

Responsible Gaming Procedure Gladiator Holding N.V.

Document Control

Version	Date	Description of Changes	Author
1.0	03/02/2026	Initial draft	IGA Trust B.V.

1. Introduction

Gladiator Holding N.V. (referred to as "Gladiator Holding N.V." or "the Company") provides entertainment services, considering the specifics of gambling and associated risks. One of the main objectives of the company is to follow the principles of responsible gambling. The safety and reliability of the game guide the development of high-quality services and products. Special conditions created by Gladiator Holding N.V.. are designed to promote responsible gambling and mitigate potential negative consequences in case of gambling addiction.

2. Purpose

The purpose of this document is to establish comprehensive rules and guidelines for the reporting of irresponsible gambling. It serves as a framework to ensure the safety and well-being of our users by maintaining a responsible gaming environment.

3. Definition of Responsible Gaming

Responsible gaming is a fundamental principle that guides our commitment to providing a secure online gaming experience. It entails our dedication to preventing underage individuals from participating in gambling activities and identifying those who may have lost control over their gambling habits, despite facing negative consequences or expressing a desire to stop.

4. Measures to Promote Responsible Gambling

To uphold our commitment to responsible gambling, Gladiator Holding N.V.. has implemented various measures aimed at ensuring the well-being of our users. These measures include:

- Publish a clear and accessible Responsible Gaming policy for players.
- Provide Responsible Gaming tools and informational resources.
- Implement monitoring systems to detect and manage problematic gambling behaviour.
- Comply with regulatory reporting and auditing obligations.
- No credit may be offered to players for wagering.

5. Mandatory Responsible Gaming Elements

5.1 Age verification

5.1.1 Participation in any games of chance offered by Gladiator Holding N.V. is strictly prohibited for individuals under the age of 18 years.

5.1.2 Age Verification Procedures

- Initial Registration – Self-Attestation. During account creation, all players are required to:
 - Enter their full date of birth.
 - Confirm they are over 18 years of age by checking a mandatory age declaration checkbox.
 - A warning message is displayed stating: “It is illegal to gamble under the age of 18. If you enter false information, you are committing fraud.”
- 3.2 System-Driven Risk Flags
 - Use of obviously invalid or suspicious dates of birth.
 - Email addresses or payment details associated with previous underage attempts.
 - Country-specific age of majority discrepancies.

5.1.3 Mandatory Document Verification

- No player shall be permitted to make a first withdrawal or exceed the risk-based verification threshold without submitting a valid proof of age. The following are mandatory:
 - Government-issued photo ID (passport, national ID card, or driver's license).
 - Screenshots or cropped documents are not accepted.
 - The document must be clear and valid (not expired).
 - Documents are cross-verified against registration data.

5.1.4 Detection of a Minor After Account Creation

- If the operator becomes aware that a minor has gained access, the following actions will be taken immediately:
 - The account will be closed without delay.
 - The operator will refund all deposits made by the player.
 - All winnings will be forfeited in accordance with legal requirements.

5.1.5 Record Keeping and Audits

- All records relating to age verification checks (including documents submitted, verification outcomes, communications, and decisions) are securely stored for a minimum of 5 years.
- These records will be made available to the Curacao Gaming Authority (CGA) upon request.

5.2 Accessible Responsible Gaming information

5.2.1 Responsible Gaming Section

- Information on responsible gambling practices.
- Direct access to tools such as self-exclusion, cooling-off periods, and deposit limits.
- Contact details for Responsible Gaming support [email] and live chat.
- Content in both English and [the language(s) of our target market, please indicate the language].

5.2.2 Homepage Visibility

- A clear and visible link to the RG Section is available on the homepage.

5.2.3 Terms & Conditions

- Reference the RG Section.
- Are accessible within one click from the homepage.
- Inform players of available Responsible Gaming tools and their use.

5.2.4 Footer Requirements

- The website footer displays:
 - A warning that underage gambling is prohibited.
 - The name, address, and CGA license number of the operator.
 - A statement confirming CGA regulatory oversight.
 - The CGA digital seal.
 - Links to [GambleAware](#)

5.3 Player self-assessment tools

5.3.1 Access to Account History

- Longer transaction histories can be requested and will be provided within 10 working days.
- If delays occur due to exceptional circumstances, an extension may be granted by the CGA.

5.3.2 Self-Assessment Tools

- We offer access to Gamblers Anonymous 20-Question Quiz [Link to quiz](#)
- Interpreting the results of:
 - 0 "Yes" answers: Low risk for gambling problems.
 - 1 "Yes" answer: Moderate risk; further assessment may be needed.

- 2+ “Yes” answers: High risk; further evaluation and intervention are strongly Recommended.

5.3.3 Follow-Up Recommendations

- Players who identify risky behaviors are advised to:
 - Deposit limits
 - Cooling-off periods
 - Self-exclusion options]

5.4 Gambling behaviour tracking

5.4.1 Monitoring Indicators

- Our system and staff monitor the following behaviours that may indicate problematic gambling:
 - Sudden increases in deposit or wagering activity
 - Repeated failed transactions due to insufficient funds
 - Frequent reversal of withdrawal requests
 - Extended, unexplained gaming sessions
 - Excessive or agitated contact with customer support
 - Repeated changes to Responsible Gaming tools
 - Maxing out of credit cards or signs of financial stress
 - Attempts to create multiple accounts

5.4.2 Identification & Intervention Procedures

- A risk-based profiling system is used to assess player behaviour.
- All concerns and interactions are logged in the Player Account Management (PAM) system.
- Interventions include:
 - Promoting use of RG tools (e.g., limits, cooling-off, self-exclusion)
 - Imposing temporary limits or suspending the account
 - Permanent exclusion in severe or repeated cases

5.4.3 Compliance Assurance

- Responsible Gaming measures will never be misused to delay withdrawals. Any misuse is a violation of licensing conditions and will result in disciplinary action.

