

Responsible Gaming procedures

Version 1.1

Article 1: Introduction

1.1 Purpose

This Responsible Gaming Policy is designed to create a safe and controlled gambling environment by implementing measures that minimize the risks associated with problem gambling. It aims to protect both players and stakeholders by promoting responsible gaming practices and offering tools to help individuals manage their gambling behaviour effectively.

The policy is aligned with the guidelines and standards set forth by the Curaçao Gaming Authority, ensuring compliance with local and international regulations under the LOK framework. The policy applies comprehensively to all individuals involved in the gaming ecosystem, including players, staff members, affiliates, and partners. This broad scope ensures that everyone engaged in gaming operations shares the responsibility of upholding safe gambling practices.

Additionally, the policy focuses on providing players with information and resources to make informed decisions, supporting those who may be at risk of developing gambling problems. It includes preventative measures such as setting activity limits, offering self-exclusion options, and establishing procedures for identifying and addressing harmful gambling behaviours.

1.2 Scope

This policy governs all gambling activities conducted by Klavitorix B.V. under the gaming license issued by the Curaçao Gaming Control Board. It applies to a wide range of individuals and entities, including employees, marketing partners, and all other stakeholders who have a role in the gaming operations. These parties are required to adhere to the policy's provisions, ensuring that all involved in the gaming process share responsibility for maintaining a safe and responsible gambling environment.

1.3 Commitment to Responsible Gaming

Klavitorix B.V. is dedicated to ensuring that gambling remains a fun and responsible form of entertainment for all players. To achieve this, we have implemented a combination of mandatory and voluntary safeguards designed to protect vulnerable players from the risks associated with gambling. These safeguards include setting activity limits, providing self-exclusion options, and offering support tools to help players maintain control over their gambling behaviour.

Additionally, we prioritize regular training for our staff and ongoing policy reviews to ensure continuous alignment with changing regulations and industry standards. This proactive approach guarantees that we remain fully compliant and committed to fostering a safe and enjoyable gambling environment.

Article 2: Marketing & Advertising Compliance

2.1 Prohibited Advertising Practices

In line with our commitment to responsible gaming and player protection, we uphold strict guidelines regarding marketing and advertising practices to ensure that all promotional efforts are transparent, ethical, and aligned with industry standards. The following advertising practices will not be permitted:

1. **Misleading Claims About Winning**
Gambling promotions will not make misleading or exaggerated claims regarding the likelihood of winning or the potential rewards. All marketing communications will accurately reflect the odds and nature of the gambling experience.
2. **Marketing to Self-Excluded Players**
Gambling promotions will not target individuals who have voluntarily excluded themselves from gambling activities. Self-exclusion is an important tool for players who choose to take a break or stop gambling entirely.
3. **Marketing to Financially Vulnerable Individuals**
Gambling promotions will not target or appeal to individuals who are financially vulnerable, including those experiencing financial hardships.

2.2 Affiliate & Influencer Compliance

All marketing partners, including affiliates and influencers, must adhere to the advertising guidelines set by the Curaçao Gaming Authority. This ensures that all promotional content is responsible, ethical, and complies with local regulations. Specifically, the following practices will not be permitted in any marketing materials:

1. **Minors or Child-Friendly Characters**
Marketing materials will not include minors or child-friendly characters, as these could appeal to younger audiences and encourage underage gambling. All advertising must target individuals of legal age and must not inadvertently attract a minor audience.
2. **Sexualized Content**
Gambling promotions will not feature sexualized content, imagery, or messaging that may be considered inappropriate, or offensive. All advertisements must maintain a standard of professionalism and respect for the audience, ensuring that the content is suitable for a general audience and does not exploit sexual imagery.
3. **Gambling as a Financial Solution**
Promotions imply that gambling is a legitimate way to solve financial problems. Advertisements should focus on gambling as a form of entertainment, not as a way to achieve financial gain. This approach prevents the exploitation of individuals who may be financially vulnerable and ensures that gambling is presented responsibly.

