

Responsible Gaming policy

Version 1.01

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Article 1: Introduction

1.1 Purpose

The Responsible Gaming Policy establishes a structured framework to ensure that gambling activities are conducted in a way that prioritises player safety and stakeholder welfare, including staff, partners, and affiliates. The core aim is to foster responsible, secure, and enjoyable gaming experiences while proactively addressing potential risks linked to gambling addiction.

This policy seeks to cultivate an environment in which players are well-informed about gambling-related risks and are equipped with effective tools and guidance to manage their gambling behaviour. This includes implementing support mechanisms for individuals potentially vulnerable to gambling harm.

The policy aligns with the directives and regulatory standards issued by the Curaçao Gaming Authority, particularly under the LOK framework. Accordingly, it ensures full adherence to local legislative requirements, promotes player safety, and maintains integrity across all online gambling practices.

The policy applies to all participants engaged in gaming operations under Apalonik B.V., ensuring that every involved party shares in the responsibility to uphold responsible gambling principles. The commitment extends to active collaboration with regulatory bodies and industry participants to continually enhance responsible gambling strategies.

The document is intended to minimise the risk of gambling-related harm, prevent access to gambling by minors, and offer proactive support to individuals showing signs of problematic behaviour. It also outlines identification protocols, gambling activity limitations, and self-exclusion procedures aimed at safeguarding vulnerable groups.

1.2 Scope

This Responsible Gambling Policy applies to all gaming and betting activities governed by the Curaçao Gaming Control Board. The license confirms that operations meet the established legal and regulatory benchmarks in Curaçao. Accordingly, all gaming services licensed under this authority must comply with the principles outlined herein.

This policy is binding for employees, affiliates, marketing partners, and external vendors engaged in delivering or promoting gaming services. Employees are expected to uphold these standards in daily operations, and partners are required to incorporate responsible gambling values into customer interactions.

Additionally, this policy covers any third party or service provider involved in the broader gaming ecosystem. By applying these responsibilities across all involved actors, the policy ensures a unified and coordinated approach to player safety, regulatory compliance, and responsible gaming promotion.

In summary, this policy fosters a holistic and inclusive approach to responsible gambling, making sure all contributors are aligned in their duty to protect players and maintain ethical gaming conduct.

1.3 Commitment to Responsible Gaming

We are strongly dedicated to ensuring that gambling remains a secure and entertaining leisure activity for all users. We acknowledge the associated risks and the need for an atmosphere that promotes self-awareness and personal control among players.

To support this, we have developed a robust set of protective measures, including customizable play limits, self-exclusion features, and tools to track and manage gambling behaviour. We also aim to support individuals at risk of gambling problems by providing access to resources and maintaining a consistent focus on prevention.

In addition, our team undergoes ongoing training on responsible gambling practices. This training ensures that staff are equipped to identify and respond appropriately to signs of gambling-related harm. Continuous learning keeps our staff up-to-date with industry standards and emerging risks.

We are also committed to periodically reviewing our Responsible Gambling Policy and procedures, adjusting them as necessary to reflect new regulations or identified risks. As the industry landscape changes, we will ensure our policies evolve to maintain a safe and compliant gaming environment.

Article 2: Age Verification & Underage Gambling Prevention

2.1 Legal Age Restriction

Gambling services are strictly limited to individuals aged 18 years and above. This age requirement ensures that only adults legally eligible to make informed decisions may participate.

This restriction helps to protect minors from the negative effects of gambling, maintaining the integrity and responsibility of our services. We are deeply committed to preventing access by underage users and implementing stringent checks to confirm age at the time of registration.

2.2 Age Verification Procedures

To enforce compliance with the legal age threshold, we have implemented rigorous age verification processes. These procedures are designed to verify the identity and age of all players before they are allowed to participate in any gambling activities.

Upon registration, players will be required to provide mandatory identity documents, such as a valid ID card, passport, or driver's license. These documents are used to confirm that the individual meets the minimum legal age requirement to gamble.