5.5 Cooling-Off and Self-Exclusion

5.5.1 Players must be clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable. The information must be available at all time via the RG Section of the website

	Cooling Off	Self-Exclusion
Wagering Prohibited	Player selection – all or by vertical.	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No

Brands	Current brand or All operator brands – as selected	All brands/domains under the operator’s license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None
Ante post bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing message	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. Operator should have a plan to fully automate this process in short term.
Reactivation	Automatic	Player initiated

5.5.2 Cooling-Off

- Available durations: 24 hours, 7 days, 1 month, or 3 months
- Scope options: Players may select preferences for (Tick-boxes must not be prechecked.):
 - Duration (mandatory)
 - Marketing opt-out (mandatory)
- Implementation:
 - Takes immediate effect—no bonuses or promotional offers will be presented
 - Accounts remain active for withdrawals; all gambling features are disabled
 - Cooling-off ends automatically; no action required by the player
 - If selected, players will not receive marketing during the cooling-off period

5.5.3 Self-Exclusion

- Available durations: 1 year, 3 years, 5 years, 10 years, or lifetime
- Scope options: Players may select preferences for:
 - Duration (mandatory)
 - Applies to all brands, all products
 - Automatic marketing opt-out
 - Players can initiate and complete the self-exclusion process directly from their personal account, without the need for support agent involvement or approval.
- Implementation:
 - Takes immediate effect once confirmed by the player
 - Account is fully closed and inaccessible
 - Operator will block known payment methods and prevent duplicate accounts
 - Any bets placed before the exclusion takes effect must be voided and refunded
 - Progressive jackpot contributions remain in place, but the player forfeits further participation
 - No marketing or contact is allowed during the exclusion period

- Reactivation:
 - Self-exclusion is irrevocable during the selected period
 - After expiry, the player must formally request reactivation in writing via customer support through info@b52.club or live chat

5.5.4 Operator-Initiated Exclusion

- Gladiator Holding N.V. may enforce a mandatory exclusion if:
 - The player exhibits signs of problematic gambling
 - There is suspicion or evidence of criminal activity
- Such exclusions are never based on a player's winnings.
- All cases are documented and retained for a minimum of five years.

5.6 Deposit limits

5.6.1 Players can set deposit limits for daily, weekly, or monthly periods.

- Once a deposit limit is reached, no further deposits can be made until the specified period resets
- If a player requests to increase the restrictiveness of their deposit limit, the change must take effect immediately.
- If a player requests to decrease the restrictiveness (i.e., raise the limit), the change must be subject to a minimum 24-hour cooling-off period before implementation.
- Any wagers (settled or unsettled) made prior to a deposit limit being set are not affected by the new limit.

5.7 Responsible advertising/marketing

5.7.1 Prohibited Marketing Practices

- No targeting of vulnerable groups: Visuals or messaging must not appeal directly to vulnerable individuals.
- No portrayal of gambling as an investment: Advertising must not suggest gambling can generate income or solve financial issues.
- No misrepresentation of chance vs. skill: Marketing must not imply that chance-based games can be influenced by skill.
- No emotional manipulation: Gambling must not be presented as a solution to emotional or mental problems.
- No use of minors: Minors must not appear in, or be depicted as engaging with, gambling-related content.
- No explicit content: Sexual or pornographic imagery or innuendo is strictly prohibited.
- No promotion of harmful behaviors: There must be no link between gambling and alcohol, drugs, smoking, seduction, or attractiveness.

5.7.2 Bonuses and Promotions

- All bonuses must be clearly communicated with transparent terms and conditions.
- Bonuses must not encourage excessive or irresponsible gambling.

5.7.3 Third-Party Involvement

- Operators are responsible for ensuring that all affiliates, ambassadors, and influencers comply with Responsible Gaming guidelines.
- Any third-party promoting the operator's brand must be made aware of the Responsible Gaming policy and required to follow it.

5.7.4 Responsible Gaming Messaging

- All advertisements must prominently display a Responsible Gaming message or slogan.

5.8 Staff training in Responsible Gaming

5.8.1 Initial Training

- All customer-facing and RG staff must complete RG training before starting duties. New hires must be trained within [e.g., one month] of joining.

5.8.2 Update Training

- Required when new RG tools, policies, or regulatory changes are introduced.

5.8.3 Training Covers

- Identifying gambling-related distress.
- Handling sensitive player interactions.
- Escalation procedures.
- Use of RG tools and support services.

5.8.4 Training Approach

- Online courses (e.g., iGaming Academy, Internal LMS)
- On-site classroom training led by trainers or managers

6. Responsible Gaming Officer / Role

6.1 The Responsible Gaming Officer: Wen-Jun Hsieh, Contact email at licensing@igagroup.com

6.2 The Responsible Gaming Officer must:

- Submit a Responsible Gaming report at least once every 12 months to management.
- Include policy effectiveness evaluation and recommendations for improvement.
- Report any material policy changes to the CGA.