

Responsible Gaming Policy

Geeker Technology N.V

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Approved By: Phillip Pistauer

Last Review Date: 01/09/2025

Next Review Date: 01/02/2026

1. Purpose & Scope

This Responsible Gaming Policy sets out our company's commitment to promoting responsible gambling and protecting our players from the potential harms associated with gambling. It applies to all employees, contractors, affiliates, and business partners involved in customer interaction, product development, and marketing.

The policy is designed to comply with the requirements of the **Curaçao Gaming Authority (CGA)** under the **Landsverordening op de Kansspelen (LOK)** and the **Responsible Gaming Policy for Licensed Operators (2025)**.

2. Policy Statement

2.1 Our company is committed to:

- Preventing underage and vulnerable persons from gambling.
- Providing clear information and tools to allow players to control their gambling.
- Identifying and responding to signs of problem gambling.
- Training staff to recognize and address responsible gaming issues.
- Ensuring all marketing and advertising is conducted responsibly.

3. Player Protection Measures

3.1 Age Verification

- We strictly prohibit gambling by individuals under 18 (or higher if required in a player's jurisdiction).

- Verification of age and identity will be performed using official documentation (passport, ID card, or driver's license).
- Accounts failing age verification will be closed, and any balances returned.

3.2 Information & Awareness

- A **Responsible Gaming** page is available on our website, accessible from the homepage.
- It includes:
 - Policy statement
 - Links to support organizations
 - Information on risks of gambling
 - Self-assessment tools
 - Guidance for parents on preventing underage gambling

3.3 Player Tools

Players may at any time request or set:

- Deposit limits (daily/weekly/monthly)
- Loss limits
- Session time limits
- Cooling-off periods (temporary breaks from play)
- Self-exclusion (temporary or permanent)

All limits and exclusions will be implemented promptly and cannot be reversed until the agreed period ends.

3.4 Self-Exclusion Register

- Players requesting self-exclusion will have their accounts suspended and blocked from reopening until the exclusion period expires.
- Marketing communications will be ceased for excluded players.
- Details will be recorded in a secure register.

3.5 Behavior Monitoring

- Player activity is monitored to identify risky or problematic patterns, such as:
 - Frequent deposits and losses
 - Escalating wagers
 - Extended playing sessions
 - When such patterns are identified, we may:
 - Contact the player with safer gambling messages
 - Offer voluntary limits
 - Impose restrictions where necessary
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4. Staff Training

- All customer-facing and compliance staff will receive training on responsible gambling awareness, procedures, and how to interact with at-risk players.
 - Refresher training will be provided annually.
 - Records of training completion will be maintained.
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5. Responsible Marketing

- Advertising and promotions must not:
 - Target minors or vulnerable groups
 - Mislead about chances of winning
 - Encourage excessive or irresponsible play
 - Suggest gambling as a solution to financial or personal problems
 - All affiliates and partners must comply with these rules.
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6. Roles & Responsibilities

6.1 Responsible Gambling Officer (RGO)

- Oversees implementation of this policy.

- Reports at least annually to executive management.
- Liaises with the CGA on responsible gaming matters.

6.2 Compliance Officer

- Ensures that the Responsible Gaming Policy is integrated with licensing, AML/CFT, and data protection requirements.

6.3 All Staff

- Must be familiar with this policy and act in accordance with its provisions.
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7. Monitoring, Reporting & Review

- The policy will be reviewed annually or following significant regulatory changes.
 - Internal audits will assess the effectiveness of measures.
 - Reports on responsible gaming will be submitted to senior management and, where required, to the CGA.
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8. External Support & Resources

Players will be referred to professional support organizations when needed, such as:

- **GamCare** – www.gamcare.org.uk
 - **Gambling Therapy** – www.gamblingtherapy.org
 - **Anonymous Gamblers International** – www.gamblersanonymous.org
 - **GambleAware** - www.gambleaware.org/
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9. Non-Compliance

Failure by staff, affiliates, or contractors to comply with this policy may result in disciplinary action, termination of contracts, or reporting to the CGA.

Responsible Gambling Checks & Interactions

This page outlines when and how to conduct a Responsible Gambling (RG) check during player interactions. It ensures we identify possible risk signs and offer timely support and protections, in line with **Curaçao licensing requirements**.

When to Perform a Responsible Gambling Check

In daily interactions, always assess the communication and previous player history. Trigger a Responsible Gambling Check in the following situations:

Situation	Required Action
Player repeatedly asks for bonuses and complains about lack of wins/losses	Perform RG Check; propose taking a break / placing limitations
Player swearing or showing visible anger over losses	Perform RG Check; propose taking a break / placing limitations
Player reports going through trauma (e.g., mental distress)	Advise on RG; propose break or limitation; offer to place restrictions on their behalf
Player is intoxicated (alcohol, drugs, etc.)	Advise on RG; offer to place restrictions on their behalf - place 24 hour block
Player confirms they're not in control of gambling	Advise on RG; follow internal GP procedure
Player says they cannot afford losses / facing financial harm	Advise on RG; follow internal GP procedure
Player says they're playing to pay bills or support themselves	Perform RG Check; propose break or limitation

Player admits to chasing losses	Perform RG Check; propose break or limitation
Player discloses a change in circumstances: financial or personal trauma	Advise on RG; propose break / limitation; offer to place restrictions

Examples of Change in Personal Circumstances:

- Financial windfall
- Divorce or breakup
- Job loss
- Mental health issues
- Death in the family

Reminder: In all these cases, we must ensure players are in control of their gambling and playing within their means. Always offer **Deposit Limits** or **Player Cooldown Selections** available in their account settings.

Tools to Offer Players

- Deposit Limits
- Casino Cooldown
- Self-Exclusion
- Responsible Gaming Policy - Help Pages

Use clear, calm, and supportive language in all interactions. Our goal is to empower the player to make responsible decisions while offering assistance where needed.