

RESPONSIBLE GAMING
POLICY
(Internal)

May 2025

PREFACE

PURPOSE

This document's purpose is to provide information as to how the Customer Service Team manages its responsible gambling obligations and provides instructions for account closure and reopening requests.

SCOPE

The information contained in this document includes the following:

- Definition and categorization of gambling-related harm statements.
- Instructions on approach and actions.
- Introduction to the RG tools.
- Key Points and guidelines on how to promote the use of RG tools.
- The process of dealing with customers' requests for account sanctioning.
- Specific account-freezing processes.
- Reopening of closed (frozen) accounts.

1. INTRODUCTION

The platform aims to provide a consistently safe and enjoyable customer experience for all customers. One of the ways to ensure that gambling remains safe for customers is by undertaking Responsible Gambling Interactions in instances where this is appropriate.

2. KEY DEFINITIONS

- **RG Interaction** – An interaction with a customer via call, chat, or email that prompts a customer to think about his level of gambling and spending and provides information regarding RG limitations and specialized support.
- **CSA – Customer Services Associate.**
- **Reactive RG Interaction** – A responsible gambling interaction undertaken by CSAs in direct response to a customer's behavior or statement.
- **Behaviour Matrix** – A non-exhaustive list of behaviors that may be concerning.
- **Account Suspension – Steps taken to prevent a customer from depositing and** gambling or from opening new accounts (includes addition of customer to bad data).
- **Bad data - Banned database, where details of unwanted customers are added to prevent future sign-ups and logins.**

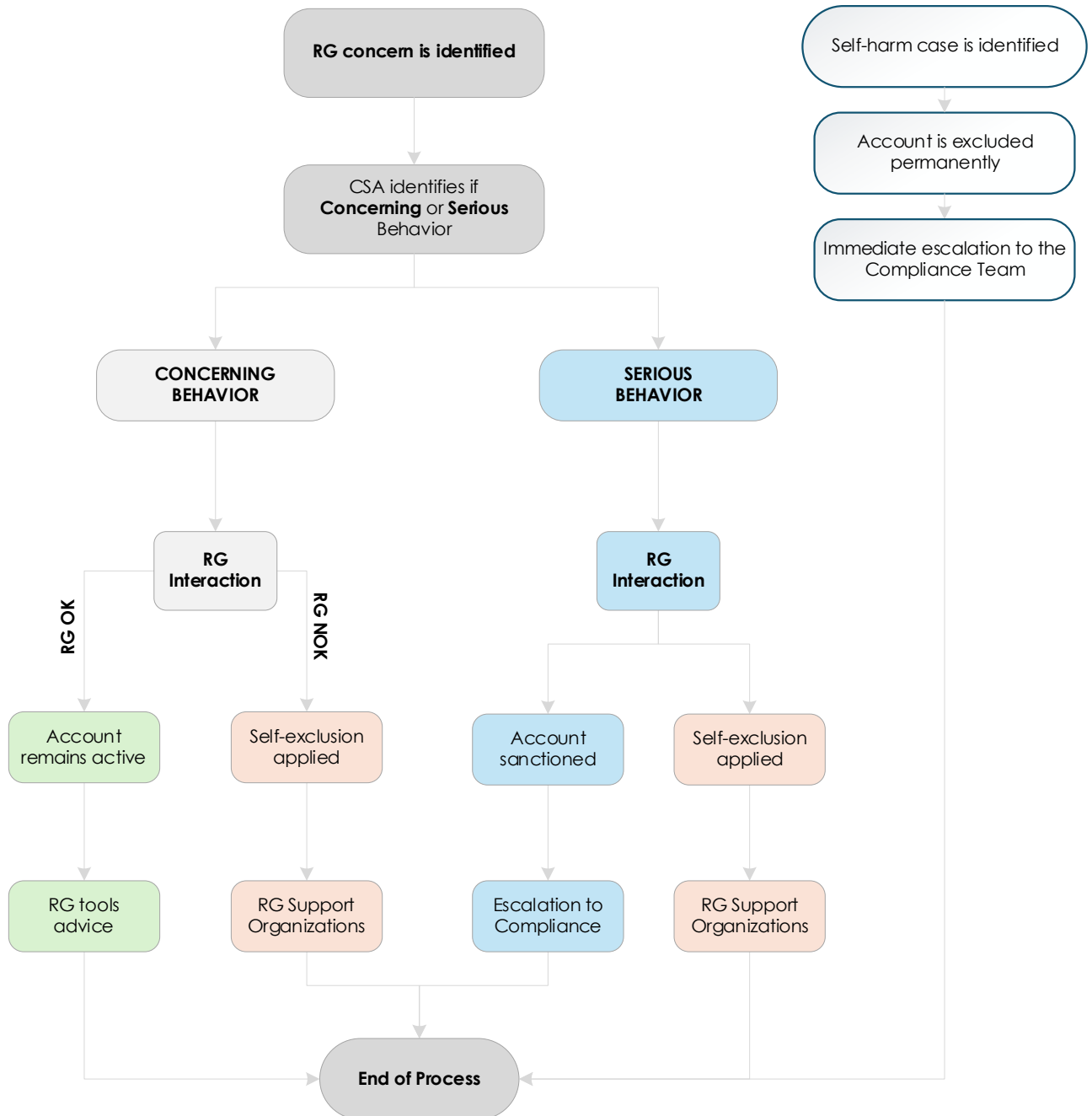
3. WHAT ARE RESPONSIBLE GAMBLING INTERACTIONS

