

Responsible Gambling Policy

AE Group B.V.

Website: www.efbet.net

License No: OGL/2024/216/0606

Curacao Gaming Authority (CGA) Contact: www.gamingcontrolcuracao.org

Effective Date: 01.12.2025

Review Date: In three years or if business needs occur.

1. Policy Statement

AE Group B.V. is committed to responsible gambling as a fundamental licensing obligation under the Curacao Gaming Authority (CGA) Responsible Gaming Guidelines of April 2025. The Operator ensures that gambling is offered strictly as a form of entertainment, while measures are in place to minimize the risks of harm to players, vulnerable persons, and society.

2. Objectives

The objectives of this Responsible Gaming Policy are to prevent underage gambling, to provide players with effective protection tools, and to support individuals who may experience gambling-related problems. The Policy also seeks to ensure transparency in all marketing and operational activities, and to maintain clear governance, oversight, and reporting in accordance with the requirements of the Curacao Gaming Authority (CGA).

3. Responsible Gaming Governance

The Support Team is designated as responsible for carrying out all Responsible Gaming functions within the Operator's organization. The team ensures the implementation of the Responsible Gaming Policy, conducts staff training, monitors player behaviour, oversees partner compliance, and prepares the required reports. The head of the Support Team prepares an annual Responsible Gaming Effectiveness Report and conducts quarterly reviews of intervention data and tool usage. The annual report is submitted to senior management and is made available to the Curacao Gaming Authority (CGA) upon request. The Operator reserves the right to appoint a dedicated Responsible Gaming Officer in the future should the scale or risk profile of the business require it.

4. Age Verification and Player Protection

Gambling services are strictly limited to individuals aged 18 years or older and technical controls are in place to prevent access by underage persons. Age verification is required before a player is permitted to make the first deposit. A full Know Your Customer (KYC) process, including verification of identity and address, is carried out before the player's first withdrawal or when regulatory thresholds are reached.

The Operator also recommends the use of parental control tools, such as FamiSafe or NetNanny, to further safeguard against underage gambling. If an underage person is found to have registered, the account is immediately closed, any deposits are refunded, and all winnings are voided.

5. Player Information and Transparency

5.1 Homepage – Responsible Gaming Section

A clearly visible Responsible Gaming section is available on the homepage. This section includes the Responsible Gaming Policy, information on gambling risks, contact details for support services, license information, and Curacao Gaming Authority (CGA) contact details. A self-assessment test is also provided, enabling players to evaluate their gambling behaviour.

5.2 Player Account – Responsible Gaming Area

Within their account, players have access to a set of Responsible Gambling tools. These include **deposit limits** (daily, weekly, or monthly), with no default limit pre-set. Stricter limits take effect immediately, while relaxed limits take effect only after a 24-hour delay. All limits can be adjusted at any time by the player.

Additional optional tools are available, including loss limits and session/time limits, which players may activate voluntarily. **Reality checks** are also provided in the form of periodic reminders during gameplay (every 30, 60, or 120 minutes) showing session duration and current balance.

All information and tools are provided in English and, where applicable, in the language(s) of the target market, with the English version prevailing in the event of discrepancies. The Responsible Gaming section and player tools are fully accessible to persons with disabilities, including compatibility with screen readers.

6. Responsible Gambling Tools

The Operator provides players with tools to help manage their gambling responsibly. These include **deposit, loss, and time/session limits**, which can be set and adjusted in the player account at any time. Players may also use a **Cooling-Off / Time-Out** option to suspend play for between 24 hours and 6 weeks, or a **Self-Exclusion** option for longer periods of 1 year, 3 years, 5 years, 10 years, or lifetime. During self-exclusion, the account is closed and access blocked, no marketing is sent, duplicate accounts are prevented, and any bets placed after a request but before activation are voided and refunded.

In addition, players receive **reality check reminders** during gameplay at chosen intervals (e.g. every 30, 60, or 120 minutes), showing session time and balance. A **Self-Assessment test**, based on the Gamblers Anonymous “20 Questions,” is also available to provide immediate feedback on gambling behaviour and potential risks.

7. Monitoring and Intervention

Gaming behaviour is continuously monitored for indicators of potential problem gambling, such as unusual deposit patterns, extended play sessions, or repeated reversal of withdrawals. When such risk indicators are identified, the Operator may apply appropriate interventions. These include issuing warnings to the player, applying temporary account suspensions, enforcing mandatory time-outs, or escalating the case for further review by the Support Team. All interventions are documented and form part of the Operator’s Responsible Gaming records.

8. Protection of Vulnerable Persons

The Operator takes active measures to protect vulnerable persons from gambling-related harm. Gambling services are strictly prohibited for minors under the age of 18. Self-excluded players and those identified as vulnerable are also restricted from accessing the platform.

Marketing and promotional activities are never directed at minors, self-excluded players, or individuals showing signs of gambling-related problems. Staff are trained to identify at-risk behaviour and to provide assistance, including information on responsible gambling tools and referral to professional support services where appropriate.

9. Advertising and Marketing Standards

The Operator ensures that all advertising and player communications are conducted responsibly. Marketing materials are not directed at minors, self-excluded players, or vulnerable persons. Gambling is never presented as a source of income, an investment, or a solution to financial problems.

All bonus offers and promotions are communicated transparently with clear terms and conditions. Every advertisement and marketing message includes a visible responsible gaming message and reference to support resources.

10. Staff Training

All employees involved in customer interaction receive training on responsible gambling both at onboarding and on an annual basis. Training covers recognition of problem gambling indicators, appropriate intervention steps, and procedures for escalating cases to the Support Team. Staff are also instructed on how to provide players with information about available responsible gambling tools and external support services.

11. Player Funds Protection

The Operator ensures that player funds are fully protected at all times. All player balances are maintained in segregated accounts, separate from operational funds, to guarantee their availability and to safeguard against misuse.

12. Support and Assistance

The Operator provides players with access to independent organizations that offer professional help for gambling-related problems. Direct links to these organizations are available in the website footer and in the Responsible Gaming section. Players may contact Gordon Moody (www.gordonmoody.org.uk) and GamCare (www.gamcare.org.uk) for free and confidential advice, information, and counselling services.

13. Record Keeping

The Operator maintains complete and accurate Responsible Gaming records for a minimum of five (5) years. These records are securely stored and made available to the Curacao Gaming Authority (CGA) upon request.

14. Third-Party and Affiliate Responsibility

All affiliates and third-party partners must comply with Responsible Gaming standards. Non-compliance may result in termination of the partnership.

15. Complaints and Escalation

Players may submit Responsible Gaming-related complaints to the Operator via the official support channel (support@efbet.net). Complaints are reviewed by the Support Team within a reasonable time, if unresolved, may be escalated to senior management or the Curacao Gaming Authority (CGA).

16. Reporting and Compliance

The Support Team conducts quarterly reviews of Responsible Gaming measures and prepares an annual effectiveness report. The report is submitted to senior management and made available to the Curacao Gaming Authority (CGA). The Policy is reviewed regularly and updated as required to ensure ongoing compliance.

17. Policy History

This Responsible Gaming Policy was adopted under the Curacao Gaming Authority (CGA) Responsible Gaming Requirements in 2025. It is reviewed annually, or earlier if required, and all updates are documented as part of the Operator's compliance records.

AE GROUP B.V.

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