

Ngame NV

Responsible Gambling Policy
(Curacao)

Version 1.0

Document Status

Version Number	V1.0
Status	Active
Authorisation and approved by	Head of Operations
Review	19.03.2025
Owner	Ngame NV
Number of pages	12
Change History	N/A

Version Control

Effective date	Version	Comments	Owner
19.03.2025	1.0	Full new policy draft	Aroa Scheper

Scope

The purpose of the Responsible Gambling Policy ("RG Policy", "the Policy" or "This Policy") document is to set out the Ngame NV group policy in relation to the creation of safe environment for the customers, establishing several controls, checks and tools to protect those who can be at risk at gambling. The Policy also encourages staff to treat responsible gambling as a priority and to act accordingly. The policy applies to all employees.

Responsibility and Authority

It is the responsibility of the Head of Operations to review this document and amend it where necessary.

Control and Distribution

This is a controlled document and can only be updated by the authorized information management representative and must include a revision status and traceability of the change process.

1. Introduction

Gambling can be an enjoyable leisure and entertaining activity. Generally, people enjoy gaming in a safe, fun, and controlled way as another facet of their leisure activities. However, in some cases and for some customers, gambling can have a negative impact on multiple areas of their lives. Ngame is therefore compromised with the prevention and counteraction of gambling related harm and fully aware that behind the statistics there are real situations that affect people socially, psychologically and financially. In Ngame NV it is essential to support these customers by promoting a culture of Responsible and Safe Gaming that encourages a good practice of this activity, offering different tools for players to protect themselves, providing the elements needed to detect and evaluate possible problematic behaviors and applying the necessary action plan.

2. Policy Review

The departments responsible for designing, monitoring and updating these internal controls are the Head of Operations and the RG Manager. The policy will be reviewed regularly by the above mentioned, at minimum:

- ❖ Annually: no later than 12 months from the date upon which the Policy was last reviewed;
- ❖ Upon the change of any relevant law or regulation which applies to the Policy;
- ❖ Upon the finding by any regulator, external or internal audit that an amendment to the Policy is required;
- ❖ Whenever significant changes occur in the business, that will have a direct or indirect impact on the area this document concerns

Any amendment of the Policy shall, as soon as is reasonably practicable, be distributed or informed to all persons within the scope of the Policy for information of the amendment. Any change in Policy giving rise to a procedure review shall be identified and such changes shall be implemented to the relevant Procedure.

3. Core Values

Ngame NV is committed to the duty of care towards our customers, which includes ensuring that social and health considerations are taken into account in the gambling operations in order to protect players against excessive gambling, and help them to reduce their gambling when there is reason to do so. We strive to provide a high level of player protection, promote responsible gambling and inform our customers on the options available for them to maintain their gambling as a form of entertainment within control. Responsible gambling (“RG”) is a core pillar in our operation and we understand the impact gambling addiction can have on the affected individuals, but also friends, family, colleagues as well as on a larger scale to society as a whole. Gambling addiction can result in broken relationships, debts and even crime which is why for Ngame NV it is of utmost importance that gambling operators play their part by following applicable regulation and setting out the best practice in the industry.

3.1 Protection of vulnerable customers

Whilst a majority of players are able to enjoy gambling within the limits of their control, there are groups of individuals that can be considered more vulnerable to suffering negative consequences related to gambling. Ngame NV takes into consideration vulnerability factors along the identification, risk assessment and action plan phase in order to prevent and mitigate the risks related to gambling.

3.2. Protection of Minors

Underaged gambling is prohibited under law, and we do not allow individuals under 18 to register an account in order to play our games. We have various technical solutions and processes in place in order to prevent minors from accessing gambling on our site, and to make sure our marketing does not appeal to any minor.

3.3 No Provision of Credit

In line with our license obligations, and in order to prevent players from gambling outside of their means, the provision of credit, whether directly or indirectly, is strictly prohibited under this policy. We do not provide any players with credit, via our site or otherwise and do not allow for any peer-to-peer transfers of funds between player accounts.

4. Responsible Marketing

Ngame NV aims for a high standard of our marketing initiatives and comply with current legislation on marketing and further requirements set out in the jurisdictions we operate in. We always formulate our marketing with fairness and transparency in mind, and make sure to avoid any misleading or aggressive marketing.

All marketing assets adhere to a strict review process, before publishing any marketing material, where socially responsible considerations are taken into account during the evaluation in line with our license requirements, our internal guidelines for Socially responsible marketing and our commitment to our Duty of Care.

Wherever possible, we make sure to utilize available means to “age-gate”; to limit the audience and avoid marketing material being seen by minors or younger individuals.

In addition, if a player has closed their player account, Marketing material may only be addressed directly to the player if the player actively approved this in connection with the account closure.

Ngame NV filters all direct marketing to make sure that self-excluded customers, individuals considered at-risk in our system and/or players that have unsubscribed from marketing are not included.

