

Responsible Gambling Policy

Seven Days B.V.

Applicable to: Weeekly | Weeekly Rivals | Casino

Prepared in alignment with:

National Ordinance on Games of Chance (LOK), December 2024

CGA Responsible Gaming Policy for Licensed Operators, v1.0 (April 2025)

GCB AML/CFT Regulations, January 2025

Version 1.0

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Issued by: Seven Days B.V.

Curacao Gaming Authority Licence No. [LICENCE NUMBER]

1. Definitions

The following terms carry the meanings given to them in this policy and in the LOK:

Term	Definition
CGA	Curaçao Gaming Authority.
LOK	National Ordinance on Games of Chance (December 2024).
Company / Operator	Seven Days B.V., incorporated under the laws of Curaçao, operating the Platform at weewekly.com under a CGA Gaming Licence.
Platform	The integrated gaming offering operated by the Company at weewekly.com, comprising three products: Weewekly, Weewekly Rivals, and Casino. Where this policy refers to "the Platform" it means all three products collectively; where a specific product is meant, it is named explicitly.
Weewekly	The weekly prize pool raffle and competition product - unless context indicates the Company.
Weewekly Rivals	The competitive wagering leaderboard product operated by the Company.
Casino	The Operator's casino product. All Casino gameplay uses supported cryptocurrencies directly.
Minor	Any person under 18 years of age.
Vulnerable Person	A person who: (i) is under 18; (ii) lacks control over gambling behavior such that addiction is threatened; (iii) has been banned from gambling by force or at own request; or (iv) has been declared bankrupt or has lost disposal of property.
Self-Exclusion	A player-initiated, irrevocable exclusion from all gambling activities under the Operator's licence for a minimum of 12 months.
Cooling Off	A player initiated temporary restriction from wagering activity, minimum 24 hours.
RG Section	The dedicated Responsible Gambling area of the Platform, accessible from the homepage.
Weewekly Coins	Non-withdrawable virtual currency used within the Platform for play activities. Coin wagers are gambling transactions and are excluded from AML/CFT financial transaction thresholds.
Level 1 / Level 2	The two procedural KYC tiers. Level 1 = standard onboarding identity check (applied to every player). Level 2 = enhanced verification (government photo ID + biometric/liveness) triggered by four independent pathways per the AML/CFT Policy: (a) NAf 4,000 cumulative deposits/withdrawals; (b) suspicion of financial crime; (c) any prize win on any platform product; or (d) the player's first withdrawal from the platform, regardless of amount.
PAM System	Player Account Management system used to record all RG interactions.
RG Officer	The designated Responsible Gaming Officer, or in their absence the Compliance Officer (distinct from AML/CFT).

2. Policy Overview & Regulatory Framework

2.1 Purpose

Seven Days B.V. ("the Company") is committed to providing a safe, transparent, and fair gaming environment across all products operated under the Platform. This policy sets out the Company's approach to protecting players - including Vulnerable Persons - from gambling-related harm, in fulfilment of obligations under:

- the National Ordinance on Games of Chance (LOK);
- The CGA Responsible Gaming Policy for Licensed Operators, v1.0 (April 2025);
- The GCB AML/CFT Regulations (January 2025).

2.2 Scope

This policy applies to all activities conducted under the Company's Gaming Licence across all three Platform products:

- Weeekly - weekly prize pool draws with casino-style gameplay;
- Weeekly Rivals - competitive wagering leaderboard contests;
- Casino - real-money casino games.

2.3 High-Risk Business Model

The CGA classifies cryptocurrency-accepting operators as high risk. As such, this policy specifically accommodates the following elevated-risk elements of the business model:

- Cryptocurrency payments;
- Leaderboard-based competition mechanics;
- Raffle Mechanics;
- Virtual currency wagering;
- Global player base with diverse target markets.

Enhanced due diligence and monitoring apply to all elements identified as high risk.

2.4 No Credit to Players

The Company does not, under any circumstances, provide players with any form of credit for the purpose of wagering on any Platform product.

2.5 Responsible Gaming Officer

The Operator must designate a suitably qualified person to fulfil the Responsible Gaming role (the "RG Officer"). Until a dedicated RG Officer is appointed, the Compliance Officer (who is independent of AML/CFT operations) holds this responsibility.

The RG Officer must provide a report to the Operator's management team at least once every 12 months on the effectiveness of this policy, with recommendations for enhancements. Any material changes to this policy must be reported to the CGA.