An RG Interaction is **an interaction with a customer** via call, chat, or email that prompts a customer to think about their level of gambling and spending.

It is important to note that a key element of every RG interaction will be the **RG Question**. This question comes in many forms but simply asks a customer whether they are happy with the amount of time and money they are spending on gambling. It is vital to remember to focus the RG Question on the behavior exhibited by the customer or the statement that he is making.

4. RESPONSIBLE GAMBLING – REACTIVE PROCESS

4.1 PROCESS FLOW



4.2 HOW ARE AT-RISK CUSTOMERS IDENTIFIED?

The platform has defined certain behaviors that may indicate that a customer may be suffering gambling-related harm. The platform maintains a **"Behaviour Matrix"** which is a non-exhaustive list regarding behaviors that cover such areas as:

- Customer declarations that they are not in control of their gambling range from very serious statements such as *"I am going to kill myself as I have lost all of my money"* through to more subtle statements such as *"I am tired as I spent all last night gambling"*.

- Consistently requesting free spins or bonuses.
- Repeated requests to close accounts.
- Irrational complaints that games may be fixed.
- Repeated requests to change deposit limits.

The platform cannot define all behaviors that may cause RG concerns but aims to provide extensive training to employees that allows them to identify such behaviors when they interact with customers. The '**Behaviour Matrix**' can be found in **Appendix A**.

4.3 WHAT HAPPENS WHEN RISK BEHAVIOR IS IDENTIFIED?

Behaviors are categorized into two types:

- **Concerning** - Concerning behaviors should immediately trigger a responsible gambling interaction by the CSA who is engaged with the customer in line with the "Concerning Behavior" process detailed below.
- **Serious** - Serious behaviors should immediately trigger a responsible gambling interaction by the CSA who is engaged with the customer and should navigate the situation with the assistance of a Team Manager.

Not all behaviours can be predicted so if at any point, there are any doubts, CSAs should consult with a Team Manager. [Appendix A](#) gives examples of "Serious" and "Concerning" behavior and indicates if customer accounts should be immediately suspended.

4.4 CONCERNING BEHAVIOR PROCESS

1. Where a "Concerning Behavior" is identified on a call, chat, or via email with a customer, the CSA must immediately undertake an RG Interaction.
2. When these behaviors indicate that a customer is spending too much time, too much money, or too much time and money gambling, the appropriate RG Interaction has to be conducted by CSA.
3. RG interactions work better if they are personalized to the customer and the behavior they are exhibiting.
4. Once an RG Interaction has been completed, CSA must record it in Zendesk with the appropriate Correspondence Topic.
5. For all Concerning Behaviors, the account remains unsanctioned if there is a 'Positive' confirmation that the customer is content with their gambling activity.
6. If the confirmation is a 'Negative' confirmation, i.e., that the customer is not happy with their gambling activity, then the outcome of the interaction must be escalated to a Team Manager as a "Serious Behavior". The Team Manager is responsible for applying a self-exclusion tool on the customer's IMS account.