Article 3: Player Protection & Responsible Gambling Tools

3.1 Access to Responsible Gambling

Ensuring that players are well-informed about the potential risks of gambling and have access to the necessary tools to make responsible decisions is one of the aspects of our commitment to promoting safe gambling practices. To achieve this, the Responsible Gaming Policy will be prominently displayed across multiple areas of the gaming platform. This includes being easily accessible on the homepage, within the Terms & Conditions, and in the footer of all gaming sites and apps.

By ensuring the RG Policy is visible and readily available in these key areas, we are making it easier for players to access critical information at any time during their gambling experience. This transparency encourages players to make informed decisions about their participation in gambling activities and reinforces our commitment to their well-being.

Additionally, players will have direct access to a range of responsible gaming tools. These tools are designed to help individuals manage their gambling behaviour and include features such as setting spending limits, tracking gaming activity, and using self-exclusion options when needed. By providing easy access to these resources, players are empowered to take control of their gambling habits and prevent the risks associated with problem gambling.

3.2 Self-Assessment Tools

To help players assess their gambling habits, we offer self-assessment tools like the GamCare Test and the CAGE Questionnaire. These tools are intended to assist players in identifying potential signs of gambling issues and guide them in taking appropriate actions to manage or resolve any concerns.

The CAGE Questionnaire

Players are encouraged to answer the following questions honestly:

- C – Cut Down: Have you ever felt you should cut down on your gambling?
- A – Annoyed: Have people ever annoyed you by criticizing your gambling habits?
- G – Guilty: Have you ever felt guilty about your gambling?
- E – Eye-Opener: Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be necessary.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

If any concerning behaviour is identified through the self-assessment, it is necessary to recommend that the player explore the responsible gambling tools available.

In line with our dedication to responsible gambling, we make sure that customer support staff are trained to recognize signs of concerning behaviour during player interactions. If any concerning verbal cues are identified in a chat session with the user, the support team will ask the player RG questionnaires to evaluate whether they might be facing gambling-related issues.

The questions aim to identify early indicators of problematic gambling behaviour. Depending on the answers, customer support will offer the necessary guidance, suggest available responsible gambling tools, and refer the player to professional assistance or support services, if needed.

Article 4: Cooling-Off & Self-Exclusion

To set, remove, prolong, or take advice about limits or any other responsible gambling concerns, the user can contact us at the email address: **[email address]**

4.1 Cooling-Off Periods

To encourage responsible gambling, players have the option to take a break from gambling activities, including both gaming and sports betting, through the Cooling-Off limit. This feature is designed to give players a temporary break from gambling, allowing them time to reflect on their behaviour and regain control.

Players can choose from the following Cooling-Off Period options:

- 1 day
- 3 days
- 1 week
- 1 month
- 3 months
- 6 months

Once activated, the Cooling-Off Period will immediately prevent the player from making deposits or participating in any gambling activities across both the gaming platform and sports betting. The cooling-off feature requires no approval and is designed to be a quick and effective tool for players to temporarily step away from gambling. Players will also be excluded from receiving promotional materials and marketing communications.

4.2 Self-Exclusion Process

To support players who wish to take a more extended break from gambling activities, we offer a Self-Exclusion Process. This option allows players to temporarily or permanently exclude themselves from gambling activities across both gaming and sports betting platforms. Players can choose from the following self-exclusion durations:

- 1 year
- 3 years
- Lifetime

Once the self-exclusion is activated, the player will be unable to access any gaming services or place any bets across all brands and domains operated by Klavitorix B.V. This ensures that the exclusion is comprehensive and prevents access to any associated platforms.

To ensure the self-exclusion is effective and cannot be bypassed, any duplicate accounts created by the same player will be blocked, and previously used payment methods will also be restricted. This prevents players from circumventing the self-exclusion by creating new accounts or using alternative payment methods to continue gambling.

