

# POLICY Review

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| Reviewer    |  |
| Date        |  |
| Approved by |  |

*Report on the review of application number*

**Reviewer's opinion:**

The report gives an overview of XXX policies uploaded during LOK license application. This review is based on the CGA checklist as established during license application.

**Basis for the opinion:**

The reviewer has tried to gather all possible evidence whilst doing the review and remained independent from any external influence.

All evidence has been saved on the attached documents hereafter.

**Emphasis of Matter:**

*The policies reviewed are as follows:*

*AML Policy*

*KYC Policy*

*Responsible Gaming Policy*

*Player Complaints Policy*

*Information Security Policy*

## AML Policy

| Title                                 | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Instruction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | Criticality |
|---------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Signature of CC and Managing director | Is the document signed by the Compliance officer and Managing Director?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The policy must be signed by the Compliance officer and managing director of the applicant                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 4           |
| Responsible office                    | Does it identify the office responsible for Dissemination updates and review of the policy?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | The policy must identify the office responsible for Dissemination updates and review of the policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 4           |
| Version Control                       | Does it show the date the policy or revision takes effect?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The policy must indicate the date of the policy issue and/or latest revision                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 6           |
| Periodic Review                       | Does it indicate whether or not the policy will be reviewed and how often?                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | The policy must state that it will be reviewed periodically, at minimum, once a year                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 6           |
| General Policy Statement              | A clear and concise statement of the Company's commitment regarding the policy's subject matter, including its scope and applicability.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | The policy must include a concise statement of the company's commitment regarding the policy's subject matter, including its scope and applicability                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9           |
| Purpose                               | Explain the rationale for the policy, including any legal, regulatory, or business requirements it addresses.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The policy must state the rationale for the policy, including any legal, regulatory, or business requirements it addresses                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 9           |
| Audience                              | Identify the stakeholders affected by the policy, such as "All employees," "Subcontractors," or "Third-party suppliers."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | The policy must identify the stakeholders affected by the policy, such as "All employees," "Subcontractors," or "Third-party suppliers."                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 8           |
| Definitions                           | Define key terms with specialized meanings relevant to the policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The policy must define any key terms with specialized meaning relevant to the policy                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 8           |
| Legal Framework                       | Reference Curaçao laws: LOK, NORUT, NOIS, CGA Guidelines, Sanctions Ordinance, Criminal Code                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | The policy must make reference to Curaçao laws, specifically the following: LOK, NORUT, NOIS, CGA Guidelines, Sanctions Ordinance, Criminal Code                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 8           |
| Policy Implementation                 | Outline how the policy will be carried out, including key responsibilities and any necessary procedures. Use subheadings for clarity. If procedures are documented separately, specify the responsible department for oversight.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | The policy must outline how it will be carried out, including key responsibilities and any necessary procedures, using subheadings for clarity. If procedures are documented separately, specify the responsible department for oversight.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 9           |
| Business Risk Assessment (BRA)        | Conduct a comprehensive risk assessment of business operations; Outline business risk assessment carried out to identify the ML/TF risks you are exposed to and ensure that the policies, controls and procedures adopted are adequate to prevent and mitigate those risks. The risk assessment should address the ways in which the casino's products and services, type of customers, delivery channels and geographical factors could be used to launder money, finance terrorism and finance proliferation, and the extent of the risk that this will happen. In this respect the casino should indicate risk it is prepared to accept. Furthermore, it should indicate how effectiveness of the measures to mitigate risks are monitored and improved. Revision of the BRA should happen whenever changes occur to the operating environment, otherwise once a year. The BRA should be documented and approved by management. Technological development risk assessment should be carried out prior to launch of new products, business practices, delivery mechanism or new technologies. | The operator must conduct a comprehensive risk assessment of business operations which is to be included in the AML Policy. This should outline the assessment carried out to identify the ML/TF risks the operator is exposed to and ensure that the policies, controls and procedures adopted are adequate to prevent and mitigate those risks. The risk assessment should address the ways in which the casino's products and services, type of customers, delivery channels and geographical factors could be used to launder money, finance terrorism and finance proliferation, and the extent of the risk that this will happen. In this respect the casino should indicate risk it is prepared to accept. Furthermore, it should indicate how effectiveness of the measures to mitigate risks are monitored and improved. Revision of the BRA should happen whenever changes occur to the operating environment, otherwise once a year. The BRA should be documented and approved by management. Technological development risk assessment should be carried out prior to launch of new products, business practices, delivery mechanism or new technologies. | 9           |

