

# **Responsible Gaming Policy**

Cura Casino B.V.

1. **Purpose and Scope**
2. **Definitions**
3. **Responsible Gaming Principles**
4. **Player Protection Measures**
5. **Age Verification and Minor Protection**
6. **Player Information and Education**
7. **Self-Assessment and Self-Exclusion**
8. **Deposit, Loss, and Time Limits**
9. **Behavioral Monitoring**
10. **Intervention and Support**
11. **Advertising and Marketing Standards**
12. **Staff Training**
13. **Record Keeping**
14. **Governance and Oversight**
15. **Policy Review and Continuous Improvement**

# **1. Purpose and Scope**

## **1.1 Purpose**

This **Responsible Gaming Policy** (hereinafter “Policy”) defines the commitment of Cura Casino B.V. (hereinafter “the Company”) to operate its gaming services in a socially responsible manner. The Company recognizes that while gaming is a form of entertainment enjoyed by the vast majority of Players responsibly, a minority of individuals may experience harm as a result of problem gambling.

The objectives of this Policy are to:

- Protect Players from gambling-related harm.
- Prevent underage gambling.
- Promote informed Player choice and healthy gaming behavior.
- Provide tools and mechanisms to support Players in controlling their gambling.
- Intervene proactively where signs of problem gambling are detected.
- Promote a responsible gaming culture across all Company operations.
- Comply with applicable laws and regulations in Curaçao and other applicable jurisdictions.
- Align with best practices in responsible gaming established by international bodies such as the European Committee for Standardization (CEN), the World Lottery Association (WLA), and the Global Gambling Guidance Group (G4).

## 1.2 Scope

This Policy applies to:

- All Players who register and use the Company's gaming services.
- All employees, contractors, and representatives of the Company.
- All Company marketing, advertising, and promotional activities.
- All third-party service providers engaged to provide products or services on behalf of the Company.

This Policy is implemented in conjunction with the following related Company policies:

- Anti-Money Laundering and Countering Financing of Terrorism (AML/CFT) Policy
- Know Your Customer (KYC) Policy
- Data Protection and Privacy Policy
- Client Acceptance Policy
- Customer Support and Complaints Handling Policy

This Policy is mandatory and binding upon all parts of the Company and all persons acting on its behalf.

## 2. Definitions

**Responsible Gaming:** A set of policies, practices, and initiatives designed to prevent and reduce gambling-related harm, while ensuring a safe and fair gaming environment.

**Problem Gambling:** Gambling behavior that disrupts or damages personal, family, or vocational pursuits, including but not limited to gambling addiction.

**Self-Exclusion:** A process by which a Player voluntarily excludes themselves from accessing the Company's gaming services for a defined period or permanently.

**Underage Gambling:** Gambling activity engaged in by individuals below the legal age for participation in gaming services.

**Behavioral Monitoring:** The process of observing and analyzing Player activity and behavior patterns to identify indicators of potential gambling-related harm.

**Deposit Limits:** Restrictions set on the maximum amount a Player may deposit within a defined time period.

**Loss Limits:** Restrictions set on the maximum amount a Player may lose within a defined time period.

**Time Limits:** Restrictions set on the maximum amount of time a Player may spend engaged in gaming activities.

## 3. Responsible Gaming Principles

Cura Casino B.V. is committed to upholding the highest standards of integrity, fairness, and social responsibility in its operations. The Company recognizes that the provision of gaming services carries inherent risks and obligations, and that it has a duty of care to its Players and the wider community.

The following principles govern the Company's approach to Responsible Gaming:

### 3.1 Protection of Vulnerable Players

The Company is committed to identifying and protecting vulnerable Players, including those who are at risk of developing gambling problems or who are already experiencing harm from gambling.

The Company shall implement:

- Proactive behavioral monitoring to detect early signs of problem gambling.
- Self-exclusion mechanisms.
- Player protection tools such as deposit, loss, and time limits.
- Interventions and referrals to appropriate support services.

### **3.2 Prevention of Underage Gambling**

The Company maintains a **zero-tolerance policy** towards underage gambling.

The Company shall:

- Conduct robust age verification checks during Player registration.
- Prevent minors from accessing its gaming services.
- Educate staff and Players about the risks of underage gambling.
- Report any suspected incidents of underage gambling to the appropriate authorities.

### **3.3 Promotion of Informed Player Choice**

The Company shall empower Players to make informed choices about their gaming behavior.

To this end, the Company shall:

- Provide clear and accurate information about the risks of gambling.
- Ensure that all marketing and advertising materials are socially responsible.
- Offer tools that enable Players to manage and control their gambling.
- Promote awareness of Responsible Gaming and support services.

### **3.4 Fair and Transparent Gaming Environment**

The Company shall provide a gaming environment that is:

- Fair.
- Transparent.
- Free from exploitation or coercion.

Players shall be provided with:

- Clear terms and conditions.
- Transparent game rules and payout information.
- Access to account history and transaction records.
- Mechanisms to raise complaints and disputes.

### **3.5 Responsible Marketing and Advertising**

The Company shall ensure that all marketing and advertising:

- Complies with applicable laws and codes of practice.
- Is not misleading or deceptive.
- Does not target minors or vulnerable persons.
- Promotes Responsible Gaming messages where appropriate.

### **3.6 Collaboration with Stakeholders**

The Company recognizes that effective Responsible Gaming requires collaboration with:

- Regulators.
- Industry bodies.
- Problem gambling support organizations.
- Payment service providers (PSPs).
- Data protection authorities.

The Company shall engage with these stakeholders to:

- Promote Responsible Gaming best practices.
- Share knowledge and insights.
- Contribute to public policy development.

### **3.7 Continuous Improvement**

The Company is committed to:

- Regularly reviewing its Responsible Gaming measures.