3. Mandatory Requirements

The following elements are mandatory for operational compliance with the CGA gaming licence and are addressed in detail in the sections referenced below:

1. Age verification (Section 4)
2. Player information and accessibility (Section 5)
3. Player self-assessment tools (Section 6)
4. Behavior tracking and intervention (Section 7)
5. Cooling-off periods (Section 8.1)
6. Self-exclusion (Section 8.2)
7. Operator-initiated exclusion (Section 8.3)
8. Deposit limits (Section 9)
9. Staff training (Section 10)
10. Consumer advertising and marketing compliance (Section 11)

4. Prevention of Play by Prohibited Persons

4.1 Age Verification

The Operator prohibits allowing Minors (persons under 18) to participate in Games of Chance. Robust age verification is a mandatory, continuous obligation.

4.1.1 Registration Checks

At account registration, the Platform must:

- Require the user to enter their date of birth;
- Require the user to confirm, by ticking an unchecked checkbox, that they are 18 or over;
- Perform additional verification sufficient to establish that the individual is not a Minor. Level 2 verification (government-issued identity document plus biometric/liveness check) is performed before the player's first withdrawal, and earlier where any other Level 2 trigger applies per the AML/CFT Policy

4.1.2 KYC Integration

Age verification is embedded within the Platform's two-tier KYC/AML process as set out in the AML/CFT Policy. Level 2 verification (government-issued photo ID plus biometric/liveness check) is triggered by any one of the following four independent pathways - the first to apply governs:

- (a) Threshold trigger: cumulative deposits and/or withdrawals reach NAF 4,000 (running basis). Weeekly Coin wagers are gambling transactions and are excluded from this calculation;
- (b) Suspicion trigger: the Compliance Officer (or any staff member, escalating to the Compliance Officer) detects suspicion of money laundering, terrorism financing, fraud, or any other unusual activity, regardless of transaction value;
- (c) Prize trigger: the player becomes entitled to receive any prize or payout on Weeekly, Weeekly Rivals, or Casino (whether from a paid or free-play entry). No prize will be released before Level 2 verification is complete.
- (d) First-withdrawal trigger: the player attempts to make their first withdrawal from the Platform, regardless of amount. Level 2 verification must be completed before the first withdrawal is processed.

Secondary verification methods (electronic verification, payment validation, third-party database checks, selfie verification) may be used at the Company's discretion but do not replace the government-issued document requirement.

4.1.3 Discovery of a Minor

If the Operator becomes aware at any point that a player is a Minor:

- The account must be closed immediately;
- The civil law implications must be considered, including the potential obligation to refund all deposits and forfeit all winnings;
- The reason for account closure must be clearly communicated to the player;
- Records of the discovery and actions taken must be maintained.

4.1.4 Self-Excluded Players

As part of the same identity verification and account-screening technology that prevents Minors from playing, the Platform must prevent self-excluded players from accessing gambling services. This includes technical measures such as IP blocking, device fingerprinting, login restrictions, and blocking known payment methods. The Operator must also take all reasonable steps to prevent self-excluded individuals from creating new accounts under different credentials. The substantive self-exclusion policy, including duration options, reactivation procedures, and player rights, is set out in Section 8.2.

4.1.5 Record Keeping

Records of all age verification processes and outcomes must be maintained and made available for regulatory review upon request from the CGA.

4.2 Parental Controls

The Operator advises adults who share devices with Minors to take precautions including protecting usernames, passwords, and payment details. The following third-party parental control tools are recommended:

- Net Nanny - www.netnanny.com
- Qustodio - www.qustodio.com
- BetBlocker - www.betblocker.org (free, gambling-specific)
- Gamban - www.gamban.com

5. Player Information and Accessibility

5.1 Responsible Gambling Section

The Platform must maintain a distinct, clearly identifiable Responsible Gambling Section ("RG Section") that is accessible at all times. The RG Section must:

- Be clearly identifiable and accessible from the homepage;
- Contain easily understandable information to allow players to make informed decisions;
- Provide direct access to all RG tools: self-exclusion, cooling-off, deposit limits, and self-assessment;

- Display information on how players may contact the Operator regarding RG concerns (email and live chat);
- Be available in English and in the primary language of each target market; where there is any discrepancy, the English version takes precedence.

5.2 Homepage Accessibility

- A clear, visible link to the RG Section must appear on the homepage of the website and mobile application;
- Contact details for RG support (email and chat) must be displayed;
- The footer of every page must include the items specified in Section 5.4.

