

RESPONSIBLE GAMING POLICY

A2F B.V.

Policy Version: 1.0 (Effective: 9 of January 2026)

Legal Entity Name	A2F B.V.
Legal Status	Limited Liability Company (registered under the laws of Curaçao)
Company Number	151745
Registered Address	Abraham Mendez Chumaceiro Boulevard 50, Willemstad, Curaçao
License Number (GCB)	OGL/2024/298/0109
Operational Websites	apostasbf.com / aposrasnow.com / bet-bra.com / betuppro.com / bolsadeaposta.com / captainpunt.com / drinbet.com / fulltbet.com / peakodds.com / punterplay.com / sharpbet.com / superodds88.com / tradeball.com / oddjusta.com
Responsible Office	Compliance Department
Next Review Date	January 2027

1. Policy Statement and Overview

1.1 Purpose of This Policy

A2F B.V. is fully committed to the protection of players and the promotion of responsible gaming practices across all its platforms. This **Responsible Gaming Policy** outlines our strategic, operational, and regulatory framework to ensure that gambling remains an enjoyable and safe activity while minimizing and mitigating the risks associated with problem gambling and gambling-related harm.

This document is prepared in compliance with the **National Ordinance on Games of Chance (LOK)** and the **Responsible Gaming Guidelines** issued by the **Curaçao Gaming Authority (CGA)**. It forms part of A2F B.V.'s core compliance architecture and is binding on all departments, staff, service partners, and affiliates engaged in player-facing operations or responsible gambling risk management.

1.2 Policy Scope

This Responsible Gaming Policy applies to all individuals who interact with A2F B.V. platforms, including:

- Players registered on the websites listed at the beginning of this policy.
- Support and compliance staff responsible for monitoring player behavior
- Contractors, partners, and third-party software providers
- The appointed **Responsible Gambling Officer** and designated escalation staff

It encompasses operational protocols across:

- Account registration and verification
- Deposit and loss limits
- Session monitoring and activity tracking
- Player outreach and intervention
- Marketing practices and promotional design
- Self-exclusion and time-out implementation
- Staff training and internal reporting

1.3 Policy Objectives

The objectives of this Responsible Gaming Policy are to:

- Prevent gambling by minors and unauthorized persons
- Identify and support players who may be at risk of gambling harm
- Equip staff with tools, procedures, and training to intervene appropriately
- Promote transparency, fairness, and player empowerment
- Collaborate with regulatory bodies and public health organizations to advance responsible gambling

A2F B.V. believes that responsible gambling is not merely a legal obligation but a corporate and ethical imperative. As such, we are committed to continuous improvement, data-driven refinement, and integration of best practices.

1.4 Legal and Regulatory Framework

This policy is developed in accordance with:

- **Article 5.3 of the LOK** (Complaints and Responsible Gambling Standards)
- **CGA Responsible Gaming Guidelines** (Version: June 2025)
- Applicable provisions of the **General Data Protection Regulation (GDPR)** and related privacy laws
- Public health guidelines, clinical research, and industry standards in harm prevention

The policy will be reviewed annually, or sooner if there are:

- Changes in legal obligations or CGA directives
 - Emergent risks identified from player data or complaints
 - Industry innovations in prevention or intervention
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1.5 Integration With Other Compliance Policies

This Responsible Gaming Policy is integrated with:

- The **AML/CFT Policy** (to prevent criminal exploitation of player accounts)
- The **Privacy and Data Protection Policy**
- The **Terms and Conditions**
- The **Player Complaints Policy**
- Internal Control Procedures and escalation flowcharts

Together, these documents create a multi-layered framework to ensure player welfare and regulatory compliance across all operations.

2. Commitments to Responsible Gaming

A2F B.V. recognizes that gambling is a form of entertainment which, for a small portion of individuals, may evolve into a problem. Our company is committed to creating and maintaining an operational environment where gambling remains a **voluntary and informed choice**, and where individuals at risk receive timely support.

2.1 Corporate Values and Social Responsibility

A2F B.V. operates under the principle that commercial success must be balanced with player safety and public health outcomes. As a licensed operator under the Curaçao Gaming Authority, we commit to:

- **Ensuring fair and transparent gaming experiences** across all platforms and software
- **Protecting vulnerable players**, including those with pre-existing gambling conditions
- **Educating players** about potential risks, control tools, and where to seek help
- **Designing products and promotions** in ways that do not exploit psychological vulnerabilities
- **Training all personnel** to detect and act upon early signs of gambling-related harm

Responsible gaming is embedded in every tier of the organization—from platform design and user interfaces to customer support and risk oversight.