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| Customer Risk Assessment (CRA)                              | The Customer Risk Assessment will assess the particular risks the casino will be exposed to when providing its services or products to players. The information collected to draw up the CRA will formulate the customer's risk profile. The customer specific risk assessment has to be carried out during establishing a business relationship. The categories follow from the BRA                                                                                                                                                                                                                                                           | The operator must conduct a Customer Risk Assessment which will assess the particular risks the casino will be exposed to when providing its services or products to players. The information collected to draw up the CRA will formulate the customer's risk profile. The customer specific risk assessment has to be carried out during establishing a business relationship. The categories follow from the BRA.                                                                                                                                                                                                                                            | 9 |
| Customer Acceptance Policy                                  | On the basis of the CRA, the proper level of CDD can then be applied as stipulated in the Customer Acceptance Policy (CAP). When drawing up its CAP the casino has to comply with its obligations with regard to Politically Exposed Persons (PEP) and Sanctions Screening. The CAP should address the type of players that pose higher than average risk and also indicate the circumstances under which a player is denied.                                                                                                                                                                                                                  | On the basis of the CRA, the AML & KYC Policy must include a Customer Acceptance Policy, on which the proper level of CDD can then be applied. When drawing up its CAP the casino has to comply with its obligations with regard to Politically Exposed Persons (PEP) and Sanctions Screening. The CAP should address the type of players that pose higher than average risk and also indicate the circumstances under which a player is denied.                                                                                                                                                                                                               | 9 |
| Customer Due Diligence (CDD) (XCG 4000 threshold)           | Describe timing and which measures are used for customer due diligence including PEP and sanction screening. Further describe the actions taken when XCG 4,000 is reached, but not all documents have been submitted by the player. Describe what happens if the requested information is still not received within 30 days of reaching the threshold. Describe the process if the business relationship needs to be terminated. Describe the timing of ongoing sanctions screening (UN and EU list) and the procedure followed for freezing of funds and reporting to competent authorities in Curacao. Describe how threshold is calculated. | The policy must describe timing and which measures are used for customer due diligence including PEP and sanction screening. Further describe the actions taken when XCG 4,000 is reached, but not all documents have been submitted by the player. Describe what happens if the requested information is still not received within 30 days of reaching the threshold. Describe the process if the business relationship needs to be terminated. Describe the timing of ongoing sanctions screening (UN and EU list) and the procedure followed for freezing of funds and reporting to competent authorities in Curacao. Describe how threshold is calculated. | 9 |
| Ongoing Monitoring                                          | Describe the measures employed for ongoing monitoring of customers identity and transactions                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | The policy must describe the measures employed for ongoing monitoring of customers identity and transactions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9 |
| Reliance on third parties to perform customer due diligence | Describe if the operator relies on third parties for CDD and how that is arranged                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | The policy must describe if the operator relies on third parties for CDD and how that is arranged.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 9 |
| Crypto Policy                                               | Define rules and risk controls around virtual assets and crypto usage                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | The policy must define the rules and risk controls around virtual assets and crypto usage.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 9 |
| Transaction Monitoring                                      | Set automated triggers for suspicious transaction patterns. Analyze patterns to detect structuring or other suspicious behavior                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | The policy must define the set automated triggers for suspicious transaction patterns and how the operator analyzes patterns to detect structuring or other suspicious behaviour.                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 9 |
| Record Keeping                                              | Retain records of CDD, transactions, and UTR (objective and subjective) for 5 years                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | The policy must state that the operator retains records of CDD, transactions, and UTR (objective and subjective) for at least 5 years.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 9 |
| Reporting to FIU Curaçao (XCG 5000)                         | Describe the process in place to recognize and report unusual transactions to the Curacao FIU when threshold of XCG 5000 is reached. Please note the prohibition to disclose a report filed to the FIU. The record keeping requirements for CDD information and transactions needs to be described. Describe how to calculate threshold.                                                                                                                                                                                                                                                                                                       | The policy must describe the process in place to recognise and report unusual transactions to the Curacao FIU when the threshold of XCG 5,000 is reached. It is important to note the prohibition to disclose a report filed to the FIU. The record keeping requirements for CDD information and transactions also need to be described.                                                                                                                                                                                                                                                                                                                       | 9 |

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| Compliance with Internal Policy   | Describe the risks and potential consequences of violating the policy, including disciplinary actions, legal implications, or business risks. All staff confirm awareness and compliance with AML policy | The policy must describe the risks and potential consequences of violating the policy, including disciplinary actions, legal implications, or business risks. All staff must confirm awareness and compliance with the AML policy. | 8 |
| Appointment of Compliance Officer | Assign a trained and independent AML Compliance Officer                                                                                                                                                  | The policy must assign a trained and independent AML Compliance Officer.                                                                                                                                                           | 9 |
| Independent Audit                 | Annual audit of AML program and internal controls                                                                                                                                                        | The policy must outline the annual audit plan of the AML program and internal controls.                                                                                                                                            | 8 |
| Policy History/Policy Maintenance | Indicate whether this is a new policy or if it replaces an existing one. List previous versions with effective dates and revisions, if applicable.                                                       | The policy must indicate whether it is a new policy or if it supersedes an existing one. Previous versions must be listed with effective dates and revisions, if applicable.                                                       | 8 |
| Related Information               | Provide links or references to related policies, legal or regulatory frameworks, guidelines, or relevant forms and templates.                                                                            | The policy must provide links or references to related policies, legal or regulatory frameworks, guidelines, or relevant forms and templates.                                                                                      | 8 |
| Contact Information               | For any questions regarding this policy, please contact: [Insert name and email address.]                                                                                                                | The document must provide contact information for any questions regarding the policy which must include the name and email address of the designated contact person.                                                               | 8 |
| Policy URL (if applicable)        | Indicate where the policy can be accessed online if published on the Company website.                                                                                                                    | The policy must indicate where the policy can be accessed online if published on the company website.                                                                                                                              | 8 |

[illegible]

[illegible]

[illegible]

| #  | Category                     |
|----|------------------------------|
| 1  | Accessibility & Transparency |
| 2  | Accessibility & Transparency |
| 3  | Accessibility & Transparency |
| 4  | Accessibility & Transparency |
| 5  | Accessibility & Transparency |
| 6  | Accessibility & Transparency |
| 7  | Player Acknowledgement       |
| 8  | Player Acknowledgement       |
| 9  | Player Acknowledgement       |
| 10 | Player Acknowledgement       |
| 11 | Record-Keeping & Archiving   |
| 12 | Record-Keeping & Archiving   |
| 13 | Record-Keeping & Archiving   |
| 14 | Licensee Disclosure          |
| 15 | Licensee Disclosure          |
| 16 | Licensee Disclosure          |
| 17 | Licensee Disclosure          |
| 18 | Licensee Disclosure          |
| 19 | Licensee Disclosure          |

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| 20 | Licensee Disclosure              |
| 21 | Player Eligibility & Obligations |
| 22 | Player Eligibility & Obligations |
| 23 | Player Eligibility & Obligations |
| 24 | Player Eligibility & Obligations |
| 25 | Player Eligibility & Obligations |
| 26 | Player Eligibility & Obligations |
| 27 | Player Eligibility & Obligations |
| 28 | Player Eligibility & Obligations |
| 29 | KYC & AML/CFT                    |
| 30 | KYC & AML/CFT                    |
| 31 | KYC & AML/CFT                    |
| 32 | Data Protection                  |
| 33 | Data Protection                  |
| 34 | Account Management               |
| 35 | Account Management               |