4.3 Post-Exclusion Reactivation

Once the self-exclusion period has ended, players who wish to resume gambling activities must follow a clear and structured reactivation process. This ensures that players are fully prepared to return to gambling in a responsible manner. The reactivation process includes the following steps:

1. **Submit a Written Request for Reactivation**
The player must formally request the reactivation of their account in writing. This ensures that the decision to return to gambling is thoughtful and deliberate, allowing the player time to reconsider their commitment to responsible gaming.
2. **Acknowledge Responsible Gaming Reminders**
Upon reactivation, the player is required to acknowledge and review a series of responsible gaming reminders. These reminders will outline the risks of gambling and provide information on the tools available to manage their gambling behavior. By acknowledging these reminders, the player is reaffirmed in their understanding of the importance of responsible gambling.
3. **Complete a Self-Assessment**
Before resuming play, the player must complete a self-assessment to evaluate their current gambling behavior. This could involve using tools like the CAGE Questionnaire or similar responsible gaming assessments. The self-assessment helps determine whether the player is ready to resume gambling safely, or if further precautions are needed.

Article 5: Deposit Limits & Financial Management

5.1 Deposit & Wagering Limits

To support responsible gambling practices and help players manage their spending, players have the option to set daily, weekly, or monthly deposit limits.

- **Deposit Limits:** Players can set limits on the amount they are allowed to deposit into their accounts within a specified period (daily, weekly, or monthly). This ensures players can control their spending and avoid excessive gambling.
- **Wagering Limits:** Players can set limits on the amount they are willing to wager within a specified period (daily, weekly, or monthly) also, it is important to note that wagering limits do not apply to sports betting. This means that players will be able to

set betting limits for gaming but will not be able to apply the same limit to their sports betting activities.

Limit Adjustments:

- **Decreasing Limits:** If a player decides to reduce their limits, the change will take effect immediately, allowing for instant adjustments to their gambling behavior.
- **Increasing Limits:** If a player requests to increase their limits, a 7-day waiting period will be enforced before the new limit is applied. This ensures players have time to carefully reconsider their decision before increasing their limits.

5.2 Other Limits

In addition to deposit and wagering limits, players can set additional limits to help manage their gambling behavior effectively. These limits provide players with greater control over the amount of time and money spent on gambling activities.

- **Loss Limits:** Players can set loss limits to determine the maximum amount they are willing to lose within a given period (daily, weekly, or monthly). Once this limit is reached, they will be unable to continue gambling until the next period begins. Please note, loss limits do not apply to sports betting. This limit is available only for gaming activities in casino, ensuring players can control the amount of money they are prepared to lose.
- **Session Limits:** Players can set session time limits to control the amount of time they spend on gambling activities during a single session. This encourages players to take breaks and manage their time effectively. Please note, session time limits do not apply to sports betting. These limits are specific to gaming activities, helping players avoid prolonged sessions in games.

Article 6: Age Verification & Underage Gambling Prevention

6.1 Legal Age Restriction

Gambling is strictly prohibited for individuals under the age of 18. This restriction is in place to ensure that minors are protected from the risks associated with gambling, and to comply with the legal age requirements in the target jurisdiction. All players must meet the minimum legal age requirement before engaging in any gambling activities, whether in gaming or sports betting.

To enforce this policy, mandatory age verification procedures are applied during the account registration process, as outlined in section 6.2. Any attempt to engage in gambling activities by an underage individual will result in immediate account suspension and the forfeiture of any deposits made.

6.2 Age Verification Procedures

To ensure compliance with the legal age restriction, mandatory identity verification is required for all players during the account registration process. Players must provide valid identification, such as a government-issued ID, passport, or driver's license, to confirm their age before accessing any gambling services.

Additionally, AI-based verification systems or third-party databases may be employed for further validation of a player's identity and age. This added layer of verification helps strengthen the process and prevent any potential fraudulent activity.

If any account is suspected to belong to an underage player, it will be suspended immediately. All steps will be taken to ensure that underage individuals do not gain access to gambling activities, and any funds deposited will be refunded in accordance with the applicable regulations.