5.3 Terms & Conditions

- The RG Section must be explicitly referenced within the Platform's Terms & Conditions;
- The Terms & Conditions must be accessible no more than one click from the homepage;
- Players must be informed about available RG tools, their functionality, and how to use them;
- The Terms & Conditions must include the clause required by Article 5.5 of the LOK: the gaming agreement is governed by Curaçao law and disputes are subject to the jurisdiction of the Curaçao courts.

5.4 Footer Requirements

The footer of the homepage (and application) must contain:

- A clear visual indicator that underage gambling is prohibited;
- The name and registered address of the licence holder;
- The official licence number issued by the CGA;
- A statement confirming CGA regulatory oversight;
- A link to the RG Section;
- Direct links to at least one international and, where available, one local gambling support resource - e.g. GamCare (www.gamcare.org.uk), Gamblers Anonymous (www.gamblersanonymous.org), Gambling Therapy (www.gamblingtherapy.org), BeGambleAware (www.begambleaware.org).

5.5 Support Organisations

The following organisations offer free, confidential support to those affected by gambling harm:

Organisation	Availability	Website
Gambling Therapy	Worldwide / Multilingual	www.gamblingtherapy.org
Gamblers Anonymous	Global peer network	www.gamblersanonymous.org
GamCare	UK-based, international resources	www.gamcare.org.uk
BeGambleAware	UK-based, global resources	www.begambleaware.org

Organisation	Availability	Website
NCPG	US-based, global help directory	www.ncpgambling.org

6. Player Self-Assessment

6.1 Transaction History

Players must be able to access a full record of their betting, wagering, and transaction history - including timestamps - covering at least the previous six months, directly from their account at all times. Longer records may be requested and must be provided within 10 working days (extendable by the CGA where circumstances warrant).

6.2 Self-Assessment Tools

Players must be encouraged to regularly assess their gambling habits. The Platform must make available at least one scientifically recognised self-assessment tool. The following are acceptable and recommended:

6.2.1 Gamblers Anonymous 20-Question Quiz

Available at www.gamblersanonymous.org/20-questions. Players who answer "yes" to seven or more questions may be considered problem gamblers and should seek professional support.

6.2.2 CAGE Questionnaire (Adapted for Gambling)

Players are encouraged to honestly answer the following four questions:

11. Cut Down: Have you ever felt you should cut down on your gambling?
12. Annoyed: Have people annoyed you by criticising your gambling habits?
13. Guilty: Have you ever felt guilty about your gambling?
14. Eye-Opener: Have you ever gambled first thing in the morning to recover losses or steady your nerves?

Score	Indication
0 Yes answers	Low risk of gambling problems.
1 Yes answer	Moderate risk; further assessment may be beneficial.
2+ Yes answers	High risk; further evaluation and use of RG tools is strongly recommended.

The Operator must recommend that any player who identifies problematic behaviour through self-assessment promptly explore the available RG tools, including self-exclusion or cooling off.

7. Behaviour Tracking and Intervention

7.1 Overview

The LOK prohibits the Operator from allowing persons who can reasonably be assumed to be Vulnerable Persons to play Games of Chance. Active monitoring and structured intervention are therefore mandatory.

Operators may use frontline staff, AI/ML tools, and gaming platform features for monitoring. A single indicator does not automatically classify a player as at risk; multiple simultaneous and consistent indicators may be required for intervention.

7.2 Key Monitoring Indicators

Staff and systems must monitor for the following patterns:

- Sudden or unexplained increases in deposit frequency, wager size, or session length;
- Repeated failed transactions due to insufficient funds;
- Repeated reversal of pending withdrawals;
- Inexplicably extended play sessions;
- Increased or agitated contact with customer support, including repeated bonus requests;
- Frequent changes to RG limits;
- Rivals-specific patterns: coordinated play or collusive behaviour designed to engineer Weeekly Rivals leaderboard outcomes;
- Attempts to open multiple accounts to bypass deposit or loss limits;
- Requests inconsistent with the player's stated financial means;
- Player self-identifying as concerned about their behaviour.

7.3 Player Profiling and Risk Assessment

- The Operator must maintain player profiles that incorporate relevant data points to assess risk;
- A risk-based approach must determine the appropriate level of monitoring and intervention for each player;
- All RG interactions - whether player-initiated or Operator-initiated - must be recorded in the PAM system, along with the indicators of concern and all actions taken.

