

HIGHBET B. V.

Abraham Mendez Chumaceiro Blvd. 03, Willemstad, Curacao

Responsible Gaming Policy (the “Policy”)

Version	Status	Date approvement	Comments	Approver
1.0	Approved	May 30, 2025	Initial Policy Creation	Andrii Zabiaka

Policy Ownership

- **Policy Owner: Highbet B.V.**
- **Created by: Compliance Officer**
- **Approved by: Andrii Zabiaka / Managing Director**
- **Reviewed by: Ihor Kaidan / Responsible Gambling Officer**
- **Date of Creation: February 24, 2025**
- **Last Reviewed: May 30, 2025**
- **Review Frequency: Annual**

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Responsible Gaming (RG) Policy Highbet B.V.

1. Purpose & Scope

This policy explains how we ensure gambling stays an enjoyable form of entertainment, protect vulnerable persons, and comply with the CGA “**Responsible Gaming Policy for Licensed Operators**” (17 Apr 2025) requirements. It covers Curaçao-licensed operations of Highbet B.V. and applies to every employee, contractor and affiliate involved with these brands.

2. Governance

- **Responsible Gaming Officer (RGO)** – Ihor Kaidan, appointed ahead of the CGA deadline. Holds day-to-day responsibility for RG controls and at least yearly reporting to senior management, as required by section 3 of the CGA framework.
- **Senior Management** – ultimate accountability; reviews policy effectiveness annually.
- **All Staff** – must complete mandatory RG training and follow this policy.

3. Player Information & Accessibility

Each site hosts a clearly labelled Responsible Gaming Section in English and the relevant target-market language, always one click from the homepage.

The section contains:

- 24/7 access to self-exclusion, cooling-off, limit-setting and other RG tools.
- Prominent links to international help organisations (Gamblers Anonymous, GamCare, GambleAware) and local support services for each market.
- Contact options (email/chat) for RG queries.

The footer of every page displays an 18+ icon, CGA licence number, name, and company address, the CGA digital seal, and a short RG message, link to the RG section, link to the international and local support web-sites, fulfilling)(section 6.4).

4. Age verification (CDD procedure)

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4.1 Legal Age Restriction

Participation in games of chance is allowed only for persons aged 18 years or older. The Company applies a zero-tolerance policy toward under-age gambling and embeds preventive controls throughout the player life-cycle.

4.2 Initial Age Declaration

During account creation, the player must:

- Enter their date of birth; and;
- Actively tick the mandatory 18+ confirmation box.

Any attempt to register with a date of birth indicating the player is under 18 is automatically rejected.

4.3 Proof of age & identity verification

Players must upload a valid, government-issued photo ID (passport, national ID card or driver's licence):

- once their cumulative deposits reach the regulatory threshold (currently NAf 4 000), or;
- before their first withdrawal, whichever occurs first.

While the account is in Pending Verification status no further deposits or withdrawals are permitted. Verification is completed by trained staff.

4.4 Supplementary electronic verification (optional)

To expedite the process, the Company may employ:

- payment-method validation;
- selfie or other biometric matching.

These tools assist but do not replace the requirement to approve a government-issued ID.

4.5 Action upon discovery of a minor

If it is established that a registered player is under 18:

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- The account is closed immediately;
- All deposits are refunded and any winnings voided;
- The player is informed in writing of the reason;
- The incident is logged in the AML / SAR register for audit and reporting purposes.

4.6 Record keeping requirements

All documentation and system logs relating to age verification are retained for at least ten years and are made available to the Curaçao Gaming Authority upon request.

5. Player-Facing Tools (Current Status)

- **Self-Exclusion** – Available on all brands via the RG Section. Durations: 1 day – 1 year on lope.bet and 1 day – lifetime on favbet.com. Long-term (≥ 1 year) options will be extended across all brands in line with CGA (section 9.2). Reactivation only on written player request; never automatic.
- **Cooling-Off** – CGA-compliant options (24 h, 7 d, 1 m, 3 m) plus 6-month choices. Cooling-off accounts reactivate automatically after the chosen period (section 9.1.7).
- **Deposit Limits** – Daily, weekly and monthly limits live. Loss, wager and session-time limits are already live on all brands. Requests to raise these limits take effect immediately and all requests dealing with the decrease take effect only after a 24-hour cooling-off period, in accordance with CGA (section 10.1).
- **Reality Checks & Session Timers** – Hourly pop-ups active; persistent on-screen timer to be added (section 13.4).
- **Self-Assessment** – Gamblers Anonymous 20-question quiz available; CAGE questionnaire integration planned (section 7).
- **Operator-Initiated Exclusion** – We may exclude players showing severe risk indicators or engaging in criminal activity, with documentation retained ≥ 5 years (section 9.3).