6.3 Consequences for Underage Gambling

If it is determined that an underage individual has accessed and participated in gambling activities, the following actions will be taken:

1. Any deposits made by the underage individual will be refunded within a reasonable time frame. However, deposits frozen under Anti-Money Laundering procedures will not be refunded until the issue is fully resolved, in line with regulatory requirements.
2. Any winnings accrued by the underage player will be forfeited. This ensures compliance with regulations that prohibit minors from participating in gambling and benefiting financially from it.
3. A detailed report will be submitted to the Curaçao Gaming Authority within five working days. This report will include:
 - A description of the breach, detailing how the underage individual gained access.
 - The corrective actions taken, including account suspension and refunding of any deposits.
 - Any additional relevant details required by the CGA to ensure full compliance with the law

Article 7: Player Behaviour Monitoring & Early Detection

Customer support teams are responsible for swiftly identifying and addressing any potential gambling-related issues among our customers. This proactive approach is essential to maintaining our commitment to responsible gambling.

7.1 Verbal signs of gambling addiction

It is important to acknowledge that certain behaviors and expressions from customers, while sometimes typical among gamblers, may indicate underlying concerns. For instance, frequent complaints about losses may seem understandable, as losing can be frustrating.

However, while a degree of frustration is expected, certain behaviors may exceed what is considered healthy and typical. An individual who persistently accuses the casino of unfair practices or attributes losses to unfavorable RTP rates provides a clear example of such behavior.

Similarly, requests for bonuses may appear reasonable as customers look for additional opportunities to win. However, a financially stable and responsible customer would not repeatedly request bonuses or attempt to manipulate for free credits.

Expressions of frustration or anger over losses can also be common; however, excessive or extreme anger may indicate that the individual's gambling activity has surpassed their financial boundaries and emotional resilience. Such reactions signal that gambling may be impacting their well-being and that intervention could be warranted to prevent further harm.

These emotions and behaviors serve as indicators that the individual's approach to gambling may be shifting towards problematic territory. While these signs do not definitively indicate addiction, they suggest that the individual could be on a trajectory toward developing a gambling disorder. The intensity and frequency of such behaviors are crucial factors in assessing the level of risk, helping to determine when intervention is warranted. At this stage, it is essential for us, as a responsible operator, to intervene proactively, offering support and resources to mitigate the risk of further harm.

The following verbal behaviors can serve as early indicators of potential gambling issues, based on the DSM-V criteria and training materials.

Although these do not conclusively diagnose addiction, they may suggest a path toward problematic gambling:

Loss of Control

Persistent attempts to control, cut back, or stop gambling, often unsuccessfully. Signs include:

- Expressing feelings of sadness, guilt, shame, or anger linked to gambling outcomes.
- Exhibiting mood swings, feeling guilt or shame, or defensiveness when discussing gambling behaviors.
- Repeatedly requesting to increase or remove limits with a sense of urgency.
- Expressing concerns about gambling away more than what is affordable or planned.
- Worrying about losing winnings or fearing future loss of control.
- Frequently requesting to increase or remove gambling limits, especially with urgency.
- Being involved in self-exclusion programs or excluded from other casinos, indicating a history of gambling issues.

Preoccupation with Gambling

Preoccupation with gambling refers to persistent thoughts or behaviors centered around gambling, including:

- Continuously reliving past gambling experiences or planning future gambling ventures.
- Constantly thinking about ways to acquire money to gamble.
- Frequent contact during unsocial hours, such as late at night or during work hours, which may indicate compulsive behavior.
- Frequent, irritable, or impatient communication regarding transaction disputes, game issues, or account-related problems, which may reflect a customer's inability to stop thinking about their gambling account.
- Demanding immediate attention for bonuses or account checks, especially when the customer is unwilling to wait for standard procedures.

- Gambling longer than initially planned, or increasing the duration of gambling sessions.
- Believing that casino games can be manipulated or controlled by the casino, including the misconception that the casino is making them lose.
- Requests for frequent status checks on account balances, transaction histories, or gambling activities.