- Benchmarking against industry best practices.
- Leveraging technology to enhance Player protection.
- Training staff to recognize and respond to problem gambling.
- Evaluating the effectiveness of its Responsible Gaming programs.

## 4. Player Protection Measures

The Company implements a comprehensive suite of **Player Protection Measures** designed to:

- Prevent gambling-related harm.
- Empower Players to manage their gaming behavior.
- Ensure compliance with Responsible Gaming obligations.

Player protection is a **core element** of the Company's risk management framework and is embedded throughout the Player lifecycle.

### 4.1 Responsible Gaming Tools

The following tools are provided to all Players, free of charge:

#### **Deposit Limits**

Players may set daily, weekly, and monthly limits on the amount they may deposit to their account.

#### **Loss Limits**

Players may set daily, weekly, and monthly limits on the maximum amount they may lose while playing.

#### **Time Limits**

Players may set limits on the amount of time they may spend gaming in a given session or day.

#### **Reality Checks**

Players shall receive periodic **Reality Check pop-ups** that display session duration and provide a reminder of the Player's Responsible Gaming options.

## **Session Timeout**

Players may choose to take a **temporary break** (session timeout) for a defined period, during which time their account will be inaccessible.

## **Self-Exclusion**

Players may activate **Self-Exclusion** for a defined period or permanently (see Section 7).

## **4.2 Mandatory Interventions**

The Company shall implement **mandatory interventions** where:

- A Player's behavior triggers predefined Responsible Gaming thresholds.
- The Player exhibits signs of potential gambling-related harm (as determined by behavioral monitoring and/or manual review).

Interventions may include:

- Contacting the Player to discuss their gaming behavior.
- Offering or imposing session breaks.
- Offering or imposing deposit or loss limits.
- Recommending Self-Exclusion.
- In extreme cases, suspending or closing the Player account (with appropriate documentation and MLRO oversight).

## **4.3 Cooling-Off Periods**

The Company offers **cooling-off periods** of between 24 hours and 6 weeks.

During a cooling-off period:

- The Player's account is suspended.
- No gameplay or deposit activity is permitted.
- The Player cannot reverse or shorten the cooling-off period once initiated.

## **4.4 Accessibility of Tools**

Responsible Gaming tools shall be:

- Clearly visible and easily accessible on the Company's gaming platform.
- Presented in a manner that encourages Player engagement.
- Accompanied by clear explanations of their purpose and functionality.

Players shall be able to adjust or activate Responsible Gaming settings **without undue delay** or complexity.

#### **4.5 Player Account Information**

Players shall have access to:

- Their full deposit, wagering, and withdrawal history.
- Session time history.
- Reality Check configuration.
- Active limits and self-exclusion status.

#### **4.6 Protection of Player Rights**

In implementing Player Protection Measures, the Company shall:

- Respect Player autonomy and dignity.
- Avoid discrimination or stigmatization.
- Handle Player data in compliance with applicable **data protection laws** (GDPR and local laws).

#### **4.7 Staff Training**

All relevant staff shall be:

- Trained to understand and explain Player Protection Measures.
- Capable of assisting Players in setting or adjusting limits.
- Able to recognize signs of gambling-related harm and escalate concerns appropriately.

Training shall be conducted:

- On induction.
- Annually.

- Ad hoc following material changes in regulation or Company policy.

## 5. Age Verification and Minor Protection

### 5.1 General Principles

The Company maintains a **zero-tolerance policy** toward **underage gambling**. It is a core commitment of this Responsible Gaming Policy to ensure that **minors** — defined as any individual below the legal age for participation in gaming under Curaçao law or the law of the Player's jurisdiction — are effectively prevented from accessing the Company's gaming services.

The Company recognizes that minors are particularly vulnerable to gambling-related harm and that robust controls must be in place to protect them.

### 5.2 Legal Framework

The Company complies fully with:

- The National Ordinance on Games of Chance (as applicable).
- Curaçao Gaming Control Board (GCB) Guidelines.
- Applicable laws of Players' jurisdictions regarding minimum legal gambling age.
- Best practices under EU and international Responsible Gaming standards.

The **minimum permitted age** for participation in the Company's gaming services is:

- **18 years** or such higher age as may apply in the Player's jurisdiction of residence.

### 5.3 Age Verification Process

#### Initial Verification

Age verification is a mandatory component of the Company's **Know Your Customer (KYC) process** (see Section 3 of the KYC Policy).

The following steps are taken:

- Players are required to provide their **date of birth** during registration.
- System rules block registration where declared age is below the legal minimum.

## Documentary Verification

- The Player must submit **government-issued identification** (passport, national ID, residence permit, or driver's license) as part of the identity verification process.
- The Compliance / KYC team verifies that:
  - The Player's date of birth confirms they are of legal age.
  - The document is genuine and unaltered.

## Automated Screening

- Automated screening systems flag:
  - Inconsistent date of birth entries.
  - Known attempts to circumvent age controls.
- Where discrepancies or suspicion arise, the Player account is:
  - Immediately suspended.
  - Subject to further investigation.

## 5.4 Access Controls

- The Company employs **technical access controls** to prevent minors from accessing its gaming platform, including:
  - Mandatory account registration and verification prior to gameplay.
  - No guest or anonymous play.
  - Age gates and warning notices on all marketing materials and the Company website.

## 5.5 Parental Controls and Advice

The Company promotes awareness of **parental control tools** that can assist in preventing minors from accessing online gaming content, such as:

- Content filtering software.
- Parental control settings on devices.

Information on parental controls is provided on the Company's Responsible Gaming webpages.