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|----|-------------------------------|
| 36 | Account Management            |
| 37 | Account Management            |
| 38 | Account Management            |
| 39 | Player Funds & Withdrawals    |
| 40 | Player Funds & Withdrawals    |
| 41 | Player Funds & Withdrawals    |
| 42 | Player Funds & Withdrawals    |
| 43 | Player Funds & Withdrawals    |
| 44 | Player Funds & Withdrawals    |
| 45 | Player Funds & Withdrawals    |
| 46 | Bonuses & Promotions          |
| 47 | Bonuses & Promotions          |
| 48 | Bonuses & Promotions          |
| 49 | Bonuses & Promotions          |
| 50 | Bonuses & Promotions          |
| 51 | Bonuses & Promotions          |
| 52 | Game Fairness & Cancellations |

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| 53 | Game Fairness & Cancellations |
| 54 | Game Fairness & Cancellations |
| 55 | Game Fairness & Cancellations |
| 56 | Responsible Gaming            |
| 57 | Dispute Resolution            |
| 58 | Final Provisions              |
| 59 | Final Provisions              |
| 60 | Final Provisions              |
| 61 | Final Provisions              |
| 62 | Final Provisions              |
| 63 | Final Provisions              |
| 64 | Final Provisions              |

| Policy Requirement                                                                                                                                                                                    |
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| Current T&Cs must be available at all times in a clear and readable form across all websites, mobile platforms, and other delivery mediums.                                                           |
| T&Cs must be accessible within one click from the homepage, registration page, and player account area.                                                                                               |
| Previous versions of T&Cs must be made available to the player upon request.                                                                                                                          |
| T&Cs must be clear, unambiguous, transparent, and internally consistent.                                                                                                                              |
| Where multiple brands operate under one Licensee, any differences in T&Cs between brands must be made clear.                                                                                          |
| T&Cs must clearly state the process for updates and amendments and the obligations on both parties. Changes must not apply retrospectively unless they do not prejudice the player or correct errors. |
| During registration, players must actively acknowledge acceptance of the T&Cs (e.g., by ticking a checkbox). Passive acceptance is not sufficient.                                                    |
| Players must be notified of any T&C updates. Notifications must reference material changes/clause numbers, include the effective date, and provide a direct link to updated T&Cs.                     |
| Material changes require active re-acceptance. Passive notice is acceptable only for administrative or non-impactful updates.                                                                         |
| The consequences of rejecting amended T&Cs must be clearly laid out.                                                                                                                                  |
| Licensees must maintain a historical archive of all T&Cs effective from 24 December 2024.                                                                                                             |
| Licensees must securely log data on all players confirming acceptance (or non-acceptance) of the current T&C version.                                                                                 |
| Evidence of player notification regarding T&C changes must be retained and made available to the CGA upon request.                                                                                    |
| T&Cs must prominently disclose the legal name of the Licensee as registered with the Curaçao Chamber of Commerce.                                                                                     |
| T&Cs must disclose the registered business address.                                                                                                                                                   |
| T&Cs must disclose the Chamber of Commerce registration number.                                                                                                                                       |
| T&Cs must disclose the CGA license number, issue date, and licensee name as registered with the CGA.                                                                                                  |
| If non-CGA products/services are offered under the same brand, the T&Cs must specify which are not regulated by the CGA and inform players of any redirection to a non-CGA entity.                    |
| The agreement must be governed by the laws of Curaçao and disputes submitted to a competent court of Curaçao (per Article 5.5 of the LOK).                                                            |

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| T&Cs must outline that players are responsible for keeping login credentials secure and address liability for unauthorised account access.                                                                                               |
| T&Cs must state the minimum legal age for registration in line with Curaçao law and prohibit third-party registration/acceptance.                                                                                                        |
| T&Cs must inform players of the jurisdictions in which participation is permitted and those in which it is restricted or prohibited.                                                                                                     |
| T&Cs must stipulate that players may not sell, transfer, or acquire accounts.                                                                                                                                                            |
| T&Cs must include rules addressing duplicate accounts, dormant accounts, and suspension/closure.                                                                                                                                         |
| Players must be required to provide accurate and complete registration details, keep credentials secure, use their account solely for personal play, and refrain from collusion or fraudulent behaviour.                                 |
| T&Cs must describe Licensee controls for detecting/preventing collusion and fraudulent play and outline the consequences (e.g., account closure, forfeiture of winnings, reporting to authorities).                                      |
| T&Cs must define acceptable behaviour in chatrooms, forums, and messaging channels.                                                                                                                                                      |
| T&Cs must state whether a Code of Ethics applies and provide details or a link.                                                                                                                                                          |
| T&Cs must make clear that KYC is expected, provide an overview of what it entails and when it applies, and list documentation that may be required. A link to a standalone KYC policy must be included if the detail is held separately. |
| T&Cs must clarify that refreshed KYC on account closure will not require information beyond what was requested at account opening, except where strictly necessary for AML/CFT compliance.                                               |
| T&Cs must state that all transactions are monitored for AML/CFT compliance, that suspicious transactions will be reported to relevant authorities, and that player data will be screened against sanctions/PEPs lists.                   |
| T&Cs must disclose how player data is processed and retained, or link to a separate privacy policy. If linked separately, the section must be easy to locate with a clear heading.                                                       |
| The data policy must cover at minimum: collection, use, storage, retention, and sharing of personal data in compliance with GDPR, LOK, and other applicable legislation. Retention periods must be clearly communicated.                 |
| T&Cs must define clear rules regarding liability limits related to player accounts, including technical failure, fraud, unauthorised access, and (for live dealer games) human error.                                                    |
| T&Cs must explain in detail when and how accounts may be suspended or terminated, covering violations of T&Cs, suspected fraud, failure to verify identity, and regulatory obligation breaches.                                          |