7.4 Intervention Procedures

Where at-risk behaviour is identified, the Operator must:

15. Inform the player of all available RG tools (deposit limits, cooling off, self-exclusion);
 16. Follow a documented escalation protocol which may include:
 - Applying mandatory deposit limits to the account;
 - Temporarily suspending the account pending further assessment;
 - Permanently excluding the player in cases of severe or persistent risk;
 17. Initiate direct contact with the player where behaviour reasonably suggests Vulnerable Person status, directing them to the RG Section and available support.
- *Critical: Under no circumstances may RG measures be used as a pretext to prevent or delay legitimate player withdrawals. Any misuse of protective interventions for financial gain constitutes a breach of licence conditions.*

8. Cooling Off and Self-Exclusion

Two mechanisms must be available to players at all times via the RG Section:

Feature	Cooling Off	Self-Exclusion
Wagering	Prohibited (all or selected verticals)	Prohibited - all gambling activity blocked
Deposits	Blocked	Blocked
Withdrawals	Permitted	Permitted, subject to AML/CFT and identity verification requirements
Login	Permitted	Account closed - login disabled
Scope	Current brand, or all Operator brands (player selection)	All brands under Operator's licence
Duration	Minimum 24 hours	Minimum 12 months
Changes	May be made more restrictive only	Irrevocable for selected duration
Ante-post bets	Remain active	Voided and refunded
Marketing	Player may opt out	All marketing blocked automatically
Activation	Online, self-service (email/chat fallback within 24 hrs)	Online, self-service (email/chat fallback within 24 hrs)
Reactivation	Automatic at expiry	Player-initiated written request only

- *Players must not be guided or influenced toward one option over the other. No bonuses, promotions, or reassurances may be offered when a player initiates either tool.*

8.1 Cooling Off

8.1.1 Duration Options

- 24 hours
- 7 days
- 1 month
- 3 months

8.1.2 Player Selections

Players must select:

- Duration (mandatory);
- Marketing opt-out (mandatory);
- Brand scope - current brand only, or all Operator brands (optional at Operator's discretion);
- Vertical scope - all gambling activity, or specific product verticals (optional at Operator's discretion).

8.1.3 Implementation

- Restrictions take effect immediately upon selection;

- For 1-month or 3-month periods, a neutral online confirmation check is permitted: e.g. "You wish to cool off for one month. Please confirm." No further friction is allowed;
- Player funds remain accessible for withdrawal during cooling off;
- Account remains active but gambling features are disabled;
- No bonuses, free play, or promotional material may be sent during the cooling-off period to players who have opted out of marketing;
- Cooling-off periods expire automatically; accounts are reactivated without further action required by the player.

8.2 Self-Exclusion

8.2.1 Overview

A player who voluntarily requests exclusion in writing must be excluded for a minimum of 12 months from the date of the request. During the exclusion period, the exclusion is irrevocable.

8.2.2 Duration Options

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime / Indefinite

8.2.3 Implementation

- The player must be able to initiate and complete the self-exclusion process entirely online without email communication or Operator approval;
- Restrictions take effect immediately upon confirmation;
- A single neutral online verification check is permitted: e.g. "You have chosen to self-exclude for 5 years. Please confirm.";
- The Operator must not question the decision, offer bonuses, or delay the process;
- The account is closed; the player can no longer log in;
- All marketing and direct advertising is blocked immediately and permanently for the exclusion period;
- Ante-post bets and unresolved wagers are voided and refunded, subject to AML/CFT regulations;
- Active wagers (including any in-progress Rivals contest entries) are voided and the player's stake refunded, subject to AML/CFT and identity verification requirements;
- The Operator must have robust measures to detect duplicate accounts and prevent self-excluded players from registering under different credentials (including IP blocking, device fingerprinting, and payment method blocking);
- Known payment methods used by self-excluded players must be blocked for the duration of the exclusion period.

8.2.4 Reactivation

- After the exclusion period ends, the player must submit a written request (by email or chat) to reactivate their account;
- The Operator must not contact the player proactively to prompt reactivation;
- Reactivation requires identity re-verification and is subject to compliance review;
- Records of self-exclusions must be retained in accordance with the applicable retention periods (minimum 5 years, per the GCB AML/CFT Regulations).

8.3 Operator-Initiated Exclusion

The Operator may exclude a player as a high-risk protective measure if:

- The player displays persistent or severe problematic gambling behaviour;
- The player attempts or engages in criminal activity through the Platform.

Operator-initiated exclusions must not be used solely on the basis of the amount of a player's winnings. All such exclusions must be formally documented and records retained for at least 5 years. The CGA may request these records at any time.

