including players, staff, affiliates, and partners. The main goal is to encourage and promote safe, responsible, and enjoyable gambling experiences for players while actively addressing and mitigating the risks associated with problem gambling.

The policy is designed to create an environment where players are informed about the potential risks of gambling and are provided with the necessary tools and support to make informed decisions regarding their gambling behaviour. This includes establishing mechanisms to help individuals who may be at risk of developing gambling problems.

This Responsible Gaming Policy specifically aligns with the regulations and guidelines set forth by the Curaçao Gaming Authority under the LOK standards. As part of this alignment, the policy ensures compliance with local regulatory requirements aimed at protecting players, maintaining fairness in the gaming environment, and promoting responsible practices in the online gaming industry.

The policy applies to all players, staff members, affiliates, and partners involved with the Gareton B.V., meaning that everyone within the scope of the gaming operations has a shared responsibility in upholding the principles of responsible gambling. It also emphasizes a commitment to cooperation with regulatory authorities and other industry stakeholders to continuously improve and evolve responsible gaming practices.

The policy is designed to reduce the risk of problem gambling, prevent underage gambling, and offer support and assistance to those who may need it. It also establishes procedures for identifying signs of problem gambling behaviour, setting limits on gambling activity, and providing self-exclusion options to protect vulnerable individuals.

1.2 Scope

This Responsible Gaming Policy applies to all gambling and gaming activities that are conducted under the official license OGL/2024/165/0185, issued by the Curaçao Gaming Control Board. This license ensures that the gaming activities meet the necessary legal and regulatory standards set by the governing authority in Curaçao. Therefore, any gaming operation that falls under this license must adhere to the rules and guidelines outlined in this policy.

The policy is binding for a wide range of individuals and entities involved in the gaming operations. This includes all employees working within the organization, who are expected to follow the policy's guidelines and contribute to maintaining a responsible gaming environment. It also applies to marketing partners who promote or advertise the gaming services, ensuring that they comply with the responsible gaming practices when interacting with customers.

In addition, the policy covers all other stakeholders involved in the gaming operations. This may include third-party vendors, affiliates, service providers, and anyone else with a direct or indirect role in delivering gaming services. By extending the policy's coverage to all these

groups, it ensures that every party engaged in the gaming business shares the responsibility for promoting safe and responsible gambling practices.

Ultimately, the scope of this policy ensures a unified approach to responsible gaming, ensuring that all parties involved in the operation of the gaming platform are aligned in their commitment to player protection, regulatory compliance, and the promotion of a healthy gambling environment.

1.3 Commitment to Responsible Gaming

We are fully committed to ensuring that gambling remains a safe and enjoyable form of entertainment for all players. We understand the potential risks involved and the importance of fostering an environment where players can enjoy their gaming experience responsibly and without harm.

To achieve this, we have implemented a comprehensive set of mandatory measures designed to protect vulnerable players. These include setting limits on gambling activity, offering self-exclusion options, and providing tools to help players monitor and control their spending. We are dedicated to supporting individuals at risk of developing problem gambling behaviours by offering resources and promoting responsible gambling practices at all times.

Additionally, we ensure that all our staff members receive ongoing training on responsible gaming practices. This training equips them to recognize the signs of problem gambling and to provide appropriate support to players in need. By keeping our team well-informed and up to date on industry best practices, we are better prepared to address any concerns or challenges related to responsible gambling.

We are also committed to regularly reviewing our Responsible Gaming Policy and procedures to ensure they remain effective and relevant in light of evolving risks and changing regulations. As gambling laws and industry standards continue to evolve, we remain dedicated to adapting our policies to comply with the latest regulations, ensuring continuous protection for players and maintaining a safe, secure gambling environment.

Article 2: Age Verification & Underage Gambling Prevention

2.1 Legal Age Restriction

Gambling is strictly prohibited for individuals who are under the age of 18 years old. This policy is in place to ensure that only persons who reached 18 years are allowed to gamble.

The age restriction serves to protect minors from the potential harms associated with gambling and to ensure that gambling remains a responsible form of entertainment for adults who are capable of making informed decisions. We are fully committed to prevent underage gambling and take all necessary measures to verify the age of players during the registration process.