## **5.6 Reporting and Handling of Incidents**

### **Suspected Underage Gambling**

Where underage gambling is suspected or detected:

- The account is immediately suspended.
- A full investigation is conducted.
- If underage gambling is confirmed:
  - The account is permanently closed.
  - Any deposits are returned to the source of funds, subject to legal and regulatory obligations.
  - Any winnings are forfeited in accordance with the Terms & Conditions and applicable law.
  - The incident is reported to the MLRO and Legal Department.
  - A Suspicious Transaction Report (STR) is filed where applicable.

### **Mandatory Reporting**

Confirmed cases of underage gambling are reported to:

- The Curaçao Gaming Control Board.
- The Financial Intelligence Unit (FIU) where an STR is required.
- Law enforcement authorities where legally mandated.

## **5.7 Staff Training and Awareness**

- All relevant staff are trained to:
  - Understand the legal and regulatory framework for age verification.
  - Perform document checks effectively.
  - Identify and escalate suspected underage gambling.
- Training is mandatory:
  - On induction.

- Annually.
- Upon material changes to applicable law or Company policy.

## 6. Player Information and Education

### 6.1 General Principles

The Company recognizes that **informed Player choice** is fundamental to Responsible Gaming. Players must be provided with:

- Clear, accurate, and accessible information about:
  - The risks associated with gambling.
  - The Company's Responsible Gaming tools and services.
  - Where to seek help and support.

The Company is committed to promoting **Responsible Gaming awareness** as an integral part of its Player engagement and communications strategy.

### 6.2 Responsible Gaming Webpages

The Company maintains a dedicated **Responsible Gaming** section on its website that includes:

- An explanation of the Company's commitment to Responsible Gaming.
- Information about gambling risks and signs of problem gambling.
- A self-assessment questionnaire.
- Detailed information about available Responsible Gaming tools:
  - Deposit, loss, and time limits.
  - Session time reminders (Reality Checks).
  - Self-exclusion options.
  - Cooling-off periods.
- Contact details for recognized **problem gambling support organizations** (see Section 10).

- Information for parents regarding **underage gambling prevention**.
- Instructions on how to contact Customer Support for further assistance.

The Responsible Gaming pages are:

- Accessible via a **permanent footer link** on every page of the Company's website and gaming platform.
- Designed to be user-friendly and available in all languages supported by the platform.

### **6.3 Player Onboarding Communication**

During Player registration and onboarding:

- Players are informed of:
  - The availability of Responsible Gaming tools.
  - The ability to set limits.
  - The Self-Exclusion process.
- The Company's Terms & Conditions include explicit references to:
  - Responsible Gaming policies.
  - The legal age requirement for participation.

### **6.4 Ongoing Player Communication**

The Company shall:

- Include Responsible Gaming messages and reminders within:
  - Account management pages.
  - Deposit flows.
  - Withdrawal flows.
  - Reality Check pop-ups.
- Periodically remind Players of:
  - Their ability to adjust or activate limits.
  - The availability of Self-Exclusion.

- The existence of external support resources.

## 6.5 Responsible Marketing Communication

Responsible Gaming messages shall be incorporated into the Company's **marketing and advertising** materials where appropriate, in accordance with Section 11 of this Policy.

All marketing shall:

- Avoid portraying gambling as a solution to financial or personal problems.
- Avoid suggesting that gambling enhances social, professional, or personal success.
- Promote gambling as a form of entertainment, not a means of income.

## 6.6 Encouraging Self-Awareness

The Company encourages Players to regularly evaluate their gaming behavior.

The Responsible Gaming webpages include a **self-assessment questionnaire** designed to help Players:

- Reflect on their gaming habits.
- Identify potential signs of problem gambling.
- Make informed decisions about whether to seek additional support.

## 6.7 Player Contact and Support

Players are encouraged to contact the Company's **Customer Support team** if they:

- Have questions about Responsible Gaming tools.
- Require assistance in setting or adjusting limits.
- Wish to request Self-Exclusion or a cooling-off period.
- Are concerned about their own or another person's gambling behavior.

Customer Support staff shall:

- Be trained to respond appropriately and sensitively.
- Be able to provide clear guidance on available tools and resources.
- Be empowered to escalate concerns to the Compliance / Responsible Gaming team where appropriate.

# 7. Self-Assessment and Self-Exclusion

## 7.1 General Principles

The Company recognizes that **Self-Exclusion** is one of the most important Responsible Gaming tools available to Players. It provides a mechanism for Players to proactively protect themselves by **voluntarily restricting their access** to gaming services.

The Company also promotes **Self-Assessment** as a means to encourage Players to reflect on their gaming behavior and to seek help where needed.

## 7.2 Self-Assessment Tools

### Self-Assessment Questionnaire

The Company provides a **Self-Assessment Questionnaire** on its Responsible Gaming webpages. This questionnaire:

- Enables Players to evaluate their gambling behavior.
- Helps Players identify potential risk factors or problematic patterns.
- Provides tailored recommendations based on the Player's responses.

### Encouragement of Use

Players are encouraged to use the Self-Assessment Questionnaire:

- On a regular basis.
- Whenever they experience concerns about their gambling.
- In conjunction with the use of Responsible Gaming tools (limits, Reality Checks, etc.).

## 7.3 Self-Exclusion Process

### Voluntary Self-Exclusion

A Player may request **Self-Exclusion** at any time for:

- A defined temporary period (minimum of 6 months).

- An indefinite period (permanent Self-Exclusion).

### **Activation of Self-Exclusion**

Self-Exclusion may be activated by the Player:

- Via the Responsible Gaming pages on the Company's website.
- By contacting Customer Support.

Requests for Self-Exclusion are:

- **Processed immediately** upon receipt.
- Confirmed to the Player in writing.
- Accompanied by clear information about the consequences of Self-Exclusion.