2.2 Policy Commitments

A2F B.V. commits to the following actionable principles, which are reflected in operational procedures and reporting structures:

Area	Commitment
Minors	Ensure no person under 18 can register, deposit, or access games
Informed Choice	Provide clear information on risks, odds, payout rates, and play history
Player Control	Offer configurable limits (deposit, time, wager, loss)
Self-Exclusion	Provide immediate self-exclusion upon request and enforce rigorously
Behavioral Monitoring	Detect and assess potentially harmful gambling patterns
Staff Readiness	Train all frontline staff in identifying and escalating RG concerns
Data Protection	Treat all responsible gaming records as sensitive personal data
Stakeholder Cooperation	Share anonymized data and insights with RG bodies when appropriate

These commitments are not optional—they are institutionalized through internal controls and embedded in the company’s Standard Operating Procedures (SOPs).

2.3 Cultural and Geographic Sensitivity

A2F B.V. serves a **diverse global customer base**, including regions where attitudes toward gambling vary significantly. Responsible Gaming messaging and tools must be:

- **Localized in language and design** for effective reach
- **Culturally appropriate** to reflect different risk profiles and public attitudes
- **Proactively communicated** through onboarding, promotions, and customer service

We commit to continually adapting our messaging to reflect cultural relevance without compromising our duty of care.

2.4 Ethics in Game and Promotion Design

Promotions, loyalty programs, and game mechanics shall be reviewed to ensure they do not:

- Exploit cognitive biases (e.g., illusion of control, near-miss effects)
- Encourage excessive play or use of misleading urgency (e.g., “limited time only” tactics)
- Make false promises about financial success or risk-free play
- Target players who are known to be excluded, restricted, or previously flagged

Every new campaign or product must pass a **Responsible Gaming Risk Assessment** prior to launch.

2.5 Partnerships and Industry Cooperation

A2F B.V. recognizes that responsible gaming is not achieved in isolation. We commit to engaging with:

- **CGA regulatory initiatives**
- **Non-profit and health-focused organizations** (e.g., GamCare, BeGambleAware)
- **Technology partners**, including software providers, to ensure RG features are built into systems
- **Other licensees**, to share anonymized data and collaborate on early intervention frameworks

Whenever a referral to a non-profit or mental health organization is appropriate, A2F B.V. ensures the player is given clear and confidential options to seek help.

2.6 Funds Handling for Minor Accounts

In the event that an account is identified and confirmed as being registered to or used by an individual under the legal gambling age (a minor), A2F B.V. shall take the following immediate, mandatory, and irreversible steps:

1. The account shall be **immediately closed** and flagged as permanently banned from future registration.

2. All funds deposited by the minor into the account shall be **returned** to the source of the deposit (where possible) or otherwise made available for withdrawal by the minor.
3. Any **winnings or bonuses** accrued from the time of account opening shall be **forfeited** to A2F B.V. and not returned to the minor.
4. The only exception to the return of deposited funds is if those funds are required to be held by law or regulatory obligation (e.g., frozen due to an Anti-Money Laundering (AML) investigation or court order).

3. Player Protection and Prevention Measures

A2F B.V. ensures that players are given the tools, options, and information needed to manage their gambling responsibly. We take a “prevention first” approach, with controls designed not just to treat harm, but to prevent it altogether.

3.1 Account Access Control and Identity Verification

A2F B.V. deploys a tiered identity verification system that aligns with both regulatory requirements and responsible gaming expectations.

- Level 1 Verification is triggered at registration, requiring players to confirm they are 18+ and accept the Terms and Conditions and Responsible Gaming Policy.
- Level 2 Verification requires submission of government-issued ID, proof of address, and payment method validation before withdrawals can be processed.
- Level 3 Verification (Enhanced Due Diligence) is applied to players who reach high cumulative deposit thresholds or exhibit risk behaviors.

All documents are checked manually by trained staff and automatically cross-checked against third-party databases (e.g., age verification and PEP screening tools).

Accounts flagged for suspicious identity patterns are immediately reviewed by the Risk & Compliance Team. Accounts linked to minors or previously excluded individuals are permanently closed and reported to the CGA if appropriate.

3.2 Limit Setting Tools — Enforcement by Design

A2F B.V. offers the following player-configurable limit tools:

Tool	Description
Deposit Limit	Cap on daily/weekly/monthly deposits
Loss Limit	Max loss allowed per defined period
Wager Limit	Total stake cap over time
Session Limit	Total time permitted in a login session

Key Enforcement Features:

- All limit tools are hard-coded into the account management interface.
- Any lowering of limits takes effect immediately.
- Any increase requires a 24-hour cooling-off period and confirmation by the player.
- Limits apply across all platforms and brands using centralized player databases.
- Attempts to bypass limits through multiple accounts or brands are flagged and blocked.