2.2 Age Verification Procedures

To ensure compliance with the legal age restrictions for gambling, we have established strict age verification procedures. These procedures are designed to verify the identity and age of all players before they are allowed to participate in any gambling activities.

Upon registration, players will be required to provide mandatory identity documents, such as a valid ID card, passport, or driver's license. These documents are used to confirm that the individual meets the minimum legal age requirement to gamble.

In addition to manual identity verification, we may also use AI-based checks or consult third-party databases to further validate a player's age.

If an account is flagged as potentially underage or if there is any suspicion that a player may not meet the required age, the account will be immediately suspended. The company will investigate the matter, and if the player is found to be underage, the account will be permanently closed. Any winnings earned by the underage player will be forfeited, as per the applicable regulations, and deposits refunded.

2.3 Consequences for Underage Gambling

We enforce a strict zero-tolerance policy toward underage gambling. If a player is found to be under the legal gambling age, the following consequences will apply:

1. Refund of Deposits – Any deposits made by the underage individual will be fully refunded, except in cases where funds are frozen under AML policies or if fraudulent activity is suspected. This ensures that minors do not suffer financial loss while preventing potential misuse of funds.
2. Forfeiture of Winnings – Any winnings accumulated by an underage player will be automatically forfeited. This rule is in place to discourage attempts by minors to participate in gambling activities and to comply with regulatory requirements that prohibit underage individuals from benefiting from gambling.
3. Regulatory Reporting – A detailed report of the incident will be prepared and submitted to the Curaçao Gaming Authority within five working days. This report will include:
 - a. The nature of the breach (how the underage gambling was detected).
 - b. The steps taken to identify and block the underage account.
4. The corrective measures implemented to prevent similar incidents in the future.

Article 3: Player Protection & Responsible Gambling Tools

3.1 Access to Responsible Gambling Information

The Responsible Gaming Policy is displayed across the gaming platform to ensure that all players are informed about their rights and responsibilities. This makes it easy for players to access important information about responsible gambling whenever they need it.

1. Display Across Platform – The Responsible Gaming Policy will be visible and accessible in the following areas:
 - a. The homepage of a gaming website and/or application.
 - b. The Terms & Conditions section, where players agree to the rules and policies before engaging in gambling activities.
 - c. The footer of the gaming site and app, ensuring it is available on every page for quick reference.
2. Immediate Access to Responsible Gaming Tools – Players will have easy access to a variety of responsible gaming tools designed to help them manage their gambling behaviour. These tools include:
 - a. Deposit Limit, which helps players control how much money they can deposit.
 - b. Wagering Limit, which allows players to set a cap on how much they can bet.
 - c. Loss Limit, to control the amount of money they are willing to lose.
 - d. Session Limit, helping players manage the amount of time they spend gambling.
 - e. Cooling-Off Period, allowing players to take a temporary break from gambling.
 - f. Self-Exclusion, which enables players to permanently or temporarily exclude themselves from gambling activities.
 - g. Reality Check, providing reminders about their gaming duration to help them stay aware of their time spent playing.

3.2 Self-Assessment Tools

To assist players in evaluating their gambling habits, we provide self-assessment tools, such as the GamCare Test and the CAGE Questionnaire. These tools are designed to help players recognize signs of problematic gambling behaviour and take the necessary steps to address it.

The CAGE Questionnaire

Players are encouraged to answer the following questions honestly:

- C – Cut Down: Have you ever felt you should cut down on your gambling?
- A – Annoyed: Have people ever annoyed you by criticizing your gambling habits?
- G – Guilty: Have you ever felt guilty about your gambling?
- E – Eye-Opener: Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be necessary.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

If any concerning behaviour is identified through the self-assessment, it is necessary to recommend that the player explore the responsible gambling tools available.

As part of our commitment to promoting responsible gambling, we ensure that customer support staff are trained to detect signs of concerning behaviour in player interactions. If any concerning verbal behaviour is detected during a chat session, the support team will ask the player the following PG Quiz questions to assess whether the player may be experiencing gambling-related issues:

- Have you ever gambled to get money so you can pay debts?
- Has your gambling made you careless about the welfare of yourself or your family?
- Have you ever borrowed money or sold anything to gamble?
- Has your gambling ever caused you any health problems?
- Have you ever felt extremely guilty after finishing a gambling session?
- Have you ever felt you might have a problem with gambling?