4.5 SERIOUS BEHAVIOR PROCESS

1. Customers who are exhibiting "Serious Behavior" must be escalated to a Team Manager who must sanction the account on the spot (**Self-Exclusion or Suspension**) to prevent further gambling or deposits. A non-exhaustive list of examples can be found in **Appendix A**

2. As soon as practicable the CSA should undertake an RG Interaction with the customer.
3. All self-harm and Serious Behavior cases that do not lead to self-exclusion must be referred to the Compliance team.
4. Customers who are the subject of Serious Behavior cases that do not end with self-exclusion must be informed that their account has been suspended and will not be able to gamble until further review of the account and its activities.
5. The Team Managers are empowered to exclude a customer where they consider that the incident is so serious that it would be irresponsible to allow a customer to continue gambling.

4.6 SELF-HARM BEHAVIOUR PROCESS

A customer could indicate that they are going to harm themselves or others because of their gambling. Such behaviors can be identified either via the support communication channels (email, chat, or call) or received by the Live Casino team.

The process for both scenarios is as follows:

1. The CSA must quickly assess the incident and immediately escalate the case to the Team Manager who is responsible for excluding them for the maximum period of time. An escalation is submitted to the Compliance team for visibility.
2. If the suicidal player has a balance on their account, this balance must be made available for withdrawal and the case is escalated to the Risk and Payment Team for a manual refund.

5. RG TOOLS

5.1 SELF-EXCLUSION

The Self-Exclusion facility is a responsible gambling tool that restricts customers from making any financial or gaming transactions for a specific period of time. The Self-Exclusion facility restricts customers from all gambling activity for a minimum of 1 year and is irrevocable for the duration, as required by CGA. The customer is unable to login to their account for the duration of the self-exclusion tool and the account is not automatically reactivated following its expiration.

If there is an outstanding balance left on the customer's account, then balance is returned automatically to the registered payment method on the account.

In instances where a customer utilizes the self-exclusion facility on the website, the account is automatically sanctioned, and no further deposits or gameplay is allowed.

Immediately after the self-exclusion is placed on the customer's account, a Self-Exclusion Statement is sent to the customer's registered email address, providing relevant information about the details of the self-exclusion, the expiry date, and also additional third-party organizations that provide various support services to customers who are experiencing gambling-related harm.

Reopening self-excluded accounts before the predefined period expires is not possible and the request is declined.

When the selected period expires, the account is not automatically reopened. If a customer wishes to reopen their account, the handling steps from the Account Closure and Self-Exclusion process should be followed. Additionally, before the reopening of the account, there is a mandatory 24-hour cool-off period.

5.2 TIME-OUT

Cooling Off is a CGA-compliant Responsible Gambling tool that prevents customers from engaging in gambling activities for a customizable period, with immediate enforcement and no operator delay.. Customers can apply Time-out to their account through the “**My Account**” section on their online account or by contacting the Customer Service Team via live chat, email, or phone.

The time-out tool offers customers the opportunity to take a break from gambling for the following periods:

- 24 hours
- 1 week
- 2 weeks
- 4 weeks

Immediately after the time-out tool is placed on the customer's account, a time-out statement is sent to the customer's registered email address, providing relevant information about the time-out expiration date. When the selected period expires, the account is automatically reopened, and an additional notification is sent to the customer's registered email address.

In the event a customer would like to remove the time-out tool before the expiration of the predefined period, selected at the customer's end or applied by the Customer Service team, then upon receiving such request, the CSA should perform an RG interaction and confirm with the customer if they feel comfortable restoring access to their account once again and if they are playing within their means. If the customer confirms this, the CSA should signpost the customer to the Responsible Gambling page, available on the website, and advise the customer that there would be a 24-hour cool-off period to reopen the account. The case is then escalated to a Team Manager for reopening after the cool-off period has ended and a follow-up email is sent to the customer, advising them on the status of their account.