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| T&Cs must address what happens to player funds (fiat and crypto) upon suspension/termination, how players can escalate if dissatisfied, and the process for returning funds.                                                                        |
| Licensees must outline the player-initiated account closure procedure, including how to request closure, confirmation steps, and timelines.                                                                                                         |
| T&Cs must define when an account is considered inactive/dormant, specify consequences of inactivity (including reasonable contact attempts), and disclose any fees applicable to dormant accounts along with how players are notified of such fees. |
| T&Cs must address all deposit and withdrawal methods and provide expected/average processing times for each.                                                                                                                                        |
| T&Cs must specify any conditions on withdrawals, including identity verification requirements, particularly where cumulative deposits/withdrawals exceed XCG 4,000 (approx. EUR 2,000).                                                             |
| T&Cs must address any restrictions on withdrawing unwagered funds and withdrawal conditions in line with AML/CFT policy.                                                                                                                            |
| T&Cs must include specific terms regarding crypto funds, deposits, and withdrawals in accordance with the CGA Crypto Policy.                                                                                                                        |
| T&Cs must state that the Licensee is not a financial institution and that no interest is owed or paid on deposited funds.                                                                                                                           |
| T&Cs must outline remittance rules, including that funds are returned to the originating account and the process where this is not possible (e.g., suspended PSP wallets, unavailable/sanctioned crypto wallets).                                   |
| T&Cs must address crypto-specific remittance situations including delisted tokens, chain forks, and sanctioned or blocked addresses.                                                                                                                |
| Bonus terms must be clear, fair, and prominently disclosed either in the main T&Cs or in a linked bonus-specific T&C.                                                                                                                               |
| Players must explicitly accept bonus terms before participation.                                                                                                                                                                                    |
| Players must not be time-barred from accessing a bonus in a way that could prevent them from checking the full T&Cs.                                                                                                                                |
| Bonus-specific T&Cs must include: wagering requirements and calculation method, expiry periods, confiscation/forfeiture conditions, withdrawal restrictions, and all other general bonus conditions.                                                |
| T&Cs must state whether bonus funds are withdrawable and under what conditions.                                                                                                                                                                     |
| T&Cs must explicitly identify any instances where prize money is not cashable (including bonus money) and clearly communicate conditions for its use.                                                                                               |
| T&Cs must state that all games are fair and use certified RNGs.                                                                                                                                                                                     |

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| T&Cs must explain how results are determined and how discrepancies are resolved in fixed odds betting, live dealing, and any other non-RNG products.                                                                                    |
| T&Cs must outline principles and procedures for cancellation or termination of events, competitions, bets, or wagers (e.g., odds errors, software bugs, live dealer mistakes), including refund eligibility and the applicable process. |
| T&Cs must specify procedures in the event of errors in published odds, pay tables, gaming software, or live dealer games.                                                                                                               |
| The T&Cs must detail the Licensee's Responsible Gaming policy. If it is a separate document, it must be referenced in the T&Cs with a link provided.                                                                                    |
| T&Cs must detail or link to the complaints policy, including complaint handling and escalation procedures.                                                                                                                              |
| T&Cs must include a governing law clause referencing Curaçao.                                                                                                                                                                           |
| T&Cs must include a severability clause.                                                                                                                                                                                                |
| T&Cs must include an entire agreement clause.                                                                                                                                                                                           |
| T&Cs must include contact details for player support.                                                                                                                                                                                   |
| T&Cs must state they are reviewed periodically and updated in line with regulatory changes.                                                                                                                                             |
| The current English-language version of the T&Cs must be uploaded to the CGA portal. If multiple brands operate, all versions must be uploaded.                                                                                         |
| Licensees must review and update their T&Cs to achieve full compliance within 6 months of Version 1.0 release of this Policy.                                                                                                           |

## Compliance Check

Verify T&Cs are accessible and legible on desktop website, mobile site, and any app versions of the platform.

Navigate from homepage, registration page, and player account area; confirm T&Cs are reachable within a single click from each.

Confirm the T&Cs state that historical versions are available upon request and test the request mechanism if possible.

Review T&Cs for contradictory clauses, ambiguous language, and consistency with the Licensee's actual practices and other published policies.

If applicable, cross-check T&Cs across all brands operated by the Licensee and confirm differences are clearly indicated.

Check that the T&Cs contain an explicit amendment procedure clause and confirm no retrospective changes that disadvantage players are present.

Test the registration flow and confirm an active action (checkbox or equivalent) is required before account creation proceeds.

Review the notification template or process; confirm it includes clause references, effective date, and a direct hyperlink to the new T&Cs.

Identify which change categories the Licensee classifies as 'material' and verify that an active re-acceptance mechanism is triggered for such changes.

Check that the T&Cs or notification explains what happens if a player declines the amended terms (e.g., account suspension or closure).

Confirm an archive of all T&C versions since 24 December 2024 is maintained and accessible.

Verify that a player-level acceptance log exists and is stored securely; confirm it can be produced for CGA inspection.

Check that the Licensee retains records of notifications sent to players (e.g., email logs, in-platform notifications) and can provide these on request.

Confirm the exact registered legal name appears prominently in the T&Cs and matches the Chamber of Commerce registration.

Verify the full registered business address is stated in the T&Cs.

Confirm the Chamber of Commerce registration number is present and accurate.

Cross-reference the CGA license number, issue date, and registered licensee name in the T&Cs against CGA records.

Check whether the brand offers products outside CGA regulation; if so, verify the T&Cs clearly identify these and warn players of the redirect.

Confirm a governing law clause specifying Curaçao law and a jurisdiction clause referencing Curaçao courts are present in the T&Cs.

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| Check for a dedicated account security clause covering credential responsibility and liability allocation for unauthorised access.                                                       |
| Confirm the minimum age requirement is stated and that the T&Cs explicitly prohibit a third party from registering on behalf of a player.                                                |
| Review the restricted/permitted jurisdictions list in the T&Cs and verify it is up to date and accurately reflects the Licensee's actual restrictions.                                   |
| Confirm an explicit prohibition on account selling, transferring, or acquiring is included in the T&Cs.                                                                                  |
| Check that dedicated provisions for each of these scenarios (duplicates, dormancy, suspension, closure) are present and clearly written.                                                 |
| Confirm all four obligations are explicitly stated in the T&Cs.                                                                                                                          |
| Verify the T&Cs describe monitoring/logging controls and specify the consequences of collusion or fraud.                                                                                 |
| Check that a code of conduct or acceptable use policy for communication channels is included or referenced in the T&Cs.                                                                  |
| Confirm the T&Cs reference a Code of Ethics (or explicitly state none applies) and provide details or a working link if applicable.                                                      |
| Verify the T&Cs include an overview of the KYC process, trigger events, and document types; confirm the link to any standalone KYC policy is present and functional.                     |
| Check that the T&Cs explicitly limit additional KYC requests at closure to AML/CFT-necessary cases only.                                                                                 |
| Confirm the T&Cs contain an AML/CFT monitoring clause, a reporting obligation statement, and a reference to sanctions/PEPs screening.                                                    |
| Verify that data processing and retention information is present in the T&Cs or that a clearly signposted link to a standalone privacy policy is included.                               |
| Review the data policy/section to confirm it addresses all five elements (collection, use, storage, retention, sharing) and states specific retention periods in line with GDPR and LOK. |
| Check that the T&Cs contain a liability limitation clause covering each specified scenario.                                                                                              |
| Verify that each suspension/termination trigger is individually addressed and that the procedure for each is clearly described.                                                          |