Alongside manual identity verification, we may utilize AI-driven solutions and third-party databases to further validate player age.

If any discrepancies or suspicions arise regarding age, the account is promptly suspended pending investigation. Should the player be confirmed as underage, the account will be permanently closed, all winnings will be voided, and any deposits refunded in line with regulations.

2.3 Consequences for Underage Gambling

We apply a strict zero-tolerance policy for underage gambling. If a breach occurs, we will enforce the following:

1. Refund of Deposits – Any deposits made by the underage individual will be fully refunded, except in cases where funds are frozen under AML policies or if fraudulent activity is suspected. This ensures that minors do not suffer financial loss while preventing potential misuse of funds.
2. Forfeiture of Winnings – Any winnings accumulated by an underage player will be automatically forfeited. This rule is in place to discourage attempts by minors to participate in gambling activities and to comply with regulatory requirements that prohibit underage individuals from benefiting from gambling.
 - Deposit Refunds – Deposits made by the underage individual will be reimbursed, unless withheld due to AML suspicions or fraud concerns.
 - Winnings Forfeiture – All accumulated winnings will be automatically forfeited in accordance with licensing obligations.
 - Regulatory Notification – A comprehensive report will be prepared and sent to the Curaçao Gaming Authority within five business days, detailing:
 - a. The nature of the breach (how the underage gambling was detected).
 - b. The steps taken to identify and block the underage account.
3. The corrective measures were implemented to prevent similar incidents in the future.

Article 3: Player Protection & Responsible Gambling Tools

3.1 Access to Responsible Gambling Information

The Responsible Gambling Policy is made readily available across the platform to ensure that all players remain well-informed of their rights and responsibilities. This ensures they can conveniently locate key information related to responsible gambling whenever necessary.

1. Visibility Across Platform – The policy is accessible in the following key locations:
 - a. The homepage of a gaming website and/or application.
 - b. The Terms & Conditions section, where players agree to the rules and policies before engaging in gambling activities.
 - c. The footer section of the site or app, ensuring presence on all pages for quick reference
2. Immediate Availability of Player Tools – Players are granted instant access to a suite of responsible gambling features designed to help them maintain control over their gambling behaviour. These include:
 - a. Deposit Limit, enabling users to set how much they can deposit
 - b. Wagering Limit, letting users place a cap on betting amounts
 - c. Loss Limit, helping players manage acceptable financial losses
 - d. Session Limit, to help manage time spent gambling
 - e. Cooling-Off Period, for temporary pauses in gambling activity
 - f. Self-Exclusion, for voluntary restriction, permanently or temporarily, from gaming access

3.2 Self-Assessment Tools

To help players evaluate their gambling patterns, we provide self-screening tools such as the GamCare assessment and the CAGE Questionnaire. These instruments support early recognition of potentially harmful gambling behaviour.

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 a player's answers raise concern, support staff are encouraged to guide them toward available responsible gambling options.

As part of our commitment to promoting responsible gambling, we ensure that customer support staff are trained to detect signs of concerning behaviour in player interactions. If any concerning verbal behaviour is detected during a chat session, the support team will ask the player the following PG Quiz questions to assess whether the player may be experiencing gambling-related issues:

- Have you ever gambled to get money so you can pay debts?
- Has your gambling made you careless about the welfare of yourself or your family?
- Have you ever borrowed money or sold anything to gamble?
- Has your gambling ever caused you any health problems?
- Have you ever felt extremely guilty after finishing a gambling session?
- Have you ever felt you might have a problem with gambling?

These questions are designed to help identify early warning signs of problematic gambling behaviour. Based on responses, support personnel will provide appropriate guidance, suggest relevant tools, or refer players to professional organisations for additional help.

Article 4: Cooling-Off & Self-Exclusion

4.1 Cooling-Off Periods

We fully recognise the need for individuals to take breaks and reflect on their gaming habits. To this end, players are empowered to initiate a temporary exclusion from gambling, including casino games and sports betting, for the following durations:

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

The Cooling-Off Period is an immediate action that can be activated by the player and does not require any approval. During this period, the player won't be able to make deposits and play during the specified period, also the user will be excluded from all marketing communication. This feature is available to all players who wish to take a short-term break. Players are encouraged to use this option if they feel they need time away from gambling to reassess their behaviour.