5. Product and Design

Ngame NV only contracts with reputable game providers where we can assure the fairness and suitability of the randomness of games. We take care to promote our games in a responsible manner and will not include games with child appealing imagery in our promotional material. Ngame NV does not specifically design or program a game so that players are given the impression of being close to winning when such is not the case.

We do not provide free games, trial games or similar games that have a random outcome different from the corresponding game when played with a wager.

When designing our product and new implementations, high social responsibility considerations are taken into account before its application.

6. Employees and training

Ngame NV does not employ any individuals under 18, and will request necessary due diligence in order to verify identity and age prior to employment. All staff will undergo responsible gambling awareness training, to ensure the obligations pertaining to this area are understood throughout the business. Training is adapted to the role and responsibilities of an employee, and we have therefore set out different training programs depending on the department.

6.1 Customer-oriented staff

Employees who are responsible for dealing with responsible gaming-related matters, and for player interaction in general, will be properly and routinely trained in the relevant responsible gaming procedures. These teams are well aware of their responsible gambling responsibilities, as they are often the first to notice at-risk behaviors in customer activity and need the resources in order to address this immediately.

The employees will be trained to look out for players demonstrating signs of agitation, distress, intimidation, aggression, and, or any other behavior which may be the result of a gambling problem.

Our customer service team is available at all times for customers that require assistance in relation to their gambling. For additional support our specialized RG officers will step in and assist a player with advice or guidance on safer gambling.

6.2 Specialized RG employees

We understand the importance of having specialized staff for responsible gambling, and have dedicated staff particularly suited to handle more sensitive player queries regarding gambling problems. This function also monitors the activity of players, conducts risk assessments of player accounts and sets out an action plan for a player depending on the risk profile.

Ngame NV keeps a record of the employees, or the department of employees, who are responsible for initiating player interaction, and who are required to complete the relevant responsible gaming training.

6.3 Directors supervision

MRLO, Head of Operations and some other directors keep abreast of regulatory changes, and communicate new regulation as well as changes to current regulation to the business to ensure the business meets its license obligations relevant to responsible gambling. The compliance team also functions as an additional line of defense and regularly reviews the Responsible gambling processes and practices within the company.

7. Player protection system

Ngame NV fully understands the inherent risks of addiction attached to gambling which is why our responsibility as a gambling operator is to secure a high level of prevention and player protection. In order to do so, Ngame NV has set up a customer interaction process to be able to identify and take appropriate actions where the risk for problematic gambling is detected in a customer account or activity. Customer Interaction is defined as the obligation for licensees to interact with customers and evaluate those interactions in a way which minimizes the risk of customers experiencing harms associated with gambling.

The customer interaction process includes:

- 1) **Identify** customers who may be at risk of or experiencing harms associated with gambling.

Ngame NV employs effective measures and processes to detect and identify problem gambling, and actions and, or behavior which might be indicative that a player is at risk of developing gambling problems, using analytical tools and, or behavior monitoring systems and customer facing and, or responsible gaming staff.

The criteria to do so includes the following;

Communication (at risk behavior)

- ❖ Frequent fairplay complaints;
- ❖ Frequently mentioning or threatening with account closure;
- ❖ Frequent requests for bonuses / free spins / cash, “bonus begging”;
- ❖ Mentioning losses;
- ❖ Requesting to speed up withdrawals / mentioning financial concerns - quick loans, loan to gamble, debts;
- ❖ Mentioning chasing losses;
- ❖ Mentioning gambling as time consuming;
- ❖ Wanting to understand own account activity;
- ❖ Mentioning being under the influence;
- ❖ Frequent contacts at night/ working hours;
- ❖ Mentioning being depressed, angry, frustrated;
- ❖ Signs of aggression, intimidation and distress;
- ❖ Has the player mentioned any vulnerable life situations, such as death in the family, a break up, illness, loss of job, mental health struggles or behavior altering medication.

Account activity (at risk behavior)

- ❖ Canceled withdrawals;
- ❖ Frequent failed deposits;
- ❖ High deposit frequency, many small, repeated deposits;
- ❖ A significant increase in deposits / spend / bets;
- ❖ A significant decrease in deposits / spend / bets often followed by failed deposits;
- ❖ Repeated changes in the responsible gambling account limits/ high limits set on the account;
- ❖ Multiple payment methods, and a customer switching between payment methods, especially if the switch follows a denied deposit attempt;

- ❖ Previous account closures, self-exclusions, or repeated cool off's;
- ❖ A big win;
- ❖ Attempts to use a third-party method to deposit;
- ❖ A significant amount of time spent playing, or playing during odd hours (early morning/late night and/or working hours).