5.3 DEPOSIT LIMITS

The deposit limit tool enables customers to limit the amount they deposit on the site for a specific period. The limit can be placed for the following periods:

- Daily
- Weekly
- Monthly

If a customer wishes to decrease their deposit limit, the change is immediately active on the account. If a customer wants to increase their deposit limit, there is an additional **7-day cool-off** period before the change is implemented.

5.4 LOSS LIMITS

The loss limit tool enables customers to limit the amount they lose on the site for a specific period. The limit can be placed for the following periods:

- Daily
- Weekly
- Monthly

If a customer wishes to decrease their loss limit, the change is immediately active on the account. If a customer wants to increase their loss limit, there is an additional **7-day cool-off** period before the change is implemented.

5.5 BET LIMITS

The Bet Limit tool enables customers to limit the amount they bet on the site for a specific period. The limit can be placed for the following periods:

- Daily
- Weekly
- Monthly

If a customer wishes to decrease their bet limit, the change is immediately active on the account. If a customer wants to increase their bet limit, there is an additional **7-day cool-off** period before the change is implemented.

5.6 REALITY CHECK

The Reality Check tool allows customers to receive time-based notifications on the amount of time that they have spent playing on the website. The Reality Check tool must momentarily suspend play and present a pop-up with session duration, win/loss summary, and a prompt to continue or stop, per CGA standards. Customers can apply the tool to their account through the "**My Account**" section on their online account or by contacting the Customer Service Team. The limit can be placed for the following periods:

- 20 minutes
- 40 minutes
- 60 minutes
- 80 minutes
- 100 minutes
- 120 minutes

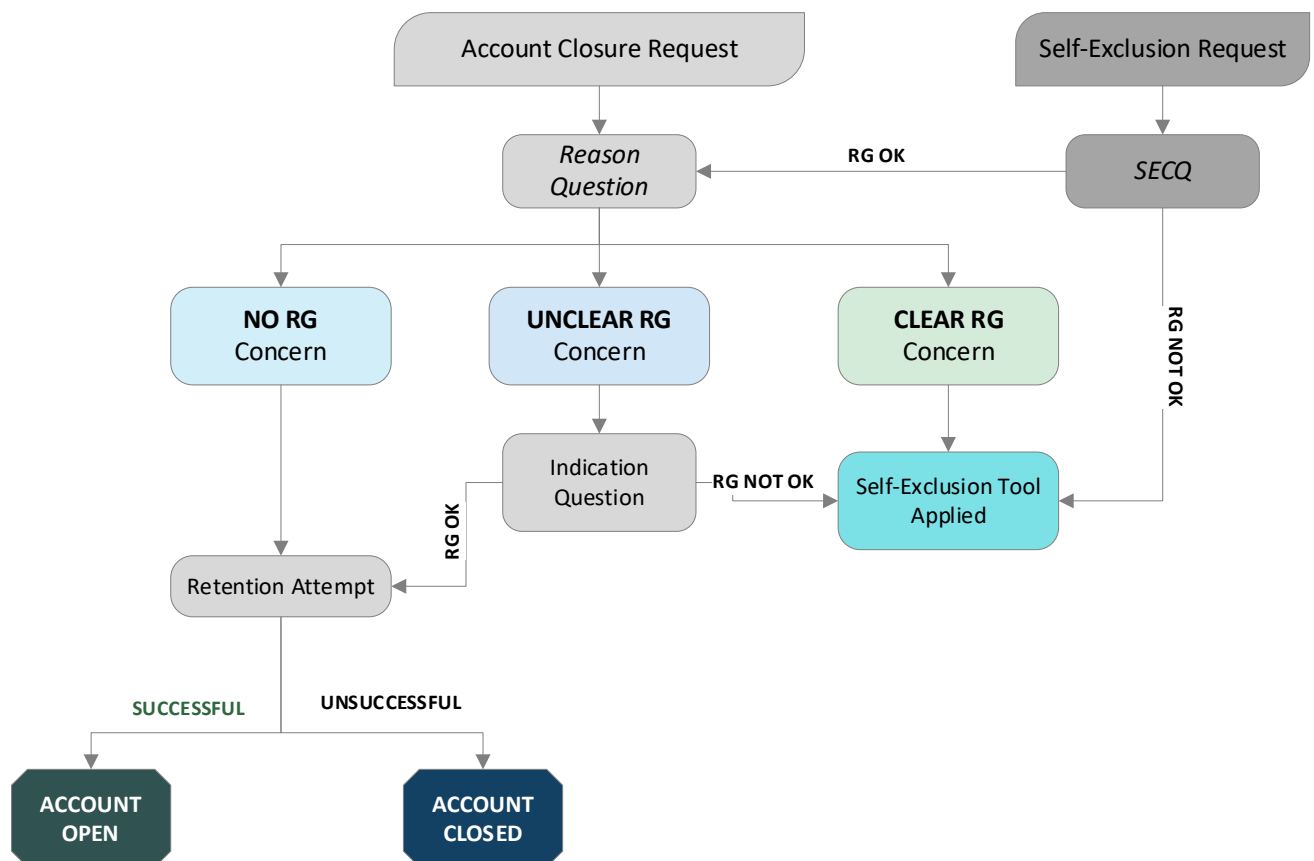
If a customer wishes to decrease their limit, the change is immediately active on the account. If a customer wants to increase their limit, there is an additional **7-day cool-off** period before the change is implemented.