4.2 Self-Exclusion Process

We offer players the option of self-exclusion to help individuals take a more extended break from gambling activities, including both gaming and sports betting.

Self-exclusion is a voluntary safeguard that allows a player to temporarily or permanently prevent themselves from engaging in gambling activities. The available durations are:

- 1 year
- 3 years
- Permanent

Once the limit is activated, an account will immediately be disabled, and a user will be excluded from all promotional offers for the set period. While the limit is active, depositing and betting are restricted, although a player may withdraw the remaining funds upon request to the support team.

Self-exclusion applies to all brands and domains operated by Apalonik B.V., which means that once activated, the player will be restricted from accessing any of the company's platforms.

To ensure that the self-exclusion process is effective and cannot be circumvented, duplicate accounts and known payment methods will be blocked. This prevents players from creating new accounts or using known payment methods to bypass their self-exclusion.

4.3 Post-Exclusion Reactivation

Once the self-exclusion period has ended, and a player wishes to return after the exclusion period, they must follow a structured reactivation process:

1. **Submit a Written Request:** A written request must be submitted, confirming a clear and conscious decision to resume gambling. This ensures that the decision to return to gambling is deliberate and considered.
2. **Acknowledge Responsible Gaming Reminders:** Upon reactivation, the player will be reminded of key responsible gambling principles and required to confirm their understanding. These reminders serve to highlight the importance of safe and controlled gambling practices.
3. **Complete a Self-Assessment:** Before resuming play, the player must complete a self-assessment, such as the CAGE Questionnaire or a similar responsible gambling questionnaire, to evaluate their current gambling behaviour and ensure they are fit to return to gambling.

Article 5: Deposit Limits & Financial Management

5.1 Deposit & Wagering Limits

Players have the ability to define daily, weekly, or monthly limits for both deposits and wagers. These settings support users in maintaining financial control over their gambling activities across casino and sports betting services.

- **Deposit Limits:** Players can set limits on the amount they deposit into their accounts within a specified period (daily, weekly, or monthly).
- **Wagering Limits:** Players may also set limits on the amount they are willing to wager. Note: Wagering limits do not apply to sports betting.

Limit Adjustments:

- Any decrease in limits will take effect immediately, allowing for prompt self-regulation.
- Requests to increase limits will incur a 24-hours cooling-off period, giving players time to reconsider before the new limit takes effect.

5.2 Other Limits

Players also have access to extra features for enhanced financial control (excluding sports betting):

- **Loss Limits:** Players can establish limits on the total amount they are willing to lose within a specified period (daily, weekly, or monthly). Once the threshold is reached, further gambling is restricted until the next cycle begins.
- **Session Time Limits:** Players can set a limit on the amount of time they wish to spend on gambling activities during each session. This helps to ensure players take regular breaks and maintain control over their gambling duration.

Article 6: Player Behaviour Monitoring & Early Detection

6.1 Behaviour Tracking

We use a Responsible Gambling Risk Scoring System to monitor user activity and detect patterns that may suggest problematic gambling behaviour. This system analyses multiple behavioural indicators to build a comprehensive profile of a player's habits.

Rather than relying on a single factor, the system evaluates varied data points to identify elevated risk levels, ensuring that players can be offered help or guidance proactively.

6.2 Intervention Procedures

When behavioural tracking indicates a cause for concern, the player is contacted by our team. Depending on the severity of the risk, the following actions may be implemented:

- Provision of responsible gambling advice and tools
- Application of deposit or session limits
- Temporary suspension of the account
- Initiation of self-exclusion, where necessary

These interventions are aimed at protecting player well-being and maintaining the platform's commitment to responsible gambling principles.