Gambling as a Coping Mechanism

Using gambling to alleviate distress or manage emotions. Warning signs include:

- Mentioning any disability, mental disorders, or being on medication, which may affect decision-making or emotional regulation.
- Expressing feelings of hopelessness or despair related to gambling, including references to suicidal thoughts.
- Using gambling as a means of escaping from personal problems or negative emotions.
- Frequently justifying excessive gambling as 'entertainment': Rationalizing high losses or prolonged gambling sessions as just part of the game can be a sign of denial, often seen in the early stages of problematic gambling.

Chasing Losses

Trying to recover losses by gambling more, often leading to further financial strain. Indicators include:

- Using threats, manipulation, or agitation to secure bonuses or refunds.
- Demonstrating emotionally charged, unstable communication.
- Mentioning financial distress unrelated to gambling: Frequently discussing debt or other financial problems may indicate that gambling is exacerbating the person's financial struggles, signaling higher risk.

Concealment of Gambling Behavior

Attempting to hide the extent of gambling involvement. Signs include:

- Becoming defensive or irritable when asked about gambling patterns.
- Providing information that does not match their gambling activity, such as claiming they did not deposit money into their account on a specific day when transactional data shows otherwise.
- Lying about account activity by stating that the account was hacked or that the money lost was not theirs.
- Denying or minimizing the extent of their gambling involvement, even when evidence suggests otherwise.
- Regularly requesting account history reviews: Repeated requests for transaction histories or account statements suggest an attempt to track or justify gambling patterns, which may indicate self-awareness of problematic behavior.
- Seeking reassurance about game fairness or 'guaranteed wins': Asking about game fairness, winning strategies, or believing in "due" wins reflects a lack of understanding of gambling odds, which can indicate the onset of gambling problems.

Impact on Personal Responsibilities

Gambling at the expense of personal obligations or well-being. Indicators include:

- Jeopardizing or losing significant matters, such as job opportunities, educational prospects, or career advancement, due to gambling-related behavior.
- Referring to family problems caused by gambling, including hiding gambling activities from family members or lying about involvement with gambling.

- Mentioning that gambling is causing health problems, such as affecting sleep, eating habits, or overall well-being.
- Expressing concern about the negative impact of gambling on personal relationships or work-life balance.

Financial Risk and Desperation

Mentioning the need to win money to pay off debts, indicating that gambling is being used as a means to resolve financial problems.

- Discussing or hinting at engaging in illegal activities to fund gambling, such as mentioning borrowing money under false pretenses or acquiring funds in questionable ways.
- Insisting on immediate withdrawals, often with a sense of urgency or frustration, signaling a need to regain control over financial losses.
- Relating gambling to financial dependence: Customers who speak about their financial instability being directly tied to gambling losses are likely struggling with their gambling behavior.

Reliance on Others for Financial Support

Seeking financial relief from others due to gambling losses. Red flags include:

- Discussing urgent financial issues or requesting immediate withdrawals to manage debt.
- Mentioning borrowing money from family, friends, or colleagues to fund gambling activities or to recover from previous losses.
- Hinting at desperation to "win back" money and asking for loans or financial support in an urgent manner.
- Pleading for financial help or offering excuses for needing immediate support to cover gambling debts or to keep playing.
- Expressing regret or frustration about being unable to continue gambling without financial assistance, implying that they cannot manage their gambling independently.

Tolerance

Tolerance refers to the need to gamble with higher stakes or for longer periods to achieve the same level of excitement. This can often be observed through changes in behavior, such as an increase in deposit amounts, longer gambling sessions, or larger bets. Verbal indicators include:

- Frequent requests for higher bonuses or enhanced RTP.
- Escalating complaints about losses or frequent contact to criticize outcomes.
- Rationalizing higher stakes with urgency: Constantly requesting a bonus or RTP increase due to an "urgent need" to gamble may suggest a pattern of escalating risk.
- Complaining about losses more often or entering multiple chats to express frustration over lack of winnings.
- Requesting more frequently a higher deposit limit or increasing the frequency of deposits to continue playing at a higher level.
- Complaining about the lack of excitement in their gambling experience, suggesting they need more significant bets or more extended play sessions to feel satisfied.