6. ACCOUNT CLOSURE PROCESS

Having account closure and reopening processes that cover most scenarios and reasons is of vital importance from a customer experience point of view. Regular account closure and self-exclusion are the two main types of account closure, and both are described in this document. All statements and questions related to closures and reopening are included in the process. If a customer requests to have their account closed, then the Customer Service Associate (CSA) handling the case must ask the reason question (RQ):

"I am sorry to hear that you want to close your account. Can I ask why as we may be able to fix any issues for you?"

6.1 ACCOUNT CLOSURE PROCESS – FLOW



6.2 NO INDICATION

If there is no indication of gambling-related harm (compulsive behavior), then the CSA must always offer retention. Good customer service care should be used as a retention tool in such cases. The CSA can offer a goodwill gesture bonus in cases where the platform has presented technical failures or adequate problem-solving solutions and, of course, the CSA should use their soft skills as such are of vital importance for a great customer experience.

Examples of account closure requests with no indication:

- I am not happy with the offers on the site, please close my account!
- Why haven't I received my bonus? What a bad customer experience, please close my account!
- I have been waiting for my withdrawal to be processed for a week already! Please process it now and close my account!
- Why are my documents declined again? I am not going to send them again, so please close my account!

If the customer **accepts** the retention offer, then the process ends. The account remains open.

If an account closure request with no indication of compulsive behavior is received via Live Chat or phone and the customer **doesn't want to accept the resolution/retention** provided, then the case is immediately escalated to the Team Manager who must freeze the account and add a note on customer's account. Example:

"Regular account closure as per player's request (name; date)"

- If an account closure request with no indication of compulsive behavior is received through the registered e-mail, the CSA handling the case must ask the reason question (RQ). At this stage, the case is escalated to the Team Manager who freezes the account.
- If an account closure request with no indication of compulsive behavior is received through a non-registered email address, the customer must be advised that they need to contact us from the registered email on the account to proceed with the request. At this stage, the account remains unsanctioned until an answer to the reason question is received.

6.3 UNCLEAR INDICATION

If a customer requests to close their account via any of the approved communication channels and the reason provided indicates that he may be a problem gambler, then the CSA must ask him the Indication Question (IQ).

Examples of account closure requests with unclear indications:

- I am spending a lot of money online.
- I have lost a lot on the website.
- I have deposited a lot of money on this website.
- I am spending too much time gambling.

The following Indication Question (IQ) is used in the described scenarios:

"Do you consider that you bet responsibly on our page?"

- If the customer confirms that they are **NOT** a Compulsive Gambler (CG), but there are still concerns that they may be a problem gambler, then the CSA should offer one of the available responsible gambling tools (whenever applicable). If the customer doesn't want to apply any of these and still wants their account closed, then the CSA must escalate the case to the Team Manager for an account freeze.
- If the customer confirms that they are not betting responsibly, then the account must be immediately excluded. The case should be further handled according to the steps described in 10.3 Clear Indication.
- If such a request for an account closure with unclear indication is received from a non-registered email address, then the customer must be asked to send their request from the registered email address in the account. If the account can be located, then the CSA must escalate the case to Team Managers so they can sanction the account accordingly to prevent any gambling and financial transactions.