### **Consequences of Self-Exclusion**

When Self-Exclusion is activated:

- The Player account is **immediately suspended**.
- All deposit, gameplay, and withdrawal functionality is disabled.
- All marketing communications are suspended.
- The Player is informed of:
  - Their exclusion status.
  - Available external support resources.
  - The process for lifting Self-Exclusion (where applicable).

### **System Handling of Self-Excluded Accounts**

The Company's systems ensure that:

- Self-Excluded Players cannot access their accounts.
- New registrations by Self-Excluded Players are automatically blocked based on:
  - Identity.
  - Email address.

- Device fingerprinting (where supported).
- Other unique identifiers.

### **Duration of Self-Exclusion**

- For **temporary Self-Exclusion**, the account remains closed for the entire exclusion period.
  - The Player cannot shorten or revoke the exclusion once initiated.
  - At the end of the exclusion period, the account may only be reopened after:
    - A cooling-off period of at least 24 hours.
    - A written request from the Player.
    - A responsible gaming review by the Company's Responsible Gaming team.
- For **permanent Self-Exclusion**, the account remains permanently closed.
  - The Player cannot reopen the account.
  - Any new account attempts will be blocked.

## **7.4 Third-Party Self-Exclusion Requests**

In certain cases, third parties (e.g. family members) may contact the Company to express concerns about a Player's gambling behavior.

While respecting legal and privacy obligations, the Company shall:

- Assess such requests seriously.
- Engage with the affected Player where appropriate.
- Provide information on available Responsible Gaming tools.
- Offer support and guidance.

The Company will not implement Self-Exclusion solely based on third-party requests but will facilitate the Player's informed decision to Self-Exclude where warranted.

## **7.5 System Integrity and Testing**

The Self-Exclusion process and associated system controls shall be:

- Tested periodically to ensure effectiveness.
- Subject to internal audit.
- Reviewed following any major system changes.

## **7.6 Reporting Obligations**

Confirmed cases of Self-Exclusion shall be:

- Recorded in the Player's account file.
- Reported internally to:
  - The Responsible Gaming team.
  - The Compliance team.
- Included in quarterly reports to the Risk Committee and Board of Directors.

Where legally required, aggregated Self-Exclusion data may be reported to:

- The Curaçao Gaming Control Board (GCB).
- Other relevant regulatory bodies.

## **7.7 Staff Training**

All relevant staff shall be trained to:

- Understand the Self-Exclusion process and its importance.
- Process Self-Exclusion requests sensitively and promptly.
- Communicate clearly with Players regarding their rights and options.
- Escalate complex cases to the Responsible Gaming team where necessary.

# 8. Deposit, Loss, and Time Limits

## 8.1 General Principles

**Pre-commitment limits** — the ability of Players to set financial and time-based controls on their gaming activity — are a fundamental component of the Company's Responsible Gaming strategy.

The Company is committed to:

- Empowering Players to **manage their own gambling behavior**.
- Preventing gambling-related harm by enabling Players to stay within their personal limits.
- Ensuring that system-enforced limits are robust and reliable.

## 8.2 Availability of Limit Options

All Players are provided with the following Responsible Gaming limit-setting options:

### Deposit Limits

- Players may set limits on the **maximum amount they may deposit**:
  - Per day
  - Per week
  - Per month

### Loss Limits

- Players may set limits on the **maximum amount they may lose**:
  - Per day
  - Per week
  - Per month

### Time Limits

- Players may set limits on the **maximum amount of time** they may spend playing:
  - Per session

- Per day

These options are:

- Clearly presented on the Responsible Gaming pages and in the Player account area.
- Available at any time after account registration.
- Accessible on both desktop and mobile platforms.

### 8.3 Default and Voluntary Settings

- The Company does not impose default deposit, loss, or time limits unless required by applicable law or regulation.
- Players are actively encouraged to set **voluntary limits** upon account registration and through periodic prompts.
- Periodic Responsible Gaming messages remind Players of their ability to set or adjust limits.

### 8.4 System Enforcement of Limits

Once set by the Player:

- Limits are enforced automatically by the Company's gaming systems.
- The Player **cannot exceed** the applicable limit under any circumstance.

System controls ensure that:

- Deposit attempts beyond the Player's set limit are blocked.
- Gameplay is suspended once the Player reaches a loss or time limit.
- Players are notified in real time when a limit is reached.

### 8.5 Adjustment of Limits

#### Tightening Limits

- Players may **lower** their existing limits at any time.
- Requests to lower limits take **immediate effect**.

#### Loosening Limits

- Requests to **increase** or **remove** limits are subject to a mandatory **cooling-off period**:
  - Minimum of **24 hours**.
  - After the cooling-off period, the Player must **confirm the request** before it takes effect.

The Company ensures that:

- Players are provided with clear information about the consequences of increasing or removing limits.
- The Responsible Gaming team monitors limit adjustments for potential signs of problem gambling.

## 8.6 Monitoring and Intervention

- The Responsible Gaming team monitors patterns of limit-setting and adjustments.
- Where risk indicators are observed (e.g. repeated increases of limits following significant losses), appropriate interventions may be triggered:
  - Communication with the Player.
  - Offers of Self-Exclusion or cooling-off periods.
  - In severe cases, temporary or permanent account suspension (per Section 5 & 6).

## 8.7 Record Keeping

- All limit-setting and adjustment activity is logged in the Player's account file.
- Limit history is accessible to the Player in their account area.
- Data is retained in accordance with the Company's **Record Keeping** obligations (Section 13).

## 8.8 Staff Training

Relevant staff are trained to:

- Understand the role and function of deposit, loss, and time limits.
- Assist Players in setting or adjusting limits.
- Recognize problematic patterns of limit adjustments and escalate appropriately.