Withdrawal Symptoms

Showing irritability or restlessness when unable to gamble or when a player tries to reduce or stop gambling. Indicators include:

- Engaging in aggressive or abusive language towards support teams when assistance is delayed.

- Expressing frustration or agitation when trying to reduce or stop gambling.
- Becoming overly frustrated when unable to play: A sense of urgency or distress when play is interrupted or when restrictions are applied may indicate withdrawal-like symptoms.
- Increased frequency of contacts asking for assistance with issues related to account access, deposits, or withdrawals, or removing limits often accompanied by a sense of urgency.

Each of these signs highlights a potential risk that the customer support must carefully monitor to ensure timely, responsible intervention. Identifying and addressing these patterns early can be essential in providing effective support and intervention, reducing the risk of harm for the customer and maintaining a responsible gambling environment.

7.2 Non Verbal signs of gambling addiction

Gambling-related harm can manifest in various forms. The following indicators, while not exhaustive, represent some of the most commonly recognized signs of potential gambling issues:

- Sudden increase in deposits, either in value or frequency. For example, making six or more deposits within a 3-hour period.
- Increase in the number of game sessions and/or the duration of individual sessions.
- Changes in behavior: Notable increase in requests for bonuses, cashback, or other promotional offers.
- Requests to cancel bets that have already been placed.
- Frequent requests to increase or remove Responsible Gambling limits, especially when such requests are made on multiple occasions within a month.
- Requests for the reactivation of previously self-excluded accounts before the expiration of the specified self-exclusion period.
- Extended gaming sessions, such as those lasting over 6 hours.
- Multiple gaming sessions per day occurring at irregular or random times.
- Engaging in gambling during unsociable hours, including late-night or early-morning sessions.
- Frequent addition of multiple payment methods within a short time frame, with varying methods being used for deposits.
- Evidence of chasing losses, such as increasing the deposit size or attempting payments when there are insufficient funds available on the payment card.
- Repeatedly reaching set account limits.
- Increased frequency of refund requests: Consistent requests for refunds, whether related to losses or issues with gambling transactions, may suggest an attempt to regain control or mitigate emotional distress caused by gambling.
- Frequent changes of payment methods, especially following failed deposit attempts, may reflect a desire to continue gambling despite financial barriers.

The list of indicators is not exhaustive, and the support team are trained to continually evaluate a customer's account to ensure that gambling harm is minimized. Where necessary, such as when clear indication of gambling harm has been highlighted by the customer (via chat or emails), the customer support will immediately restrict the customer from playing and escalate the case to the RG team for review.

7.3 Behaviour Tracking

As part of our commitment to responsible gambling, we employ a risk scoring system to monitor and assess player behavior. This system is designed to help identify signs of

potentially harmful or problematic gambling behavior at the earliest stage. The team will adopt various practices to identify potentially suspicious or harmful behavior by players, monitoring multiple factors.

The Risk Scoring System provides an effective means of detecting early warning signs, allowing the team to intervene when necessary and provide support to players before issues escalate. By evaluating these factors, we can assess the level of risk associated with each player's gambling activity and take appropriate action.