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| Confirm the T&Cs specify fund treatment on termination/suspension, include an escalation pathway, and describe the funds-return process.                                                      |
| Check that the T&Cs contain a step-by-step account closure procedure with defined timelines.                                                                                                  |
| Verify the dormant account definition, notification obligation, fee disclosure, and fee calculation method are all present and clearly stated.                                                |
| Confirm that each available payment method is listed with its corresponding processing time for both deposits and withdrawals.                                                                |
| Check the T&Cs for the XCG 4,000 threshold disclosure and confirm the verification conditions at and above this level are clearly explained.                                                  |
| Review the withdrawal section for restrictions on unwagered funds and confirm consistency with the Licensee's AML/CFT policy.                                                                 |
| Verify that dedicated crypto-specific terms are present for deposits and withdrawals and are consistent with the CGA Crypto Policy.                                                           |
| Confirm the non-financial institution disclaimer and the no-interest statement are explicitly included.                                                                                       |
| Check that the T&Cs state the default remittance rule and provide an alternative process for cases where return to the original account is not possible, including fiat and crypto scenarios. |
| Confirm the T&Cs contain provisions for each crypto remittance edge case: delisted tokens, chain forks, and sanctioned/blocked wallet addresses.                                              |
| Verify that bonus terms are either embedded in the main T&Cs or that a clearly signposted link to bonus-specific T&Cs is provided.                                                            |
| Confirm that the registration or bonus opt-in flow requires an active acceptance action for bonus terms.                                                                                      |
| Review bonus offer timelines to ensure sufficient time is given for players to review and understand the full bonus T&Cs before any deadline expires.                                         |
| Check bonus T&Cs for each required element: wagering requirements, expiry periods, forfeiture conditions, withdrawal restrictions, and any other conditions. Confirm none are omitted.        |
| Confirm the T&Cs explicitly state whether bonus funds can be withdrawn and if so, the conditions that must be met.                                                                            |
| Identify all non-cashable prize money types listed in the T&Cs and confirm the conditions for use are clearly stated for each.                                                                |
| Confirm the T&Cs include a statement that games are fair and that RNGs are certified by an approved testing body.                                                                             |

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| Check that the T&Cs include result-determination and discrepancy-resolution provisions for each product type offered (fixed odds, live dealer, other non-RNG).                             |
| Verify the T&Cs contain a cancellation/termination policy covering odds errors, software bugs, and live dealer errors, with refund eligibility criteria and the process clearly described. |
| Confirm that the T&Cs include a dedicated errors clause covering each scenario: odds errors, pay table errors, software errors, and live dealer mistakes.                                  |
| Confirm the Responsible Gaming policy is either fully embedded in the T&Cs or that a clear reference and functional link to a standalone policy is included.                               |
| Verify that the T&Cs include the complaints procedure or a clear, functional link to the complaints policy, covering both first-line handling and escalation steps.                        |
| Confirm the governing law clause explicitly references Curaçao law.                                                                                                                        |
| Check that a severability clause is present in the final provisions section.                                                                                                               |
| Confirm an entire agreement (or merger) clause is present.                                                                                                                                 |
| Verify that player support contact details (e.g., email, live chat, phone) are included in the T&Cs.                                                                                       |
| Confirm the T&Cs include a statement that they are subject to periodic review and updated to reflect regulatory changes.                                                                   |
| Verify that the current English T&Cs are uploaded to the CGA portal; if multiple brands exist, confirm all brand versions are uploaded.                                                    |
| Check the T&Cs version date and confirm that a compliance review was completed and submitted to the CGA within the required 6-month window.                                                |