6.4 CLEAR INDICATION

If a customer requests to have their account closed due to a reason that indicates that the customer is suffering from gambling-related harm, then the CSA handling the case must immediately escalate the request to the Team Managers so that the account can be excluded.

Examples of account closure requests with a clear indication:

- I have a gambling problem/I'm a compulsive gambler.
- I'm addicted.
- I am not in control of my gambling. I need to stop.
- **Live chat/Phone call** – If during a real-time conversation, the customer's response to the Reason question leads to a clear RG indication, then they should be informed that we are going to take the necessary measures to prevent them from experiencing gambling-related harm. During the interaction, they must be informed that the account will be self-excluded.
- **Abandoned Live chat/Phone call** - If during a real-time conversation, the customer's response to the Reason question leads to a clear RG indication, then they should be informed that we are going to take the necessary measures to prevent them from experiencing gambling-related harm. If, the customer abandons the interaction before we can communicate that the account will be excluded.
- **Clear indication received via email** – In the event the customer provides us with a clear indication that they are experiencing gambling-related harm via email, then the account must be excluded.

Immediately, after the self-exclusion is applied to the customer's account, an automatic email with more information regarding the self-exclusion is sent to the customer's registered email address, containing information about the details of the self-exclusion, the duration, and additionally support organizations that specialize in gambling-related harm support.

7. SELF-EXCLUSION REQUEST

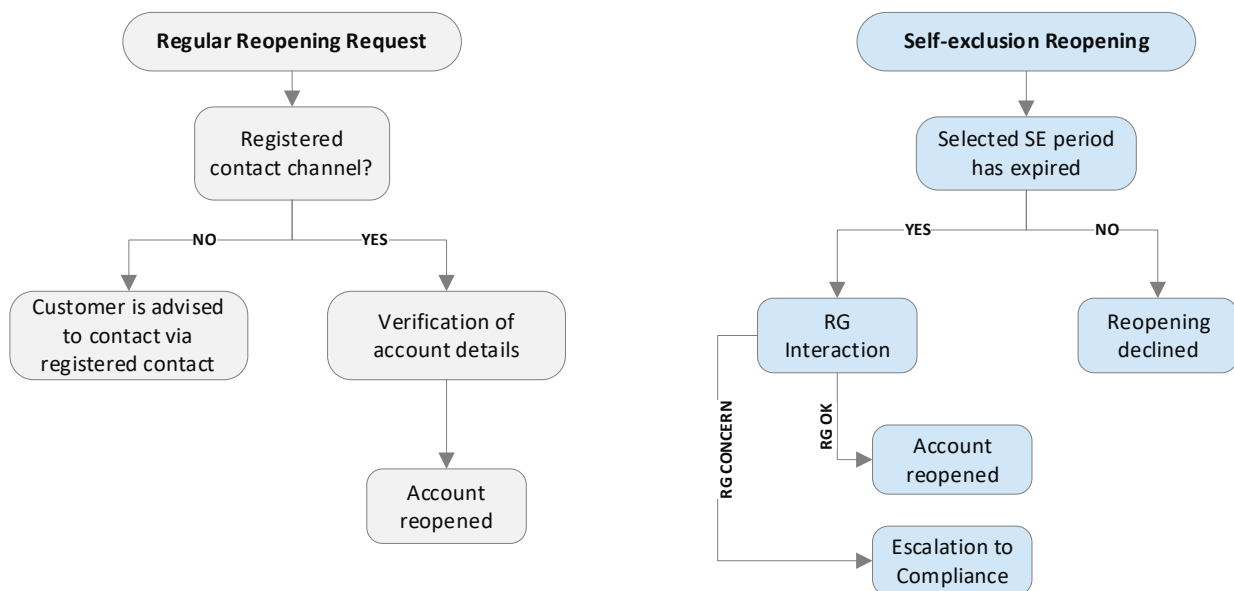
Customer can directly ask the Customer Service to be Self-excluded without providing a reason. In this case, the CSA must ask the customer the **Self-exclusion clarification question (SECQ)**:

"We offer a self-exclusion facility to help those customers who feel that their gambling may be out of control and want our assistance to help them stop. By entering into a self-exclusion agreement, you will be prevented from using your account for a specific period of time?"