6. Player Risk Assessment

This section operationalises CGA (section 8.2.1) “Player Profiling and Risk Assessment” requirements, creating a structured, data-driven process to identify and mitigate gambling-related harm.

6.1 Objective

To classify every active player’s exposure to gambling-related harm as **Low**, **Medium** or **High** risk and trigger proportionate protective actions before harm occurs.

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6.2 Data Inputs

Real-time and batch data are ingested from the Player Account Management (PAM) system:

Indicator	CGA Ref.	Examples
Deposit & wagering volatility	8.1	Sudden 200%+ deposit spike week-on-week
Session duration & frequency	8.1	> 6 hours continuous play or > 12 log-ins/day
Reversed withdrawals	8.1	≥ 3 reversals within 30 days
Failed payment attempts	8.1	> 5 declines in 24 h
Repeated limit changes	8.1	Two or more limit removals within 30 days
Customer-support sentiment	8.1	Agitation, bonus begging, financial distress keywords
Multi-account / device patterns	8.1	Account/device mismatch flags
External factors	2.2	High-risk verticals (crypto, high-roller VIP)

6.3 Scoring Methodology

Each indicator is weighted (1-5). A cumulative score auto-ranks players every 24 hours:

- **0 – 4 pts** = Low (green)
- **5 – 9 pts** = Medium (amber)
- **10+ pts** = High (red)

Rules are calibrated quarterly using historical behaviour and harm case reviews. Machine-learning enrichment is scheduled for Q4 2025.

6.4 Escalation Matrix

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Risk Level	Automated Action	Human Follow-Up	Possible Outcomes
Low	None	None	Continue monitoring
Medium	Mandatory RG email + deposit limit reminder	Analyst review within 48 h	Voluntary tool uptake, maintain watchlist
High	Account temporarily frozen; chat prompt to contact RG team	Same-day call or secure message	Cooling-off, self-exclusion, or operator-initiated exclusion

All actions follow the graduated approach in **CGA (section 8.2.2.)**

6.6 Documentation & Audit

Every risk score, trigger, intervention and outcome is:

- Logged against the player in PAM (immutable)
- Retained ≥ 5 years
- Available for CGA on request during audits

6.7 Continuous Improvement

Key metrics (false-positive rate, tool-uptake rate, relapse incidents) are reviewed quarterly. Model updates require RGO version control and the Managing Director's sign-off.

7. Behaviour Tracking & Interventions

Our platform profiles players and flags risk factors such as rapid deposit increases, reversed withdrawals and prolonged sessions, using the indicators set out in section 8.1 of the CGA framework. A graduated escalation protocol (email → optional limits → cooling-off → self-exclusion → operator-initiated exclusion) ensures proportionate responses.

All RG interactions and underlying indicators are logged in the Player Account Management (PAM) system for audit and CGA review.

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Frontline teams perform manual reviews of the behaviour-monitoring module as permitted by section 8.

8. Advertising & Marketing

Marketing must never target minors or vulnerable persons, portray gambling as a solution to financial problems, or mislead about skill vs. chance. Every advertisement carries a clear responsible-gaming message, as required under section 12. Affiliates and influencers receive the RG policy and must adhere to it.

9. Staff Training

All customer-facing, VIP, marketing and RG personnel complete an induction RG course and yearly refreshers covering: recognising signs of harm, sensitive conversations and escalation pathways, in line with section 11.

10. Record-Keeping & Reporting

RG records (tool usage, interventions, exclusions) are retained for a minimum of five years and supplied to the CGA upon request.

The RG Officer submits an annual effectiveness report to senior management; material policy changes are filed via the CGA portal, meeting the obligations in section 2.

11. Continuous Improvement & Implementation Commitment

Many controls outlined above are already live, placing us ahead of the CGA implementation schedule. Any outstanding functionalities—such as aligning extended self-exclusion durations across all brands and enhancing behavioural-tracking analytics—will be delivered strictly in line with the timelines prescribed by the Authority.

Endorsement

This policy has been reviewed and approved by Senior Management and the Responsible Gaming Officer for immediate submission to the CGA.

For and on behalf of Highbet B.V.


Managing Director
Andrii Zabiaka