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### KYC Policy

| Title                           | Description                                                                                                                                                                                                                                                                                                                               | Instruction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Criticality | Comments |
|---------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|----------|
| Registered player               | The policy must state that players who do not register themselves will not be allowed to play.                                                                                                                                                                                                                                            | The policy must state that players who do not register themselves will not be allowed to play.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9           |          |
| Registration procedure          | The policy must set out the player registration procedure, including the information which will be requested from the players.                                                                                                                                                                                                            | The policy must set out the player registration procedure, including the information which will be requested from the players.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9           |          |
| CDD initiation                  | The policy must specify the point in time between the establishment of the business relationship and when the deposit threshold is met in which customer due diligence (CDD) will be initiated, and if it is undertaken upon the deposit threshold being met, the procedures shall indicate how the deposit threshold will be calculated. | The policy must specify the point in time between the establishment of the business relationship and when the deposit threshold is met in which customer due diligence (CDD) will be initiated, and if it is undertaken upon the deposit threshold being met, the procedures shall indicate how the deposit threshold will be calculated.                                                                                                                                                                                                                                                                                                                                                       | 9           |          |
| CDD procedure                   | The policy must set out the procedure to be adopted when conducting CDD.                                                                                                                                                                                                                                                                  | The policy must set out the procedure to be adopted when conducting CDD.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 9           |          |
| Verification of player identity | The policy must outline the documentary evidence required for verification of a player's identity and residential address and specify that the evidence obtained for verification of residential address should not be more than 6 months old.                                                                                            | The policy must outline the documentary evidence required for verification of a player's identity and residential address and specify that the evidence obtained for verification of residential address should not be more than 6 months old.                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9           |          |
| Failure to complete CDD/KYC     | The policy must outline the procedure that needs to be followed in instances where, following the lapse of 30 days from when the deposit threshold is met, the CDD/KYC identification and verification cannot be completed.                                                                                                               | The policy must outline the procedure that needs to be followed in instances where, following the lapse of 30 days from when the deposit threshold is met, the CDD/KYC identification and verification cannot be completed.                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 9           |          |
| Sanctions screening             | The policy must provide for name screening against sanctions lists to be carried out prior to the onset of the business relationship and at determinate points in time afterwards, the procedure to be adopted in carrying out sanctions screening and the sources used for such purpose.                                                 | The policy must provide for name screening against sanctions lists to be carried out prior to the onset of the business relationship and at determinate points in time afterwards, the procedure to be adopted in carrying out sanctions screening and the sources used for such purpose.                                                                                                                                                                                                                                                                                                                                                                                                       | 9           |          |
| PEP screening procedure         | The policy must set out the procedure to be adopted in carrying out screening for PEP status, as well as the screening of existing customers for PEP status and the frequency of such checks on a risk-based approach.                                                                                                                    | The policy must set out the procedure to be adopted in carrying out screening for PEP status, as well as the screening of existing customers for PEP status and the frequency of such checks on a risk-based approach.                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 9           |          |
| PEP status timeline             | The policy must specify that screening for PEP status should be carried out within 30 days from when a player reaches the deposit threshold even if PEP screening would have already been carried out.                                                                                                                                    | The policy must specify that screening for PEP status should be carried out within 30 days from when a player reaches the deposit threshold even if PEP screening would have already been carried out.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 9           |          |
| Identifying a PEP               | The policy must explain the procedure that needs to be followed when a PEP is identified, including the procedure for obtaining senior management approval, establishing the player's source of wealth and, where applicable, their source of funds and conducting enhanced on-going monitoring of the customer's activity.               | The policy must explain the procedure that needs to be followed when a PEP is identified, including the procedure for obtaining senior management approval, establishing the player's source of wealth and, where applicable, their source of funds and conducting enhanced on-going monitoring of the customer's activity.                                                                                                                                                                                                                                                                                                                                                                     | 5           |          |
| Gathering information           | The policy must set out the procedure to be followed and the sources which will be used to gather and obtain information on the Purpose and Intended Nature of the Business Relationship and build a business and risk profile for the different player risk categories.                                                                  | The policy must set out the procedure to be followed and the sources which will be used to gather and obtain information on the Purpose and Intended Nature of the Business Relationship and build a business and risk profile for the different player risk categories.                                                                                                                                                                                                                                                                                                                                                                                                                        | 9           |          |
| Medium and High risk customers  | The policy must specify the minimum information that shall be obtained on medium and high risk customers, including supporting evidence when it comes to high risk customers.                                                                                                                                                             | The policy must specify that as a minimum the following information on medium and high risk customers shall be obtained, including supporting evidence when it comes to high risk customers:<br>(1) information on the nature of and details concerning the customer's business / occupation / employment<br>(2) any other activity in addition to (1) above from which the customer derives his/her wealth (e.g., inheritance);<br>(3) the expected source and origin of the funds to be used throughout the business relationship; and<br>(4) the anticipated level and nature (including expected value and frequency of transactions) that is to be undertaken throughout the relationship. | 9           |          |
| Ongoing monitoring              | The policy must lay down the procedure to be adopted to ensure that any player related documents, data or information held by the Licensee are reviewed and kept up-to-date.                                                                                                                                                              | The policy must lay down the procedure to be adopted to ensure that any player related documents, data or information held by the Licensee are reviewed and kept up-to-date.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 9           |          |
| Transaction monitoring          | The policy must list the procedures and measures to be applied when carrying out scrutiny of transactions based on the level of customer risk, as well as the timing intervals to carry out the scrutiny of transactions based on the level of customer risk.                                                                             | The policy must list the procedures and measures to be applied when carrying out scrutiny of transactions based on the level of customer risk, as well as the timing intervals to carry out the scrutiny of transactions based on the level of customer risk.                                                                                                                                                                                                                                                                                                                                                                                                                                   | 9           |          |
| EDD scenarios                   | The policy must list the circumstances and scenarios in which enhanced due diligence (EDD) would need to be carried out. This shall include PEPs, high risk rated customers, customers linked to high risk and non-reputable jurisdictions and customers using multiple payment methods.                                                  | The policy must list the circumstances and scenarios in which enhanced due diligence (EDD) would need to be carried out. This shall include PEPs, high risk rated customers, customers linked to high risk and non-reputable jurisdictions and customers using multiple payment methods.                                                                                                                                                                                                                                                                                                                                                                                                        | 9           |          |