Limit status is visible at all times in the account dashboard, with usage meters and real-time alerts.

3.3 Brand-Wide Synchronization and Single-Player View

To protect players across its ecosystem, A2F B.V. uses a unified player database that synchronizes all RG-related actions:

- If a player self-excludes A2F B.V.'s websites.
- Deposit limits, loss limits, and session restrictions apply across all platforms simultaneously.
- Player notes, staff interactions, RG flags, and document uploads are visible to authorized personnel regardless of which platform the player uses.

This holistic approach ensures that players cannot inadvertently or deliberately sidestep controls by moving between brands.

3.4 User Interface (UI) and Behavioral Nudging

Our RG tools are designed not just for compliance — but for usability and effectiveness. Key design features include:

- Visual alerts: When players are nearing their limits or session time, a color-coded warning (yellow → red) appears with a reminder and actionable link.
- Mandatory interaction: To continue play, users must actively acknowledge the message (e.g., “Yes, I understand and want to continue”).
- Exit prompts: If a player exceeds defined thresholds (e.g., more than 6 hours in session), they are shown a page encouraging them to log out or contact support.
- Limit settings auto-reminders: Every 30 days, players receive an automated message summarizing their current limits and offering a review option.

These behavioral nudges are designed using psychological research on self-regulation and player fatigue.

3.5 Notifications and Education Built Into Play

Education is not limited to the RG page. On all platforms, the following persistent support layers are built into the player experience:

- A dedicated RG icon visible on every page
- Quick access to limit-setting in the footer and game menus
- Periodic email tips (“Play smart, stay in control”) sent based on account activity
- Monthly account summary emails showing deposits, withdrawals, time spent, and tool usage

These are not hidden away — they are embedded into the interface so that players are continually supported in staying informed and in control.

4. Monitoring Player Behavior and Risk Detection

Monitoring is at the heart of early intervention. At A2F B.V., we use a dual-system approach that combines **real-time data analysis** with **human case evaluation** to ensure high-risk behavior is detected early and managed responsibly.

4.1 Multi-Layer Behavioral Monitoring System

4.1.1. A2F B.V. has developed and implemented a proprietary **Real-Time Risk Monitoring Engine (RRE)**, which scans live user behavior for markers associated with problem gambling. Key indicators include:

- Increasing frequency or intensity of play (e.g., multiple logins per day, shorter time between sessions)

- Rapid escalation in stake size or deposit frequency
- Repeatedly canceling withdrawal requests
- Playing through the night (e.g., active between 01:00–06:00 user time)
- Reversals in account balance (e.g., large win followed by immediate losses)
- Trigger words in chat support or search bar (e.g., “desperate,” “help,” “lost everything”)

The system uses **machine learning** to adapt to emerging patterns and player behaviors over time. It assigns a **Player Risk Score (PRS)** that is recalculated after every session and transaction.

4.1.2. Player Self-Assessment Tool

To empower players to self-monitor their gambling habits and assess their own risk profile, A2F B.V. provides immediate and free access to a recognized self-assessment questionnaire.

This tool, which utilizes questions based on established instruments such as the **Gamblers Anonymous 20 Questions** or the **CAGE Questionnaire**, is made available:

1. Prominently displayed within the "Responsible Gaming" section of the website.
2. Linked directly from the player's account settings interface.

The self-assessment is confidential, and the results are for the player's information only. Following completion, the tool will provide immediate, objective feedback and direct links to our full suite of player protection tools (e.g., limits, cooling-off) and external support services (e.g., counseling).

4.2 Risk Scoring Tiers and Escalation Protocols

Based on their PRS and other indicators, players are classified into four monitoring tiers:

Risk Tier	Description	Monitoring Action
Tier 0 – No Risk	No abnormal behavior detected	Passive background monitoring
Tier 1 – Mild Risk	Slight deviation from norms (e.g., increasing deposits)	Flagged for automated email or dashboard alert

Risk Tier	Description	Monitoring Action
Tier 2 – Elevated Risk	Multiple risk markers detected	Reviewed by human analyst within 48 hours
Tier 3 – Critical Risk	Self-exclusion, RG complaints, signs of harm	Immediate human intervention and case lockdown

All Tier 2 and Tier 3 cases are manually reviewed by a **Responsible Gambling Analyst** trained in behavioral profiling.