These questions are designed to help identify early warning signs of problematic gambling behaviour. Based on the responses, customer support will provide appropriate guidance, recommend available responsible gambling tools, and direct the player to professional help or support organizations, if necessary.

Article 4: Cooling-Off & Self-Exclusion

4.1 Cooling-Off Periods

We recognize the importance of responsible gambling and provide players with the option to take a break from gambling activities, including both gaming and sports betting. Players can initiate a Cooling-Off Period for the following durations:

- 1 day
- 3 days
- 1 week
- 1 month
- 3 months
- 6 months

The Cooling-Off Period is an immediate action that can be activated by the player and does not require any approval. During this period, player won't be able to make deposits and play

during the specified period, also the user will be excluded from all marketing communication. This feature is available to all players who wish to take a short-term break. Players are encouraged to use this option if they feel they need time away from gambling to reassess their behaviour.

4.2 Self-Exclusion Process

We offer players the option of self-exclusion to help individuals take a more extended break from gambling activities, including both gaming and sports betting.

Self-Exclusion is a voluntary process in which a player temporarily or permanently blocks themselves from accessing gambling services, including gaming and sports betting.

Players can choose to self-exclude for the following durations:

- 1 year
- 3 years
- Permanent

Self-exclusion applies to all brands and domains operated by Gareton B.V., meaning that once self-exclusion is activated, the player will be unable to access any of the company's gaming platform, including both online gaming and sports betting sites.

To ensure that the self-exclusion process is effective and cannot be circumvented, duplicate accounts and known payment methods will be blocked. This prevents players from creating new accounts or using known payment methods to bypass their self-exclusion.

4.3 Post-Exclusion Reactivation

Once the self-exclusion period has ended, players who wish to reactivate their account must follow a clear process to ensure responsible gambling practices are maintained:

1. **Submit a Written Request:** The player must submit a formal written request to re-enable their account. This ensures that the decision to return to gambling is deliberate and considered.
2. **Acknowledge Responsible Gaming Reminders:** Upon reactivation, the player must acknowledge and review responsible gaming reminders. These reminders serve to highlight the importance of safe and controlled gambling practices.
3. **Complete a Self-Assessment:** Before resuming play, the player must complete a self-assessment, such as the CAGE Questionnaire or a similar responsible gambling questionnaires, to evaluate their current gambling behaviour and ensure they are fit to return to gambling.

Article 5: Deposit Limits & Financial Management

5.1 Deposit & Wagering Limits

Players have the option to set daily, weekly, or monthly deposit and wagering limits to manage their gambling activity, including on both gaming and sports betting platform. These limits help players maintain control over their spending and ensure responsible gambling practices.

- **Deposit Limits:** Players can set limits on the amount they deposit into their accounts within a specified period (daily, weekly, or monthly).
- **Wagering Limits:** Players may also set limits on the amount they are willing to wager. Please note, that wagering limits do not apply to sports betting.

Limit Adjustments:

- Any decrease in limits will take effect immediately, allowing players to reduce their gambling activity promptly.
- Increase requests for limits will be subject to a 7-day waiting period, giving players time to reconsider before increasing their spending limits.

5.2 Other Limits

Players can also set the following limits to manage their gambling behaviour (Inapplicable for Sports betting):

- **Loss Limits:** Players can establish limits on the total amount they are willing to lose within a specified period (daily, weekly, or monthly). Once the set limit is reached, further gambling activity will be restricted until the next period begins.
- **Session Time Limits:** Players can set a limit on the amount of time they wish to spend on gambling activities during each session. This helps to ensure players take regular breaks and maintain control over their gambling duration.

Article 6: Player Behaviour Monitoring & Early Detection

6.1 Behaviour Tracking

We employ a Responsible Gaming Risk Scoring system to monitor and assess players' gambling behaviour over time. This system is designed to identify any potential signs of problem gambling by analyzing a variety of factors related to a player's gaming habits.

The risk scoring process does not rely on a single factor but considers multiple aspects of behaviour to provide a comprehensive view of the player's gambling habits. This helps to

ensure that players receive the support they need, whether through responsible gaming tools or other interventions.