## Responsible Gaming Policy

| Title                                | Description                                                                                              | Instruction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | Criticality |
|--------------------------------------|----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Registration form self-attestation   | Registration form self-attestation                                                                       | The player is required to self-attest their date of birth upon registration.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                            | 9           |
| ID verification procedure            | ID verification procedure                                                                                | The RG policy must outline the procedure carried out by the operator to verify the player's age.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        | 9           |
| Account closure procedure            | Account closure procedure upon the operator becoming aware that the player is a minor post-registration. | The RG policy must outline the procedure for post-registration account closure upon the operator becoming aware that the player is a minor.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 9           |
| Record-keeping                       | Record-keeping                                                                                           | The RG policy must state the operator's record-keeping policy.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 9           |
| RG page accessibility                | RG page clearly identifiable and accessible                                                              | The site homepage must have a link to the RG page.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 9           |
| RG tools accessibility               | Direct access to all RG tools                                                                            | The player must be able to access all RG tools through their player account settings and/or the RG page.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 9           |
| Contacting the operator              | Procedure on how the player can contact the operator regarding RG concerns via email or chat             | The RG policy must describe the procedure for how the player can contact the operator regarding RG concerns via email or chat.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 9           |
| Language                             | Must be available in English and target market language                                                  | The RG page/policy must be available in English and the site's target market language.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9           |
| Link to RG section                   | Clear and visible link to the RG section must be present on the homepage                                 | The site homepage must have a link to the RG page.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 9           |
| RG reference in T&Cs                 | RG section reference on the T&Cs                                                                         | The T&Cs must make reference to the RG section available on the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 9           |
| Information available to players     | Players must be informed about the RG tools available                                                    | The T&Cs must inform the player about the RG tools available on the site.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 9           |
| Underage gambling visual             | Visual Indication that under-age gambling is prohibited                                                  | The site footer must clearly display an "18+" sign.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 9           |
| Company details                      | Name and registered address of the license holder                                                        | The site footer must clearly identify the name and registered address of the licensed operator's Curacao registered entity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 9           |
| License number                       | Official license number issued by the CGA                                                                | The site footer must clearly display the official license number issued by the CGA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 9           |
| CGA's regulatory oversight           | Statement confirming the regulatory oversight of the operations by the CGA                               | The site footer must clearly display a statement confirming the regulatory oversight of the operations by the CGA.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 9           |
| Link to RG section                   | Link to the RG section                                                                                   | The site footer must contain a link to the site's RG section.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 9           |
| CGA dynamic seal                     | The operator's CGA dynamic seal                                                                          | The site footer must clearly display the CGA dynamic seal, in line with the instructions for the display of the dynamic seal.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 9           |
| Links to support resources           | Direct link to gambling addiction support resources                                                      | The site footer must contain a direct link to gambling addiction support resources.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 9           |
| Player records                       | Players must be able to access a detailed record of their betting and wagering history                   | Players must be able to access a detailed record of their betting and wagering history through their player account.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 9           |
| Self-Assessment tools                | Self-Assessment tools made available to players                                                          | Players must have access to self-assessment tools.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 9           |
| Vulnerable gamblers                  | RG policy should include a structured process on flagging potential vulnerable gamblers                  | The RG policy must include a structured process on flagging potential vulnerable gamblers.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                              | 9           |
| Indicators of problem gambling       | Must have a structured process for responding to indicators of problem gambling                          | <p>The RG policy must contain a structured process for responding to indicators of problem gambling. The key monitoring factors include:</p> <ul style="list-style-type: none"> <li>- Deposit and wagering frequency</li> <li>- Repeated failed transactions due to insufficient funds</li> <li>- Reversing withdrawals</li> <li>- A pattern of inexplicable extended play sessions</li> <li>- Unreasonable increased communication with customer support, including requests for bonuses</li> <li>- Frequent changes to RG tools</li> <li>- Players maxing out a credit card</li> <li>- Attempts to open multiple accounts to bypass deposit or loss limits</li> </ul> | 9           |
| Player profiling and Risk Assessment | Establish player profiles to assess risk levels                                                          | The RG policy must establish player profiles to assess risk levels                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                      | 9           |
| Monitoring and intervention          | Adopt RBA to determine level of monitoring and intervention                                              | The RG policy must adopt RBA to determine level of monitoring and intervention                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 9           |
| Recording RG interactions            | Record all RG interactions in PAM system                                                                 | The RG policy must state that the operators records all RG interactions in the PAM system                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 9           |
| Identification of vulnerable persons | Procedure to follow for players identified as vulnerable persons                                         | The RG policy must define the procedure to be followed for players identified as vulnerable persons                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | 9           |
| Cooling-off period                   | Operator must offer players option to activate a cooling-off period                                      | The operator must offer players the option to activate a cooling-off period                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                             | 9           |

|                                         |                                                                                                                                            |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     |   |
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| Cooling-off options                     | Options for cooling-off must include duration and marketing opt-out at minimum                                                             | The options for cooling-off may include Duration, brand, vertical and marketing, of which the duration and marketing opt-out are mandatory. Furthermore, the duration must be for a minimum of at least 24 hours                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | 9 |
| Self-Exclusion                          | Operator must offer players the option to self-exclude themselves for a duration of at least 1 year                                        | Operator must offer players the option to self-exclude themselves for a duration of at least 1 year                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 9 |
| Self-Exclusion applicability            | Self-Exclusion must automatically exclude the player from all gambling activity                                                            | Self-Exclusion must automatically exclude the player from all gambling activity, including:<br>- All brands/domains operated by the licensee;<br>- All gaming verticals;<br>- All marketing materials                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 9 |
| Self-Exclusion procedure                | Players must be able to initiate and complete the self-exclusion process fully online                                                      | Players must be able to initiate and complete the self-exclusion process fully online                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                               | 9 |
| Deposit Limits                          | Players must be able to set limits on the total amount they deposit                                                                        | Players must be able to set limits on the total amount they deposit                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                 | 9 |
| Training and Staff Readiness            | Operators must train customer service and Responsible Gaming staff to handle player interaction professionally and effectively             | Training should cover, at least:<br>- Recognizing signs of gambling distress<br>- Conducting sensitive and structured conversations with at-risk players<br>- Directing players to appropriate support resources and RG tools                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                       | 9 |
| Consumer Advertising and Marketing      | Operators must not engage in irresponsible advertising                                                                                     | The RG policy must state that the operator must not engage in irresponsible advertising, including:<br>- No targeting of Vulnerable Groups<br>- No portrayal of Gambling as an Investment<br>- No misrepresentation of Skill vs Chance<br>- No Emotional Manipulation<br>- Marketing materials must not feature minors or depict them engaging with gambling content<br>- No explicit content<br>- No encouragement of Unrelated Harmful Behaviours<br>- Bonuses and promotions must be communicated transparently<br>- Operators must not use bonuses to encourage excessive gambling<br>- Operator is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors, social media influencers<br>- Operator must make any contracted third-party aware of their RG policy<br>- All advertising must include a clearly visible RG message or slogan | 9 |
| Internet Filtering Tools                | The operator is advised to remind adults that they should take precautions when sharing devices with minors                                | The operator is advised to remind adults that they should take precautions when sharing devices with minors, such as safeguarding usernames, passwords and payment details.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 2 |
| Sharing links to third-party software   | The operator may consider sharing links to third-party software that can help restrict access to gambling websites                         | The operator may consider sharing links to third-party software that can help restrict access to gambling websites. Examples that are available for website blocking include:<br>- BetBlocker; betblocker.org<br>- GamBlock; gamblock.com<br>- Gamban; gamban.com                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 2 |
| Notifications for concerning behaviours | Operators may employ automatic or manual pop-up notifications in response to concerning behaviours                                         | Operators may employ automatic or manual pop-up notifications in response to concerning behaviours                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 4 |
| Initiating direct contact               | When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the operator must initiate direct contact       | When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the operator must initiate direct contact                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                | 8 |
| Other Limits                            | Other limits may be considered including loss limits, time limits or wager limits, in line with the operator's target player and/or market | Other limits may be considered including loss limits, time limits or wager limits, in line with the operator's target player and/or market                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 4 |
| Reality Check                           | Reality check measures can be implemented without compromising the user experience, however, if used, they must be fit-for-purpose         | Reality check measures can be implemented without compromising the user experience, however, if used, they must be fit-for-purpose and measures include:<br>1. Real-time session timer that remains visible at all times when the player is logged in;<br>2. Real-time clock in the player's time zone;<br>3. Periodic pop-up reminders or prompts about session duration;<br>4. Player-Activated Reality Checks which can be customized to activate at specific time intervals. Custom messages should clearly indicate how long the player has been playing and display the player's winnings and losses during that period.                                                                                                                                                                                                                                                      | 4 |