# 9. Behavioral Monitoring

## 9.1 General Principles

**Behavioral Monitoring** is a key component of the Company's Responsible Gaming framework. It enables the Company to:

- Identify early signs of gambling-related harm.
- Detect and analyze problematic gambling patterns.
- Implement timely and proportionate interventions.
- Support Players in maintaining control over their gaming behavior.

Behavioral Monitoring operates on the principle that **problem gambling often manifests through observable changes in Player behavior** over time.

## 9.2 Monitoring Framework

The Company implements a **multi-layered Behavioral Monitoring system**, comprising:

### **Automated Monitoring**

- The Company's systems continuously analyze Player activity for indicators of gambling-related harm.
- Automated monitoring covers:
  - Deposit frequency and escalation.
  - Betting patterns.
  - Session duration and frequency.
  - In-game behavior.
  - Use of Responsible Gaming tools (setting/removing limits, Self-Exclusion requests).
  - Communication with Customer Support.
  - Attempts to circumvent controls (multiple accounts, use of different devices).

## **Manual Monitoring**

- The Responsible Gaming team conducts regular **manual reviews** of:
  - High-risk Player accounts.
  - Players flagged by automated monitoring.
  - Players with Self-Exclusion or limit adjustment activity.
  - Players subject to third-party concerns or reports.
  - Any account where Customer Support staff raise Responsible Gaming concerns.

## **9.3 Risk Indicators**

The Company monitors for a wide range of **Responsible Gaming risk indicators**, including but not limited to:

### **Financial Indicators**

- Rapid increases in deposit amounts or frequency.
- Attempts to exceed deposit or loss limits.
- Repeated large deposits followed by large losses.

### **Time-based Indicators**

- Extended continuous play sessions.
- Multiple play sessions per day.
- Increase in session duration over time.

### **Behavioral Indicators**

- Repeated setting and removal of Responsible Gaming limits.
- Repeated requests to lift Self-Exclusion.
- Increasing agitation or distress in communications with Customer Support.
- Signs of gambling as a means to recoup losses.

### **Cross-Channel Indicators**

- Use of multiple accounts.
- Use of multiple devices or payment methods in close succession.

### **External Indicators**

- Concerns raised by third parties (family, friends, guardians).
- Reports from regulators or external support organizations.

## **9.4 Risk Scoring and Categorization**

- The Company applies a **risk scoring model** to behavioral indicators.
- Players are categorized into **risk tiers** based on observed behavior:
  - Low Risk.
  - Medium Risk.
  - High Risk.

Risk tiers inform the **level of monitoring and intervention** applied.

## **9.5 Intervention Processes**

When risk indicators are identified:

### **Initial Contact**

- The Responsible Gaming team may contact the Player via:
  - Email.
  - In-platform message.
  - Phone (if appropriate).

The purpose of initial contact is to:

- Raise awareness of observed behaviors.
- Offer support and information.
- Encourage use of Responsible Gaming tools.

### **Escalation**

- Where risk indicators persist or escalate, the Company may:
  - Recommend or impose deposit, loss, or time limits.
  - Recommend Self-Exclusion.
  - Temporarily suspend the Player account.
  - Permanently close the Player account in cases of severe or unresolvable risk.

All interventions are:

- Documented in the Player's account file.
- Subject to MLRO oversight where closure or reporting obligations may apply.

## 9.6 Third-Party Reports

- The Company treats reports from third parties about Player behavior with **serious consideration**.
- Such reports trigger a review of the Player's activity and risk profile.
- The Company balances **data privacy obligations** with the need to protect vulnerable Players.

## 9.7 Reporting and Oversight

- The Responsible Gaming team maintains:
  - Logs of all automated alerts.
  - Records of manual reviews and interventions.
- Quarterly reports on Behavioral Monitoring outcomes are provided to:
  - The Risk Committee.
  - The Board of Directors.

Emerging trends and typologies identified through Behavioral Monitoring are:

- Fed back into the Company's risk model.
- Used to inform updates to this Policy and related procedures.

## 9.8 Staff Training

- Relevant staff are trained to:
  - Understand key behavioral risk indicators.
  - Respond appropriately to automated alerts.
  - Conduct sensitive and effective Player communications.
  - Escalate concerns in line with Company procedures.

## 10. Intervention and Support

### 10.1 General Principles

The Company is committed to taking **timely and proportionate intervention** when indicators of gambling-related harm are identified.

The objectives of intervention are to:

- **Protect the Player** from further harm.
- Provide clear, supportive communication.
- Encourage engagement with Responsible Gaming tools.
- Facilitate access to **external support resources** where appropriate.
- Comply with legal and regulatory requirements.

Intervention is governed by the principles of:

- **Proportionality** — interventions are matched to the level of identified risk.
- **Sensitivity** — communications are non-judgmental and supportive.
- **Documentation** — all interventions are fully recorded.
- **Escalation** — serious cases are escalated appropriately.

### 10.2 Intervention Triggers

Interventions may be triggered by:

- Automated behavioral monitoring alerts.

- Manual review by the Responsible Gaming team.
- Reports from Customer Support staff.
- Third-party reports (family members, guardians, external organizations).
- Self-reported concerns by the Player.

## 10.3 Types of Intervention

### Informational Intervention

At early signs of risk:

- The Player is contacted via email or in-platform message.
- Information is provided about:
  - Responsible Gaming tools.
  - The Self-Assessment Questionnaire.
  - External support resources.
- The Player is encouraged to reflect on their gaming behavior.

### Interactive Intervention

At moderate risk levels:

- A member of the Responsible Gaming team engages the Player in **direct communication** (email or phone).
- The conversation includes:
  - Discussion of observed behaviors.
  - Encouragement to set limits or take a break.
  - Clear information about Self-Exclusion options.
  - Offer of referral to external support organizations.