- If the customer confirms that they would like to be excluded, the CSA needs to escalate the case to the Team Manager. The Team Manager excludes the account with an immediate effect.
- In the event the customer provides a negative answer to the SECQ the CSA resorts back to the Reason question and proceeds with the regular account closure process if there is no indication of GRH.
- If the customer abandons the chat/phone before an answer to the SECQ is received or the Self-exclusion request is received via email, the Team Manager must immediately sanction the account until a confirmation from the customer is received.

8. ACCOUNT REOPENING PROCESS

8.1 ACCOUNT REOPENING PROCESS - FLOW



8.2 REGULAR ACCOUNT CLOSURE REOPENING REQUESTS

Customers can request the reopening of their accounts at any time. This relates to accounts previously closed without any indication of gambling-related harm. If such a request is received from the registered email address, then the CSA can proceed with the reopening of the account. The request must be escalated to the Team Manager who must update the account accordingly.

If the request for reopening is received via phone, then the CSA must complete a verification of the account details. Once the verification is completed then the CSA must escalate the case to the Team Manager who must reopen the account. In the event the customer fails to complete the verification, then they must be asked for documents to prove their identity.

8.3 SELF-EXCLUSIONS REOPENING REQUESTS

Self-excluded accounts are not automatically reopened after the expiration of the selected period. If a customer wants to reopen their account before the expiration of the initially set period, the request must be immediately declined, and the customer must be informed that reopening their excluded account will not be possible before the expiration of the selected period.

If a customer requests reopening their account after the selected exclusion period has ended, the CSA handling the case must conduct a Return to Gambling (RTG) interaction with the customer, prompting the customer to reflect on their gaming behavior and if they feel comfortable returning to the website, taking full ownership of all financial and gaming transactions. Customers may request reopening only after a written request and a 24-hour cooling-off period post-exclusion expiry, as per CGA reactivation protocol.

If the customer provides a positive RG confirmation, then the account is escalated to the Team Manager who schedules a 24-hour cool-off period before the account can be unsanctioned. Once the 24-hour cool-off period is complete, the customer must be advised to participate in any gaming activities on the platform once again, they need to fully re-register their account once again.

If there are doubts about whether the customer might be suffering from gambling-related harm or not, then the case should be escalated to the Compliance team for review and advice on the next steps.

APPENDIX A. BEHAVIOUR MATRIX

A.1. SERIOUS BEHAVIOR

SERIOUS BEHAVIOUR	EXCLUDE ACCOUNT	SUSPEND ACCOUNT
The customer threatens to harm themselves.	Y	-
The customer threatens an employee.	-	Y
The customer is extremely abusive.	-	Y
The customer is in considerable emotional distress.	-	Y
The customer states that they are a problem gambler.	Y	-
An indication that the customer may be borrowing money to gamble.	-	Y
The customer says they have a problem with their gambling.	Y	-
An indication that the customer has lost money that was intended for another purpose (rent, loans, and so on).	-	Y
The customer indicates they may be having problems with relationships.	-	Y
Any indication that the customer may be feeling depressed or anxious related to gambling.	-	Y

A.2. CONCERNING BEHAVIOR

CONCERNING BEHAVIOUR	SUSPEND ACCOUNT
The customer asks consistently to cancel the withdrawal.	N
Irrational complaints indicating games may be fixed.	N
Consistently asking for bonuses or free spins.	N
Request to increase deposit limits.	N
Stating that deposit limits had been set accidentally.	N
Stating that time-out has been set accidentally.	N
The customer complains they are tired after a long gaming session.	N
The customer consistently closes the account.	N
The customer consistently re-opens the account.	N
An indication that the customer has spent more than they can afford.	N
The customer said he is losing too much money	N

--- END OF PROCESS ---