

ApexBet

Responsible Gaming Policy

1. Purpose

This Responsible Gaming Policy sets out the principles, measures, and procedures through which ApexBet Gaming N.V. (hereinafter referred to as “ApexBet”) promotes player protection and mitigates risks associated with gambling-related harm.

ApexBet considers gambling to be a form of entertainment and not a means of generating income. ApexBet is committed to identifying, preventing, and reducing potential negative impacts of gambling through appropriate tools, controls, and intervention measures.

2. Scope and Accessibility

This Policy applies to all players using the ApexBet platform.

This Responsible Gaming Policy is made publicly available through ApexBet’s website, user account interface, or other accessible means.

ApexBet maintains a dedicated **Responsible Gaming section** on its platform, which is clearly visible on the website homepage and user interface. This section serves as the primary access point for responsible gaming information, tools, and support resources.

ApexBet’s Terms and Conditions expressly reference the Responsible Gaming section and inform players how to access responsible gaming tools and information.

3. Protection of Minors and Age Verification

ApexBet strictly prohibits minors from participating in any gambling activities.

To enforce this principle, ApexBet implements the following measures:

1. Players are required to declare that they have reached the legal gambling age during account registration;
 2. Identity verification procedures are applied prior to full account functionality and withdrawals;
 3. Where an account is suspected of being used by a minor, ApexBet will immediately restrict or close the account and take appropriate corrective actions.
-

4. Gambling Risk Information and Player Awareness

ApexBet provides clear and easily understandable information to players regarding the risks associated with gambling, including that:

- Gambling should be regarded as a form of entertainment and not a source of income;

- Gambling involves the risk of losing money;
- Gambling outcomes are based on chance and cannot be predicted or guaranteed.

Risk information is displayed through website content, account interfaces, and policy documentation.

5. Player Self-Assessment

ApexBet provides players with access to self-assessment tools to assist them in evaluating whether their gambling behaviour remains within a healthy and controllable range.

Self-assessment tools may include questionnaires, indicative questions, or references to internationally recognised assessment resources. Players may use the results of such assessments to decide whether to apply gambling limits or seek additional support.

6. Behaviour Tracking and Risk Identification

ApexBet implements **continuous behaviour tracking mechanisms** to identify potential indicators of harmful or problematic gambling behaviour.

Behaviour tracking is performed through a combination of automated system monitoring and manual review. Risk indicators may include, but are not limited to:

- Significant increases in gambling frequency or stake amounts;
- Prolonged or continuous gambling sessions;
- Frequent deposits or unusual funding behaviour;
- Gambling patterns that materially deviate from a player's historical behaviour.

Where potential risk signals are identified, ApexBet applies appropriate intervention measures based on the specific circumstances.

7. Player Control and Limitation Tools

ApexBet provides players with a range of self-management and limitation tools designed to support responsible gambling.

7.1 Deposit Limits

Players may set daily, weekly, or monthly deposit limits within their account.

Once a deposit limit has been reached, further deposits are automatically blocked until the relevant period has elapsed.

Requests to increase deposit limits are subject to a cooling-off period before becoming effective.

7.2 Betting and Net Loss Limits

Players may choose to apply betting limits or net loss limits in order to restrict gambling expenditure over a defined period.

7.3 Cooling-off Periods and Time-outs

Players may apply a cooling-off period or temporary account suspension.

Cooling-off periods are no shorter than twenty-four (24) hours. Once activated, a cooling-off period cannot be revoked prior to expiry. Upon expiry, account functionality is automatically restored.

7.4 Self-Exclusion

Players may choose to self-exclude from ApexBet's gambling services for a defined period or on a long-term basis.

Self-exclusion periods are no shorter than twelve (12) months and can be activated through online self-service functionality without requiring manual approval.

During a self-exclusion period, ApexBet takes reasonable measures to prevent access to gambling services.

8. Intervention Measures and Player Support

Where ApexBet identifies potential gambling-related risks, one or more of the following measures may be applied:

- Informational or warning communications to the player;
- Recommendations to apply responsible gaming tools;
- Temporary restriction of account functionality;
- Termination of the business relationship where appropriate.

All responsible gaming-related assessments, communications, and interventions are recorded within ApexBet's player account management systems to ensure traceability and consistency.

ApexBet shall **not** use responsible gaming assessments or interventions as a reason to delay or obstruct a player's lawful withdrawal requests.

ApexBet provides information on external gambling support organisations and ensures that **clickable links to such external support resources** are available within the Responsible Gaming section and website footer.

9. Employee Training

ApexBet ensures that employees involved in gambling operations, customer support, marketing, and compliance receive responsible gaming training.

Training covers, at a minimum:

- Identification of potentially harmful gambling behaviour;

- Appropriate communication with players;
 - Escalation and intervention procedures;
 - Application of this Responsible Gaming Policy.
-

10. Responsible Gaming in Advertising and Marketing

ApexBet conducts marketing and advertising activities in accordance with responsible gaming principles.

In particular:

1. Marketing is not directed at minors or vulnerable persons;
 2. Advertising does not suggest gambling as a solution to financial difficulties;
 3. Winning probabilities or potential returns are not exaggerated;
 4. Responsible gaming messages are included in advertising materials where appropriate;
 5. Access to the Responsible Gaming section is made available in relevant communications.
-

11. Responsible Gaming Governance and Responsibility

ApexBet has designated the **Compliance Officer** as the individual responsible for overseeing the implementation and effectiveness of this Responsible Gaming Policy.

The Compliance Officer is responsible for:

1. Monitoring the implementation and ongoing effectiveness of this Policy;
 2. Reviewing behaviour tracking and risk identification measures;
 3. Determining appropriate intervention actions or account restrictions;
 4. Reporting responsible gaming matters to senior management on a regular basis;
 5. Driving continuous improvement of responsible gaming controls.
-

12. Policy Review and Management Reporting

This Responsible Gaming Policy is reviewed for effectiveness at least **once every twelve (12) months**.

The results of such reviews are reported by the Compliance Officer to ApexBet's senior management and are used to inform policy updates, resource allocation, and continuous improvement.

13. Website Footer Information

ApexBet ensures that its website footer clearly displays the following information:

- A prohibition notice regarding underage gambling;
- The licensed entity name and registered address;
- Licensing and regulatory information;
- A link to the Responsible Gaming section;

- The Curaçao Gaming Authority (CGA) seal or recognition mark;
 - Clickable links to external gambling support resources.
-

14. Record Keeping

Records relating to responsible gaming assessments, monitoring activities, interventions, and account restrictions are retained in accordance with applicable legal and regulatory requirements and are made available to competent authorities upon request.