9. Player Limits

9.1 Deposit Limits

The Platform must offer players the ability to set daily, weekly, and monthly deposit limits:

- Once a limit is reached, no further deposits are accepted until the period resets;
- Any request to increase a limit is subject to a 24-hour waiting period before implementation;
- Any request to decrease a limit (making it more restrictive) takes effect immediately;
- Active wagers placed prior to a limit being set are unaffected.

9.2 Other Limits

Based on the Operator's risk profile and player demographics, the following additional limits may also be implemented:

- Loss limits (daily, weekly, or monthly);
- Session time limits;
- Wager limits per bet.

9.3 Exceptions Relating to Active Wagers

Where a deposit, loss, session, or wager limit is activated while a player has an unresolved ante-post bet or an active contest entry:

- The new limit applies immediately to all new wagering;
- The active wager is permitted to complete and is not voided;
- No further wagering of any kind is permitted until the active wager resolves.

Self-exclusion and cooling-off are handled separately under Section 8 and may result in active wagers being voided and refunded.

10. Staff Training and Readiness

The Operator must provide annual, role-appropriate permanent education to staff. All customer-facing staff, VIP management, and marketing personnel must be trained before launch and annually thereafter.

10.1 Training Content

Training must cover at minimum:

- Recognising signs of gambling distress, including agitation, aggression, financial desperation, and patterns of problematic play;
- Conducting sensitive, structured conversations with at-risk players;
- Directing players to appropriate RG tools and external support resources;
- The legal obligations of the Operator under the LOK and CGA RG Policy;
- Responsible advertising practices;
- Anti-money laundering awareness (appropriate to role);
- Platform-specific escalation procedures.

10.2 Documentation

Training completion must be recorded and made available to the CGA upon request. Training must be reviewed and updated annually.

11. Consumer Advertising and Marketing

Marketing and advertising activities - including bonuses - do not encourage excessive gaming, are not misleading, and do not target Vulnerable Persons.

11.1 Prohibited Practices

- No targeting of Vulnerable Persons, Minors, or self-excluded players in any marketing material;
- No portrayal of gambling as a financial investment or a solution to financial difficulties;
- No misrepresentation of skill versus chance;
- No emotional manipulation - gambling must not be portrayed as a remedy for emotional, mental, or financial problems;
- No use of Minors in marketing content;
- No explicit sexual, pornographic, or violent imagery;
- No linkage between gambling and drugs, alcohol, smoking, or similar harmful behaviours;
- No re-engagement communications to self-excluded players.

11.2 Bonus and Promotion Standards

- All bonuses and promotions must be communicated transparently with clearly stated terms and conditions;
- Bonuses must not be used to encourage excessive gambling or to contact players who have activated cooling-off or self-exclusion;
- Free-play mechanics (Weeekly Coins distribution, free entries) must not be designed or communicated in a manner that circumvents RG protections.

11.3 Responsible Gambling Messaging

- All advertising and promotional material must include a clearly visible responsible gambling message or slogan;
- The RG message requirement applies to all channels: digital, social media, print, influencer partnerships, and affiliate campaigns.

11.4 Third-Party Responsibility

- The Operator is responsible for all materials provided to affiliates, representatives, sponsors, ambassadors, and paid social media influencers;
- All contracted third parties must be made aware of this RG policy and required to adhere to it;
- Violations by third parties may result in removal from affiliate or partnership programmes.

12. Enhanced Responsible Gambling Measures

Given the Operator's high-risk business model (cryptocurrency acceptance, global player base, leaderboard wagering mechanics), the following enhanced measures are implemented or considered:

12.1 Internet Filtering Tools

The Platform provides links to the following third-party blocking tools:

- BetBlocker - www.betblocker.org (free)
- GamBlock - www.gamblock.com
- Gamban - www.gamban.com

12.2 Direct Player Interaction

- Automatic or manual pop-up notifications may be triggered by concerning behaviour patterns;
- Notifications must include a link enabling the player to contact a trained RG professional;
- Where behaviour reasonably suggests a Vulnerable Person, direct contact must be initiated, directing the player to the RG Section and available tools.

12.3 Game Outcome Transparency

In-house games across Weeekly, Weeekly Rivals, and Casino operate under a provably fair scheme. Players may independently verify game outcomes using the public per-game verifier provided on the Platform. The Company considers transparency of game outcome generation an integral part of responsible gambling, reinforcing player

trust and reducing reliance on operator assertions in the event of dispute. Provably fair transparency does not substitute for player self-control measures or for the responsible gambling tools set out elsewhere in this policy.