6.2 Intervention Procedures

If concerning behaviour is detected, the player will be contacted. Based on the level of risk identified, possible actions may include: providing responsible gaming resources, setting deposit limits, temporarily suspending the player's account, or initiating self-exclusion if necessary. These measures are implemented to support the player's well-being and ensure responsible gambling practices are maintained.

Article 7: Marketing & Advertising Compliance

7.1 Prohibited Advertising Practices

The following advertising practices are strictly prohibited:

- **Misleading Claims about Winning:** No advertisements or marketing materials may make false or misleading claims regarding the likelihood of winning or guaranteed outcomes in gambling activities.
- **Marketing to Self-Excluded Players:** Advertising efforts must not target or reach individuals who are self-excluded from gambling, in any form of promotional material.
- **Marketing to Individuals Under 25 for High-Risk Casino Games:** High-risk casino games should not be marketed to individuals under the age of 25, ensuring that gambling promotions are directed only at those who are legally permitted to engage in such activities.
- **Marketing to Financially Vulnerable Individuals:** Advertising must not be directed at individuals who may be financially vulnerable, including those who are at risk of or have been identified as having financial difficulties.

7.2 Affiliate & Influencer Compliance

All marketing partners must comply with the advertising guidelines set forth by the Curaçao Gaming Authority. The following practices are strictly prohibited in all marketing materials:

- **Use of Minors or Child-Friendly Characters:** Marketing should not include minors or child-friendly characters, ensuring that promotional content does not appeal to underage audiences.
- **Sexualized Content:** Advertising must not contain sexualized content, imagery, or messages that could be seen as inappropriate or offensive to the public.
- **Gambling as a Financial Solution:** Promotions must not suggest or imply that gambling is a legitimate means of financial gain or solving financial problems.

Advertising must maintain ethical standards and avoid misleading or harmful messaging.

Article 8: Staff Training & Internal Compliance

8.1 Employee & Customer Support Training

It is essential that all staff, especially customer support and VIP team as well as Responsible Gambling team, are equipped with the knowledge and skills to recognize signs of gambling addiction and to provide appropriate assistance when necessary. To ensure a comprehensive understanding of responsible gambling practices, all employees undergo regular Responsible Gaming training.

Training Approach:

- **Internal Resources:** Our internal training programs do cover responsible gambling policies, identification of problem gambling behaviours, and the tools available to support players.
- **External Resources:** We also collaborate with external experts and organizations specializing in responsible gambling and financial support to provide employees with the latest industry knowledge and best practices.

8.2 Responsible Gaming Team

A dedicated Responsible Gaming team is responsible for overseeing the implementation and adherence to the Responsible Gaming Policy. This team ensures that all responsible gaming practices are properly executed, maintained, and updated as necessary.

As part of their duties, the RG team conducts an annual review of the Responsible Gaming Policy to ensure its effectiveness and compliance with all the regulations. A comprehensive report on the policy's status and any updates will be presented to executive management. In the event of any changes to the policy, a report will also be submitted to the Curaçao Gaming Authority in accordance with regulatory requirements.

Article 9: Incident Reporting & Regulatory Compliance

9.1 Incident Reporting to CGA

In the event that an underage player or a self-excluded individual gains access to the platform, the following actions will be taken immediately:

1. The account will be blocked to prevent further gambling activity.
2. All deposits made by the individual will be refunded within two business days.
3. A detailed incident report outlining the circumstances and actions taken will be submitted to the Curaçao Gaming Authority within 5 working days.

9.2 Audit & Compliance Checks

Records of all exclusions, age verifications, and interventions related to responsible gaming are securely maintained for a period of 7 years.

The Curaçao Gaming Authority reserves the right to request compliance audits at any time to ensure that all regulatory requirements are being met and that responsible gaming standards are being upheld effectively.

Article 10: Policy Review & Amendments

10.1 Ongoing Review

This policy will undergo an annual review to assess its effectiveness and ensure it remains aligned with current regulations and industry best practices. Any changes or updates to the policy will be submitted to the Curaçao Gaming Authority for approval to maintain compliance with regulatory requirements.