### Restrictive Intervention

At high or escalating risk levels:

- The Company may:

- Impose mandatory limits.
- Recommend or implement a **cooling-off period**.
- Offer or enforce Self-Exclusion.
- Temporarily or permanently suspend the account.
- In severe cases, the account may be **closed** in line with Section 6 and under MLRO oversight.

## 10.4 Player Support Resources

The Company provides Players with access to **recognized problem gambling support organizations**, such as:

- **Gamblers Anonymous** — [www.gamblersanonymous.org](http://www.gamblersanonymous.org)
- **GamCare** — [www.gamcare.org.uk](http://www.gamcare.org.uk)
- **BeGambleAware** — [www.begambleaware.org](http://www.begambleaware.org)
- Local organizations as relevant to the Player's jurisdiction.

Contact details for these organizations are prominently displayed on the Responsible Gaming pages.

## 10.5 Partnerships and External Collaboration

Where feasible, the Company will:

- Engage with external support organizations to:
  - Promote awareness among Players.
  - Develop referral pathways.
  - Stay informed of emerging best practices.
- Participate in **industry Responsible Gaming initiatives**.
- Contribute to public policy dialogue on Responsible Gaming.

## 10.6 Documentation and Reporting

- All interventions are documented in the Player's account file.
- Records include:

- The nature and timing of intervention.
- Communications sent to the Player.
- Player responses.
- Actions taken by the Company.
- Quarterly reports on interventions are submitted to:
  - The Risk Committee.
  - The Board of Directors.

## 10.7 Staff Training

All staff involved in Player contact (Customer Support, Compliance, Responsible Gaming team) receive training on:

- The Company's intervention protocols.
- How to communicate with at-risk Players.
- How to refer Players to external support.
- How to document interventions appropriately.

Training is provided:

- On induction.
- Annually.
- Following significant policy updates or regulatory changes.

# 11. Advertising and Marketing Standards

## 11.1 General Principles

The Company is committed to ensuring that all **advertising, marketing, and promotional activities**:

- Are conducted in a **socially responsible** manner.

- Comply with applicable laws and regulatory requirements.
- Support the Company's Responsible Gaming commitments.
- Do not mislead or exploit Players.
- Do not target **minors** or other vulnerable individuals.

All staff, contractors, affiliates, and third-party marketing partners are bound by this section of the Policy.

## 11.2 Legal and Regulatory Compliance

All marketing and advertising activities shall comply with:

- The National Ordinance on Games of Chance (as applicable).
- Curaçao Gaming Control Board (GCB) Guidelines.
- Relevant laws in the jurisdictions where marketing is conducted.
- Applicable codes of practice and industry standards (e.g., European Advertising Standards Alliance, CAP Code in the UK).

## 11.3 Content Restrictions

Marketing and advertising shall **not**:

- Portray gambling as a **solution to financial problems**.
- Suggest that gambling can lead to **social, professional, or personal success**.
- Depict gambling as an essential component of **life fulfillment** or **personal achievement**.
- Target or feature individuals who are, or appear to be, **under the legal gambling age**.
- Misrepresent the chances of winning.
- Imply that gambling is **free of risk**.
- Suggest that skill can influence outcomes where outcomes are based on chance.

## 11.4 Responsible Gaming Messaging

Marketing materials shall, where appropriate:

- Include **Responsible Gaming messages**.

- Display the minimum legal gambling age clearly (e.g., “18+”).
- Provide links to the Company’s Responsible Gaming webpages.

Examples of Responsible Gaming messaging:

- “Play responsibly.”
- “Gambling can be addictive — please play responsibly.”
- “For help and support, visit our Responsible Gaming page.”

## 11.5 Protection of Minors and Vulnerable Persons

Marketing and advertising shall not:

- Be directed at individuals below the legal gambling age.
- Be placed in media or environments primarily intended for minors.
- Use **cartoons, youth culture symbols, or child-oriented imagery**.
- Exploit the susceptibilities of individuals known to be at risk of problem gambling.

The Company shall:

- Utilize **age-targeting and content controls** in digital marketing to minimize exposure to minors.
- Conduct periodic audits of marketing placements.

## 11.6 Marketing to Self-Excluded Players

The Company shall:

- Maintain a suppression list of Self-Excluded Players.
- Ensure that Self-Excluded Players do not receive **direct marketing communications**.
- Implement system checks to prevent accidental marketing to Self-Excluded Players.

If a Self-Excluded Player receives marketing communication in error:

- The incident shall be investigated immediately.
- Corrective action shall be taken to prevent recurrence.
- The incident shall be reported to the Responsible Gaming team and documented.

## **11.7 Affiliate Compliance**

All affiliates and marketing partners must:

- Agree to contractual terms that require compliance with this Policy.
- Undergo onboarding due diligence by the Company.
- Be monitored regularly by the Company's Compliance and Affiliate Management teams.

Affiliates must not:

- Engage in misleading or irresponsible marketing.
- Breach content restrictions outlined in this Policy.
- Market to minors or vulnerable persons.

Breaches of these requirements may result in:

- Immediate termination of the affiliate relationship.
- Withholding of payments.
- Reporting to relevant authorities where required.

## **11.8 Staff Training**

Staff involved in:

- Marketing,
- Brand,
- Affiliate management, or
- Public relations

shall receive training on:

- Responsible Gaming principles.
- Legal and regulatory standards for advertising.
- The Company's content restrictions and targeting rules.

Training is provided:

- On induction.
- Annually.
- Following material changes to law or Company policy.

## 12. Staff Training

### 12.1 General Principles

The Company recognizes that **effective Responsible Gaming practices** depend on the awareness, knowledge, and skills of its staff.