Article 7: Marketing & Advertising Compliance

7.1 Prohibited Advertising Practices

The following marketing practices are strictly disallowed under this Responsible Gambling Policy:

- **Misleading Information about Winnings:** No advertisements or marketing materials may make false or misleading claims regarding the likelihood of winning or guaranteed outcomes in gambling activities.
- **Targeting Self-Excluded Individuals:** Advertising efforts must not target or reach individuals who are self-excluded from gambling, in any form of promotional material.
- **Targeting Individuals Under 25 for High-Risk Casino Games:** High-risk casino games should not be marketed to individuals under the age of 25, ensuring that gambling promotions are directed only at those who are legally permitted to engage in such activities.
- **Appealing to Financially Vulnerable Individuals:** Advertising must not be directed at individuals who may be financially vulnerable, including those who are at risk of or have been identified as having financial difficulties.

7.2 Affiliate & Influencer Compliance

All affiliate marketers and influencers must comply with the advertising guidelines set forth by the Curaçao Gaming Authority. The following practices are strictly prohibited in all marketing materials:

- **Use of Minors or Child-Friendly Characters:** Marketing should not include minors or child-friendly characters, ensuring that promotional content does not appeal to underage audiences.
- **Sexualized Content:** Advertising must not contain sexualized content, imagery, or messages that could be seen as inappropriate or offensive to the public.

- Gambling as a Financial Solution: Promotions must not suggest or imply that gambling is a legitimate means of financial gain or solving financial problems. Advertising must maintain ethical standards and avoid misleading or harmful messaging.

Article 8: Staff Training & Internal Compliance

8.1 Employee & Customer Support Training

It is essential that all staff, especially customer support and VIP team, as well as the Responsible Gambling team, are equipped with the knowledge and skills to recognise signs of gambling addiction and to provide appropriate assistance when necessary. To ensure a comprehensive understanding of responsible gambling practices, all employees undergo regular Responsible Gaming training.

Training Strategy:

- Internal Modules: Staff are trained using in-house content covering topics such as problem gambling indicators, available support tools, and internal escalation procedures.
- External Expertise: We also collaborate with specialised third-party organisations and responsible gambling professionals, ensuring staff receive updated industry insights and best-practice techniques for supporting vulnerable players.

8.2 Responsible Gaming Team

A dedicated Responsible Gambling Team is appointed to oversee the full implementation of the Responsible Gambling Policy across all areas of operation. Their role is to ensure that responsible gambling protocols are:

- Implemented consistently
- Monitored regularly
- Updated when needed

As part of their responsibilities, the team conducts an annual evaluation of the policy's effectiveness. A comprehensive internal report is presented to executive management, summarising outcomes and recommending updates, if required.

If any modifications to the policy are made, a corresponding report will be submitted to the Curaçao Gaming Authority, in line with regulatory expectations.

Article 9: Incident Reporting & Regulatory Compliance

9.1 Incident Reporting to CGA

If an underage player or a self-excluded individual gains access to the platform, the following actions will be taken immediately:

1. The associated account will be blocked to prevent further activity.
2. All deposits made by the individual will be refunded within two business days.
3. A detailed incident report outlining the circumstances and actions taken will be submitted to the Curaçao Gaming Authority within 5 working days.

9.2 Audit & Compliance Checks

All records related to age verification, responsible gambling interventions, and self-exclusions are retained in a secure and compliant manner for a minimum of seven (7) years.

The Curaçao Gaming Authority reserves the right to request compliance audits at any time. These audits ensure that all regulatory requirements are met and that responsible gaming standards are being upheld effectively.

Article 10: Policy Review & Amendments

10.1 Ongoing Review

This policy is subject to an annual review to evaluate its effectiveness and to ensure alignment with current legislation, emerging risks, and industry best practices.

Any revisions made to the policy will be submitted to the Curaçao Gaming Authority for approval to maintain compliance with regulatory requirements.

Through this commitment to continuous improvement, Apalonik B.V. ensures that its Responsible Gambling Policy remains robust, relevant, and reflective of evolving industry standards.