The system categorizes players into a multi-tiered risk matrix, ensuring that intervention strategies are proportionate and evidence-based:

- **RG-0: Baseline Monitoring (No Identified Risk)** Users in this category exhibit healthy play patterns that fall within standard behavioral parameters. While no immediate action is required, these users remain under continuous real-time review to detect any sudden shifts in activity.
- **RG-1: Emerging Risk (Minimal, close to no risk)** This tier identifies users showing the earliest signs of potentially developing gambling harm. By detecting minimal-risk markers early, we deploy preventative measures—such as educational prompts to promote sustainable play before behavior escalates.
- **RG-2: Low-risk player.** Users with this RG risk level show higher-risk problem gambling signs of potentially developing gambling harm. By detecting such users early, we can react to such a development before players' behavior escalates further.
- **RG-3: Medium-risk players.** Those players already have one or two problem gambling signs, which shall be addressed. Such users are actively monitored, and interventions happen on every report received.
- **RG-4: High-risk player:** As per rule, RG-4 users have several problem gambling signs and are on the verge of developing gambling harm; such players are monitored even more closely than medium-risk players. Interventions happen every time such a player emerges.

To ensure the integrity of this scoring system, risk scores are not static; they are recalculated in real-time depending on the player's behavior to reflect the most current player behavior.

7.4 Markers of harm

To ensure a proactive safety environment, we utilize a dynamic risk-assessment framework. This data-driven approach allows us to uphold our duty of care while maintaining the integrity of the player experience.

The MOH that we track are as follows:

- Player's Age
- Player's Deposits per day
- Player's average loss last 30 days
- Player's Loss last 30 days
- Player's Game Time per day
- Player's used RG Tools last 7 days
- Player's Recalls per day
- Repeated failed transactions due to insufficient funds
- Unreasonable increased communication with customer support, including requests for bonuses
- Players maxing out a credit card

7.6 Intervention Procedures

If concerning behavior is noticed, the player will be contacted to discuss the situation and offer help. Based on the level of concern, the following actions may be taken:

- **Providing Responsible Gaming Resources:** The player will be given information and links to support services, educational materials, or tools that help manage gambling behavior.
- **Setting Deposit Limits:** The player may have deposit limits applied to control how much they can deposit, either daily, weekly, or monthly, to help manage their spending.
- **Temporarily Suspending the Account:** If further review is needed or the behaviour is worrying, the player's account may be temporarily suspended to give them time to reconsider their gambling habits.
- **Initiating account closure:** If the behaviour shows signs of a more serious gambling problem, we may close the account. This will prevent the player from accessing their account for a set period, giving them time to reflect and seek support.

Article 8: Third-party software

If a player is finding it difficult to manage online betting or gambling, using a bet blocker can be a helpful step toward regaining control. Bet blocker is a tool that limits or restricts access to gambling websites and apps, offering additional protection and support for those who may be struggling.

- [Bet blocker](#)

Article 9: Staff Training & Internal Compliance

9.1 Employee & Customer Support Training

It is essential that all staff members, particularly those in customer support roles, are trained to recognize signs of gambling addiction and other responsible gambling issues. This training is critical in ensuring that our team can identify early warning signs of problematic behaviour and provide the necessary support to players.

To achieve this, training will be conducted using a combination of internal and external resources. The internal training will focus on our specific policies and procedures related to Responsible Gaming. External resources will include specialized training from industry experts, offering updated insights on the latest responsible gaming practices and strategies for supporting vulnerable players.

By utilizing both internal and external training resources, we ensure that our employees are well-equipped with the knowledge and skills needed to assist players effectively and promote a safe gambling environment. This training is essential for providing appropriate guidance and intervention when necessary, fostering a culture of responsibility and care within the company.

9.2 Responsible Gaming team

A dedicated Responsible Gaming team is in charge of overseeing the implementation and ongoing management of the Responsible Gaming policy. This team is responsible for ensuring that the policy is effectively applied across all gaming operations and that responsible gambling practices are consistently followed.

To maintain the effectiveness of the policy, an annual review of the Responsible Gaming policy will be conducted. This review will assess the policy's performance, identify any areas for improvement, and ensure that the policy remains aligned with the latest regulatory requirements and industry best practices.

Following the review, a comprehensive report will be submitted to executive management. This report will include findings, recommendations, and any necessary updates to the policy. In the event that changes are made to the policy, a detailed report will also be submitted to the Curaçao Gaming Authority to ensure ongoing compliance with regulatory standards.