Accordingly, the Company is committed to providing **comprehensive Responsible Gaming training** to:

- Ensure that all employees understand their roles and responsibilities.
- Equip staff to identify and respond to signs of problem gambling.
- Promote a consistent and high standard of Player protection across all areas of the business.

### 12.2 Scope of Training

Responsible Gaming training is mandatory for:

- All employees and contractors of the Company.
- All third-party Customer Support providers acting on behalf of the Company.
- All marketing, affiliate, and brand personnel.
- Senior management and Board members.
- Any individual involved in the design, development, or operation of gaming products.

### 12.3 Training Content

Responsible Gaming training shall cover:

#### **General Awareness**

- The Company's commitment to Responsible Gaming.
- Legal and regulatory requirements.
- Player rights and protections.

### **Identification of Problem Gambling**

- Understanding the psychology of gambling addiction.
- Recognizing behavioral risk indicators.
- Recognizing financial and emotional risk indicators.

### **Intervention and Support**

- Communication techniques for interacting with at-risk Players.
- Procedures for offering Responsible Gaming tools.
- Procedures for recommending Self-Exclusion or external support.
- Reporting and escalation protocols.

### **Marketing and Advertising Standards**

- Content restrictions.
- Targeting rules.
- Prohibited practices.
- Responsibilities when working with affiliates.

### **Data Protection and Confidentiality**

- Handling of Player information during Responsible Gaming interventions.
- GDPR and local data protection obligations.

## **12.4 Training Frequency**

Responsible Gaming training shall be delivered:

- Upon **induction** of new employees and contractors.
- **Annually** for all staff.

- **Ad hoc** when:
  - Material changes occur in applicable law or regulation.
  - Material changes occur in Company policy or procedure.
  - Identified gaps or weaknesses are discovered through audit or incident review.

## 12.5 Delivery Methods

Training may be delivered via:

- In-person workshops.
- Live online training sessions.
- E-learning modules with assessment.
- External training providers specializing in Responsible Gaming (where appropriate).

## 12.6 Competency Assessment

- All staff are required to complete an **assessment** following Responsible Gaming training.
- The assessment verifies that the individual:
  - Understands key principles of Responsible Gaming.
  - Knows how to identify and escalate Responsible Gaming concerns.
  - Understands their personal responsibilities under this Policy.

Individuals who do not pass the assessment:

- Must retake the training and assessment before resuming duties related to Player contact or marketing.

## 12.7 Record Keeping

- Training records are maintained by the Company's Compliance department.
- Records include:
  - Date of training.
  - Training content.
  - Attendance records.

- Assessment results.

Training records are:

- Retained for a minimum of **five (5) years**.
- Made available to regulators or auditors upon lawful request.

## **12.8 Continuous Improvement**

The Company's Responsible Gaming training program is:

- Reviewed annually by the Compliance and Responsible Gaming teams.
- Updated to reflect:
  - Emerging best practices.
  - Changes in legal and regulatory requirements.
  - Lessons learned from internal monitoring and audits.

# **13. Record Keeping**

## **13.1 General Principles**

The Company maintains comprehensive records of all activities related to Responsible Gaming to:

- Demonstrate compliance with legal and regulatory requirements.
- Enable effective internal oversight and audit.
- Facilitate continuous improvement of Responsible Gaming practices.
- Ensure transparency and accountability in interactions with Players.

Record keeping practices are governed by:

- The General Data Protection Regulation (GDPR), where applicable.
- The National Ordinance on Games of Chance.
- Curaçao Gaming Control Board (GCB) Guidelines.

- The Company's Data Protection and Privacy Policy.

## **13.2 Scope of Responsible Gaming Records**

The Company retains the following categories of Responsible Gaming records:

### **Player-Level Records**

- Records of Self-Assessment Questionnaire completion (where applicable).
- Responsible Gaming limits set and adjusted by the Player.
- Self-Exclusion requests and processing history.
- Communications with the Player regarding Responsible Gaming interventions.
- Records of interventions (informational, interactive, restrictive).
- Records of third-party reports and resulting actions.
- Account status related to Responsible Gaming (e.g. Self-Excluded, under cooling-off).

### **System-Level Records**

- Behavioral Monitoring alerts and escalations.
- Automated system actions taken based on risk indicators.
- Manual reviews conducted by the Responsible Gaming team.
- Reports of marketing suppression for Self-Excluded Players.

### **Training Records**

- Training attendance records for all relevant staff.
- Assessment results demonstrating staff competency.

### **Oversight Records**

- Minutes of Risk Committee and Board discussions regarding Responsible Gaming.
- Quarterly and annual reports on Responsible Gaming performance.
- Audit reports and corrective actions.

## **13.3 Retention Periods**

Unless a longer period is required by applicable law, the Company shall retain Responsible Gaming records for a minimum of:

- **Five (5) years** from the date of:
  - Account closure.
  - End of Self-Exclusion.
  - Completion of intervention.
  - Termination of employee engagement (for training records).

### **13.4 Data Access and Security**

- Responsible Gaming records are securely stored in encrypted systems.
- Access is strictly limited to:
  - Authorized Responsible Gaming team members.
  - Compliance team members.
  - MLRO and Deputy MLRO.
  - Senior management with a need-to-know basis.
- Access logs are maintained to monitor data access.

### **13.5 Data Sharing and Disclosure**

- Responsible Gaming records may be disclosed to:
  - Regulatory authorities upon lawful request.
  - Law enforcement agencies where required by law.
  - External auditors under confidentiality obligations.
- Records are not disclosed to third parties (including affiliates or partners) without:
  - Player consent, or
  - A clear legal obligation to do so.