13. Platform-Specific Considerations

13.1 Weeekly - Raffle Platform

The Company acknowledges that both bundle-based and Coin-based play can give rise to problematic behaviour patterns. Accordingly:

- Level 2 KYC is required upon any prize win (whether from paid or free-play entry); no prize is released before verification is complete;
- Where the mechanic awards additional raffle tickets based on cumulative Coin wagering activity, the rules must be clearly disclosed to players and the mechanic must not be designed in a manner that exploits compulsive engagement;
- Weeekly Coins reset at the conclusion of each weekly draw. The Company will not market the reset cycle in a manner that pressures players to spend Coins compulsively before reset or to upgrade memberships to avoid Coin loss; this risk is included within behavioural monitoring;

13.2 Weeekly Rivals - Competitive Wagering

All mandatory RG requirements apply in full. Additional considerations:

- The leaderboard and fixed-countdown format create an environment with elevated engagement risk; behaviour tracking thresholds are calibrated accordingly;
- Players must be made aware of the cumulative cost of re-entries;
- Level 2 KYC is required upon any prize win from Weeekly Rivals.

13.3 Casino

Casino includes both in-house and third-party game content. All mandatory RG requirements apply in full:

- All self-exclusion, cooling-off, deposit limit, and behaviour-monitoring obligations apply equally to Casino gameplay;
- Level 2 KYC is required upon any prize win on Casino;
- The Company is responsible for ensuring that RG tools operate correctly across both in-house and third-party Casino content;
- Casino wagering generates Weeekly Coins towards the Weeekly raffle as a loyalty mechanic. The Company acknowledges that wagering-linked reward mechanics can elevate engagement risk and includes this pattern within behavioural monitoring (Section 7); marketing of the mechanic must not be designed or communicated in a manner that encourages excessive Casino wagering.

13.4 Cryptocurrency Payments

The Platform accepts USDT and USDC only. These stablecoins are held segregated via Fireblocks and are not co-mingled with operating funds. The Company does not accept BTC, ETH, or other volatile cryptocurrencies at launch.

- All deposit, withdrawal, and self-exclusion payment-blocking procedures apply to stablecoin transactions across all three Platform products;
- AML monitoring thresholds apply in accordance with the GCB AML/CFT Regulations;

14. Complaints and Dispute Resolution

Players may submit complaints to the Company through the channels and process set out in the Player Complaints Policy. Complaints relating to Responsible Gaming are subject to an accelerated track as set out below.

14.1 Responsible Gaming Complaint Track

Complaints relating to Responsible Gaming - including the targeting of Vulnerable Persons, the availability or timely implementation of self-exclusion or cooling-off measures, or the mandated consequences of those measures - are subject to an accelerated track:

- Acknowledgement within 2 days of receipt;
- Target resolution within 5 business days;
- Maximum extension of 2 weeks (with prior written notice to the player);
- All communications on Responsible Gaming complaints must be handled by a human member of staff - AI-assisted responses are not permitted for this category.

14.2 Standard Complaint Track

- Acknowledgement within 1 week of receipt;
- Final ruling within 4 weeks (extendable once by 4 weeks with prior written notice);
- AI may assist with standard complaint handling, subject to monitoring for consistency and fairness.

Complaint Type	Acknowledgement	Resolution Target	Max Extension
Responsible Gaming	Within 2 days	5 business days	+2 weeks
All other complaints	Within 1 week	4 weeks	+4 weeks

15. Record Keeping and Reporting

- All RG interactions, interventions, and outcomes must be recorded in the PAM system;
- Self-exclusion records must be retained for a minimum of 5 years;
- All age verification records must be retained and made available to the CGA on request;
- Incident reports involving RG breaches must be filed with the CGA within 24 hours;
- Amendment reports must be submitted to the CGA twice yearly (by 15 June and 15 January);

- The RG Officer must submit an annual effectiveness report to senior management;
- Annual financial statements must be submitted to the CGA by 30 June each year.

16. Policy Review and Updates

- This policy will be reviewed at least annually by the RG Officer;
- Any material changes must be reported to the CGA;
- The policy must be uploaded to the CGA portal each time it is updated;
- This policy will be updated to reflect any new CGA guidelines, LOK amendments, or changes to the Platform's product or risk profile.

Version	Date	Author	Status
1.0	May - 2026	Weeekly Team	Active On License Grant

This policy is effective as of the date of the Operator's CGA Gaming Licence being granted and supersedes all previous versions.