Documentation

- ❖ Signs of debts in a bank statements or similar;
- ❖ Loan (*especially quick loans which could have been taken in order to gamble);
- ❖ Negative balance in a bank account;
- ❖ Other signs of financial struggles, such as support from government due to unemployment, or being at minimum salary;
- ❖ Statement showing an income that does not match the level of spend in the account;
- ❖ Signs of significant spend to other gambling operators;
- ❖ Documents showing underlying health conditions, or medication which may affect behavior.

- 2) **Interact** with customers who may be at risk of or experiencing harms associated with gambling and take actions where appropriate.

Ngame NV takes effective steps to address problem gambling and, or prevent players from developing gambling problems. This includes:

- ❖ the identification of a player's actions or behavior that will trigger an intervention by the staff responsible for initiating the player interaction;
- ❖ the identification of a player's actions or behavior that might result in the a responsible gambling interaction informing the player of the responsible gaming tools that can be used;
- ❖ the identification of a player's actions or behavior that might result in imposing limits on the player's account and;
- ❖ the identification of a player's actions or behavior that might result in the block or exclusion of the player's account

- 3) **Follow up and evaluate** the impact of the interaction on the customer, and the effectiveness of the measures taken.

In order to carry out measures to protect players from harm, and mitigate the risks connected to gambling, Ngame NV has created various identification processes that

take into consideration the importance of a combined approach of data driven metrics and human evaluation in order to efficiently identify and target at-risk behaviors and problem gambling.

The company has the following alerts in place to flag a customer that may be at-risk:

- ❖ **Manual alerts:** The customer facing teams, and the teams that evaluate customer activity on a daily basis are trained in being able to recognize signs of potential gambling problems in activity and communication and send such cases for review to the specialized RG employees.

7.1. Functionalities

Following regulatory requirements and as part of our efforts to create a safe environment for gambling, the company offers a wide variety of responsible gambling tools for players to take control and limit the time and money they spend on gambling if wanted:

- **Limits:** Upon registration and any time after registration, players are provided with the possibility to set different gambling limits. These limits are offered by Ngame NV to help the player control their gambling on a time and financial basis. Players are able to easily access the Responsible Gambling page to set the following limits:
 - Deposit limits: where the amount a player deposits into their account is limited over a period of time chosen by the player
 - Loss limits: where the amount lost (i.e., winnings subtracted from the amount spent) is restricted over a period of time chosen by the player.
- **Self-assessment Test:** As a licensed operator, we have an obligation to provide a self-assessment test to our customers so they can become aware of their gambling habits. This self-assessment test is linked to on the site and easily accessible to the customer.
- **Cool off/ Time-Out:** this tool provides a time out facility for its customers for the following durations: 24 hours, 1 week, or 1 month. During this period, the customer will not be able to log in to the Ngame NV website and we will take all reasonable steps to prevent any marketing material or other communications being sent to the user.

- **Self-exclusion:** in order to prevent access to gambling for a longer period of time, a player can activate a self-exclusion period. The following self-shutdown periods are available: either for a specific period of time or indefinite.

Ngame NV has available to all players, at all times, a system whereby players may exclude themselves from playing for a definite or indefinite period of time. Throughout this period, the player who has opted for a definite or indefinite self-exclusion period cannot gain access to their account nor games. A notice by the player increasing the period of self-exclusion will be effective immediately upon its receipt.

Players who request a closure, or permanent closure, of an account will be asked for the reasons of closure to be able to determine whether or not the closure request should be interpreted as a self-exclusion request.

Any exclusion requested by a player includes a block for all the games offered by Ngame NV and will only be implemented by Ngame NV staff:

- a) upon the request of the player, for example by contacting customer support, or by means of an automated process using remote communication; or
- b) by our specialized RG staff if there are sufficient reasons to indicate that the player may have a gambling problem.

Any exclusion may only be removed:

- a) upon request of the relevant player;
- b) upon expiry of the set duration.

A request to have a self-exclusion removed will only be accepted upon the player providing an explanation further to the circumstances that led to such a request being made. Taking into account our own policies and procedures, and the explanation provided by the player, the responsible gambling team will decide to either accept or reject such a request, and inform the player of such decision in writing as soon as is reasonably possible and in no case later than seven 7 days from the date on which the request was made.

8. Record Keeping

Record keeping is key when performing any action on an account. The follow-up information on a note will help us understand why an action was taken, when, by whom and for what purpose.

All customer interactions related with the “Interaction” phase will be properly recorded in a centralized file apart from the back-office. Notes must enable us to demonstrate when and why there was an interaction with the customer.

- ❖ they must be kept for all customer interactions, including where an interaction did not take place.
- ❖ all relevant sources of information taken in consideration when deciding to interact shall be recorded
- ❖ all the actions taken in the account, and the reasons/indicators behind that decision

Ngame NV keeps records of the account reviews and measures taken in an account. Notes are kept directly in the player account back-office, and in logs dedicated to player protection. Logs are used to keep a clear audit trail, and to keep track of player behavior to follow up and evaluate changes in behavior following responsible gambling interactions.