### **13.6 Continuous Review**

- The Company's record keeping practices for Responsible Gaming are reviewed annually by:
  - The Compliance team.
  - The Data Protection Officer (DPO), where appointed.
  - The MLRO.
- Updates are implemented to ensure alignment with evolving:
  - Legal and regulatory requirements.
  - Industry best practices.

## 14. Governance and Oversight

### 14.1 General Principles

**Strong governance and oversight** are critical to the effective implementation of the Company's Responsible Gaming framework. The Company maintains a clear governance structure to ensure that:

- Responsible Gaming remains a **strategic priority** at all levels of the organization.
- Oversight is exercised by the **Board of Directors** and relevant committees.
- The Responsible Gaming function operates with **independence and authority**.
- Performance is regularly monitored and reported.

### 14.2 Board of Directors

The Board of Directors has **ultimate responsibility** for ensuring that the Company:

- Operates in full compliance with Responsible Gaming obligations.
- Provides appropriate resources and organizational support for Responsible Gaming.
- Sets a clear tone from the top regarding the importance of Responsible Gaming.
- Reviews and approves this Responsible Gaming Policy and any material updates.

The Board receives:

- **Quarterly reports** from the Responsible Gaming team and MLRO.
- **Annual reports** summarizing Responsible Gaming performance, trends, and improvements.
- **Ad hoc updates** where significant Responsible Gaming issues arise.

### 14.3 Risk Committee

The Risk Committee supports the Board by:

- Reviewing Responsible Gaming risk exposures.
- Monitoring the effectiveness of Responsible Gaming controls.
- Approving risk appetite and risk management frameworks related to Responsible Gaming.
- Ensuring alignment between Responsible Gaming practices and overall risk management.

The Risk Committee meets **quarterly** and reviews:

- Behavioral Monitoring trends.
- Intervention outcomes.
- Self-Exclusion statistics.
- Staff training compliance.
- Emerging Responsible Gaming risks and typologies.

### 14.4 Money Laundering Reporting Officer (MLRO)

The MLRO plays a critical oversight role by:

- Reviewing Responsible Gaming interventions for potential ML/TF implications.
- Ensuring that Responsible Gaming and AML/CFT frameworks are aligned.
- Reporting Responsible Gaming issues that intersect with ML/TF risk to the Board and regulators where appropriate.

### 14.5 Responsible Gaming Team

The dedicated Responsible Gaming team is responsible for:

- Day-to-day implementation of this Policy.
- Monitoring Player behavior and risk indicators.
- Conducting interventions and maintaining Player records.
- Managing Self-Exclusion and limit-setting processes.
- Coordinating staff training on Responsible Gaming.
- Preparing quarterly and annual reports for the Risk Committee and Board.

The Responsible Gaming team operates with **operational independence** from commercial and marketing functions to avoid conflicts of interest.

## 14.6 Compliance Team

The Compliance team supports Responsible Gaming governance by:

- Conducting internal audits of Responsible Gaming processes.
- Monitoring adherence to this Policy.
- Ensuring compliance with applicable laws and regulatory guidelines.
- Coordinating regulatory reporting on Responsible Gaming matters.
- Conducting training for staff across the organization.

## 14.7 Reporting Lines and Communication

The Responsible Gaming team reports to:

- The MLRO for coordination on AML/Responsible Gaming overlap.
- The Head of Compliance for policy implementation and audit.
- The Risk Committee and Board for strategic oversight.

Clear reporting lines ensure that Responsible Gaming concerns can be:

- Escalated promptly.
- Addressed at the appropriate governance level.
- Actioned independently of commercial pressures.

# 15. Policy Review and Continuous Improvement

## 15.1 General Principles

The Company is committed to ensuring that its **Responsible Gaming Policy** remains:

- Fully compliant with applicable legal and regulatory requirements.
- Aligned with **emerging industry best practices**.
- Responsive to changes in Player behavior, technology, and risk typologies.
- Effective in **protecting Players** and promoting Responsible Gaming.

**Continuous improvement** is embedded as a core principle of the Company's Responsible Gaming framework.

## 15.2 Policy Review Cycle

This Policy shall be formally reviewed:

- **Annually**, as part of the Company's compliance and risk management cycle.
- **Ad hoc**, where:
  - Material changes occur in applicable law or regulatory guidance.
  - Material changes occur in the Company's business model, products, or markets.
  - Internal audits or risk assessments identify material gaps or opportunities for improvement.
  - Lessons learned from Responsible Gaming incidents or interventions warrant updates.

## 15.3 Review and Approval Process

Policy review and approval follow this governance process:

- The Responsible Gaming team and Compliance team conduct the **initial review** and draft updates.

- The MLRO reviews updates for alignment with AML/CFT frameworks.
- The Risk Committee reviews and endorses the revised Policy.
- The Board of Directors **formally approves** the updated Policy.

## 15.4 Sources of Continuous Improvement

Continuous improvement is informed by:

- Internal audits and compliance reviews.
- Analysis of Responsible Gaming data and trends.
- Feedback from Players.
- Input from Customer Support and frontline staff.
- Lessons learned from interventions and escalations.
- External Responsible Gaming research and studies.
- Guidance from regulators and industry bodies.
- Engagement with external Responsible Gaming experts and support organizations.

## 15.5 Staff Involvement and Communication

- All staff are encouraged to contribute suggestions for improving Responsible Gaming practices.
- Material updates to this Policy are **communicated to all relevant staff**.
- Training content is updated in line with Policy changes.
- The Company promotes an **open culture** where Responsible Gaming concerns can be raised without fear of reprisal.

## 15.6 Documentation and Audit

- All Policy reviews and updates are documented.
- Records of Board approvals are retained.
- Audit trails are maintained to demonstrate compliance with the Policy review process.