4.3 Case Management and Resolution Timeline

Once a Tier 2 or 3 alert is raised:

1. A case file is opened and assigned a unique tracking number.
2. The player's full history is reviewed (sessions, transactions, previous contacts, limit changes).
3. The assigned analyst must provide a recommendation within:
 - **48 hours** for Tier 2 cases
 - **12 hours** for Tier 3 cases
4. The case file is reviewed by the **RG Oversight Manager** before final decision.

Cases are closed with one of the following outcomes:

- No action (false positive)
- Soft contact made (email or chat nudge)
- Limits imposed or recommended
- Temporary account suspension
- Referral to intervention (see Section 5)

All actions and decisions are logged with timestamp, responsible staff member, and internal notes.

4.4 Staff Reporting Tools

In addition to automated systems, A2F B.V. empowers all staff to manually flag accounts. Our **Internal Concern Reporting Form** allows employees to:

- Log notes about phone or chat interactions
- Report strange or erratic behavior
- Flag players who request limits but keep increasing them
- Highlight repeated complaints linked to gambling stress

Staff who report concerns in good faith are protected from reprisal and praised as part of our accountability culture.

4.5 Proactive Monitoring Campaigns

Every quarter, A2F B.V. runs targeted reviews based on system-wide trends. These campaigns analyze:

- Accounts with >10 deposits in 72 hours
- Users active for 4+ consecutive hours per day
- Players who consistently reject or remove RG tools

Findings are used to refine our risk models, trigger outbound awareness campaigns, and update training materials.

4.6 Payment Method Restriction

Upon activation of any self-exclusion period, A2F B.V. will immediately and automatically block all known payment methods (including, but not limited to, credit/debit cards, e-wallets, and bank accounts) previously used for deposits by the self-excluded player. This restriction is implemented to prevent any circumvention of the self-exclusion by attempting to fund a new or existing account using the same financial instruments. The block will remain effective for the entire duration of the self-exclusion.

4.7. Cooling-Off / Time-Out Facility

A2F B.V. provides an accessible **Cooling-Off** facility that allows players to take a short, temporary break from gaming. This tool is available and prominently displayed within the player account settings and is designed for immediate activation without the need for support staff intervention.

In accordance with the Curaçao Gaming Authority (CGA) requirements, players must be offered the following four specific, predetermined, and irreversible Cooling-Off periods:

1. **24 Hours** (One Day)

2. **7 Days** (One Week)

3. **1 Month**

4. **3 Months**

During the selected Cooling-Off period, the player's account will be inaccessible for all gaming activities, depositing, and receiving marketing communications. The player account will automatically reactivate upon the expiry of the selected period.

5. Interventions, Support, and Referrals

Detection is only half of the responsible gambling framework — effective intervention is what ultimately protects players. A2F B.V. employs a multi-tiered intervention model grounded in behavioral science, clinical research, and best practices in regulatory enforcement.

5.1 Tiered Intervention Response Framework

Once a player has been flagged by our system or manually by staff, a Tiered Response Protocol is activated. Each level reflects the severity and urgency of observed behaviors.

Tier	Risk Category	Trigger Examples	Intervention Response
Tier 1 – Caution	Mild behavior changes	Small but steady deposit increases; late-night sessions	Automated message with links to limit tools and RG resources
Tier 2 – Warning	Multiple indicators	Canceled withdrawals, ignored time reminders, prolonged play	Personalized message; offer limits or time-out; restrict bonus eligibility
Tier 3 – Critical	High-risk or confirmed harm	RG-related complaint, chat mentions of loss of control, signs of addiction	Phone call or chat outreach; mandatory session pause; enforced cooling-off period or exclusion
Tier 4 – Emergency	Severe harm risk	Threats of self-harm, third-party complaint (e.g., family), suicidal language	Immediate account suspension; referral to mental health professionals; report to CGA if required

Each escalation level requires staff validation and supervisor review before action is finalized.

5.2 Staff Scripts and Motivational Interviewing

All staff tasked with direct player contact receive training in Motivational Interviewing (MI) — a structured communication technique designed to help individuals recognize risky behavior without triggering defensiveness or shame.

Key MI Techniques Used:

- Open-ended questions: “What led you to gamble more this week?”
- Affirmations: “You’ve taken a responsible step by talking to us.”
- Reflective listening: “It sounds like you’ve been using gambling as a way to cope.”
- Summarizing: “You’ve told us you feel stressed, and that you’re playing more than you want. Let’s look at some tools that can help.”

Scripts include guidance for redirecting players to self-help options, and how to gracefully end a session if harm escalates.