Article 10: Incident Reporting & Regulatory Compliance

10.1 Incident Reporting to CGA

In the event that an underage player or a self-excluded individual gains access to the platform, the following immediate actions will be taken:

1. The account of the underage or self-excluded player will be immediately blocked, preventing any further gambling activity.
2. All deposits made by the player will be fully refunded within two business days. This ensures that no financial harm is caused by the unauthorized access. Any deposits that have been frozen under Anti-Money Laundering policies will follow the appropriate AML process before being refunded.
3. A comprehensive report of the incident will be submitted to the Curaçao Gaming Authority within 5 working days. The report will include:
 - The nature of the breach and how the underage or self-excluded player accessed the platform.
 - The corrective actions taken, such as the blocking of the account and the refund of deposits.
 - Any other relevant details as required by the CGA to ensure full regulatory compliance.

10.2 Audit & Compliance Checks

To ensure transparency and adherence to responsible gaming standards, records of all exclusions will be maintained for a period of 7 years. These records serve as documentation to verify that all actions taken in relation to player safety and compliance are properly tracked and accessible for review.

The company will be ready to provide the records whenever it is requested by CGA.

Article 11: Policy Review & Amendments

11.1 Ongoing Review

This policy will undergo an annual review to assess its effectiveness and ensure it remains aligned with current regulations and best practices. The review process will evaluate the policy's performance, identify areas for improvement, and ensure that it continues to meet the evolving needs of responsible gaming.

Any changes or updates to the policy, based on the review findings, will be submitted to the Curaçao Gaming Authority (CGA) for approval to ensure ongoing regulatory compliance.

Article 12: Legal Compliance & Regulatory Obligations

12.1 Regulatory Oversight

We are fully committed to complying with all regulatory reporting and auditing requirements set by the Curaçao Gaming Authority. This includes ensuring that all required documentation, records, and reports are submitted in a timely manner, in full accordance with legal and regulatory standards. Our goal is to maintain transparency and ensure our operations remain fully compliant at all times.

Article 13: Compliance and Reporting

13.1 Documentation of Activities

We are committed to maintaining accurate and up-to-date records of all self-exclusion activities and actions. These records will be documented in real-time to ensure transparency and compliance with regulatory requirements. This includes tracking the initiation, modification, or termination of any self-exclusion requests.

All records will be securely stored and readily accessible for review. Should the Curaçao Gaming Authority request access to these records, we will provide them promptly to

demonstrate our adherence to compliance standards and to ensure that we are fulfilling our responsibilities in managing self-exclusion.

13.2 Handling of Self-Exclusion and Age Restriction Breaches

We treat seriously all risks and harm that minors may face seeing a person gamble, and accordingly, we strongly advise all adult account holders to exercise strict precautions when sharing devices with underage individuals. To prevent unauthorized access and protect minors from unintended exposure to gambling activities, it is advised that users proactively safeguard their sensitive account information, ensuring that all usernames, passwords, and payment details remain completely secure and strictly inaccessible to minors.

If a self-excluded individual or minor is found to have gained access to gambling activities, we are committed to taking immediate and effective action to rectify the situation and prevent future occurrences. The following steps will be implemented:

1. We will refund all deposited amounts to the player within two business days, except for any funds that are frozen due to Anti-Money Laundering policies. This ensures that the player does not face any financial loss as a result of the breach, while we ensure full compliance with the necessary regulatory procedures.
2. The player's account will be immediately blocked to prevent any further gambling activity. This action ensures that no additional gambling takes place, safeguarding both the player's well-being and the integrity of the gaming environment.
3. We will submit a detailed report to the Curaçao Gaming Authority within five working days. This report will provide a clear explanation of how the breach occurred, including any factors that contributed to the player gaining access to gambling, despite being self-excluded or underage. We will also outline the corrective actions being implemented to prevent such incidents from happening in the future, ensuring that our platform remains in full compliance with regulatory requirements.

Version control

Version 1.0 - 20.03.2025

Version 1.1 - 07.05.2026