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### Player Complaints Policy

| Title                                            | Description                                                                                                                                                                                                                                                                                                                                                                                                                                                                                     | Instruction                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    | Criticality |
|--------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| Legal action restrictions                        | Except if mutually agreed under specific terms of ADR (Clause 5 of the Player Complaints Policy Guideline), the operator must not restrict the rights of the player him/herself to take legal action.                                                                                                                                                                                                                                                                                           | Except if mutually agreed under specific terms of ADR (Clause 5 of the Player Complaints Policy Guideline), the operator must not restrict the rights of the player him/herself to take legal action.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          | 9           |
| Terms and Conditions                             | It is the responsibly of the operator to make the role of the CGA clear to the player in the Terms and Conditions.                                                                                                                                                                                                                                                                                                                                                                              | It is the responsibly of the operator to make the role of the CGA clear to the player in the Terms and Conditions:<br>1. The CGA will not resolve or make decisions on any player complaints regarding gambling-related transactions on the operator's website(s).<br>2. Unless deemed to be inadequately handled, the decisions made by the operator and/or ADR provider will not be subject to reviewing and/or overturning by the CGA.<br>3. Notwithstanding 1. and 2. above, the operator must not restrict the player's ability to contact the CGA directly with regard to matters including but not limited to malpractice, breach of license conditions or whistleblowing.<br>4. While the CGA does not mediate in individual disputes, it will use the information to support its supervisory and enforcement actions. | 9           |
| Timeline for RG-related complaints               | Operators must use best in efforts to resolve these cases within five business days.                                                                                                                                                                                                                                                                                                                                                                                                            | Operators must use best in efforts to resolve these cases within five business days.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                           | 9           |
| Extension of timeline for RG-related complaints  | If more time is needed by the operator to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two weeks.                                                                                                                                                                                          | If more time is needed by the operator to make a reasonable and informed decision, players must be informed of the delay, which cannot exceed two weeks. If a delay is due to a lack of or a slow response from the player, the resolution period may be extended by no more than a further two weeks.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | 9           |
| T&Cs inclusion                                   | Full details of the ADR process must be included in the operator's Terms and Conditions.                                                                                                                                                                                                                                                                                                                                                                                                        | The full details of the ADR process must be included in the operator's Terms and Conditions.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 9           |
| Recommencing ADR process with a different entity | Once ADR process is completed it cannot be recommenced by either the player or the operator with another different ADR entity.                                                                                                                                                                                                                                                                                                                                                                  | The policy must state that once the ADR process is completed it cannot be recommenced by either the player or the operator with another different ADR entity.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                  | 9           |
| Recommencing dropped ADR processes               | In the event that the player drops out of the ADR process (but it has already begun) – it should be noted the player should not have the right to resurface the dispute in the future.                                                                                                                                                                                                                                                                                                          | The policy must state that in the event that the player drops out of the ADR process (but it has already begun) the player should not have the right to resurface the dispute in the future.                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                   | 9           |
| Restrictions on ADR escalation                   | Provision of ADR services by the operator is mandatory. If the operator sets ADR parameters in order to prevent abuse (such as whether ADR must be undertaken before a player can initiate legal proceedings, the binding nature of the ADR outcome on the player, or whether there is a minimum claim value required for escalation to ADR), the CGA advises the operator to carefully consider these conditions and seek independent legal advice regarding any applicable civil legislation. | Provision of ADR services by the operator is mandatory. If the operator sets ADR parameters in order to prevent abuse (such as whether ADR must be undertaken before a player can initiate legal proceedings, the binding nature of the ADR outcome on the player, or whether there is a minimum claim value required for escalation to ADR), the CGA advises the operator to carefully consider these conditions and seek independent legal advice regarding any applicable civil legislation.                                                                                                                                                                                                                                                                                                                                | 9           |

[illegible]

## Information Security Policy

| Title               | Description                                                                                                                                      | Criticality |
|---------------------|--------------------------------------------------------------------------------------------------------------------------------------------------|-------------|
| ISP                 | Information Security Policy, including details about:<br><i>(Exempt if holding relevant ISO Certificate)</i>                                     |             |
| Objectives          | Information Security Purpose and Objectives <i>(Integrity, Confidentiality and Availability of information)</i> ;                                | 9           |
| Data Classification | Data Confidentiality including Data Classification and Access Control Policy (outlining the levels of authority per role over data and systems); | 9           |
| Network Security    | Network Security (Including Access Controls, Segregation and Security of Network Services);                                                      | 9           |
| Security Awareness  | Security awareness and behaviour including acceptable use policy, email/communication use policy and personal and mobile devices policy;         | 9           |
| Training            | Training, Responsibilities, rights and duties of personnel.                                                                                      | 9           |

| Comments   |
|------------|
|            |
| 13.1       |
| 5          |
| various    |
| various/15 |
| 15         |

It is essential that policies have not been tested on ongoing operations since the applicant is not live.

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**Review Date**