5.3 Follow-Up Process and Player Re-Engagement

After an intervention, follow-up is essential to determine:

- Whether the player took recommended actions (e.g., set limits, self-excluded)
- Whether further risk signs have emerged
- Whether the player has relapsed or returned to safe play

Follow-Up Timeline:

- Within 72 hours of Tier 2 or 3 contact: automated email check-in
- Within 1 week: manual review of account activity
- Within 14 days: escalation if behavior does not improve or if the player re-engages unsafely

A player who returns after self-exclusion must:

- Complete a self-assessment
- Undergo a 7-day cooling-off period
- Receive mandatory human review before reactivation

5.4 Case Management and Record Keeping

Every intervention generates a confidential case file containing:

- Player communication logs (chat/email/phone)
- Action taken (limits applied, bonuses removed, referrals made)
- Staff involved and timestamps
- Outcome, including any return to play

Files are stored securely and retained for at least seven (7) years.

Case files are regularly audited to:

- Ensure consistency in decisions
- Identify gaps in procedure
- Improve training based on real-world examples

5.5 Referral to Support Services

A2F B.V. recognizes that we are not a treatment provider. Our role is to identify, intervene, and refer. Players identified as high-risk are referred to specialized services depending on region and language:

Country/Region	Referral Partner	Description
Global	Gambling Therapy	Multilingual online counseling and advice
UK	GamCare	Live chat, phone line, in-person support
EU	BeGambleAware	Education and treatment referrals
Canada	ConnexOntario	Confidential support and treatment links
Other	Local helplines	Provided based on IP or declared residence

Support contact details are provided directly to the player in their preferred language (where available) and logged in the case file.

6. Marketing and Advertising Standards

Responsible marketing is a core pillar of harm prevention. A2F B.V. is committed to conducting all promotional activity ethically, transparently, and in a way that respects player wellbeing — particularly for those who are vulnerable or at risk.

This section describes how A2F B.V. aligns its marketing practices with both the spirit and letter of responsible gaming regulation.

6.1 Core Ethical Principles

All marketing, regardless of medium, must adhere to the following principles:

- Truthfulness: Promotions must be accurate, clearly worded, and free from exaggeration or deception.
- Transparency: All terms and conditions must be clearly accessible before a player opts in.
- Non-Exploitation: No marketing may target vulnerable groups, such as minors, self-excluded individuals, or players with known RG flags.
- Entertainment-Oriented Messaging: Campaigns must emphasize that gambling is a leisure activity, not a source of income or solution to personal problems.
- Informed Consent: Players must explicitly opt in to receive marketing, and opt-out functionality must be respected across all channels.

6.2 Examples of Prohibited Content

A2F B.V. explicitly prohibits marketing content that includes:

- Claims of guaranteed wins or income (“This system always works!”)
- Language suggesting urgency or fear of missing out (“Don’t miss your last chance to become rich!”)
- Emotional triggers (“Are you tired of being broke?”)
- Implying gambling is a solution to life stressors (“Let us change your luck today!”)
- Testimonials that promote unrealistic success

Visual content must avoid:

- Imagery of excessive wealth, luxury lifestyles, or gambling-related highs
- Characters or animations that may appeal to minors
- Misleading elements that make RNG-based games seem skill-based

6.3 Review and Approval Process for Campaigns

All campaigns — including email sequences, SMS messages, banners, pop-ups, bonus offers, affiliate packages, and social media content — must pass through a mandatory compliance review workflow:

1. Pre-launch checklist completed by marketing team, confirming:
 - Age-appropriate content
 - Terms clarity and visibility
 - Avoidance of banned phrases
2. RG Review by Compliance:
 - Analysis of potential RG impact
 - Verification of exclusion database filtering
 - Manual testing of opt-out links
3. Final approval by Marketing Compliance Manager

Campaigns that do not pass compliance review are halted and sent back for revision.

A record of every review is maintained in a Marketing Audit Log, including reviewer name, timestamp, and campaign assets.

6.4 Affiliate Monitoring and Accountability

A2F B.V. partners only with affiliates who:

- Sign the Affiliate Code of Conduct, which includes RG clauses
- Submit creatives for pre-approval
- Provide landing page previews prior to going live

Any affiliate who:

- Targets minors
- Uses false promises or fake testimonials
- Sends marketing to excluded players

...will be immediately suspended, investigated, and reported to the CGA if applicable. Repeat violations result in permanent disqualification and account closure.

Affiliate activity is monitored by:

- Web crawling tools scanning brand name usage

- Manual review of backlinks, keywords, and complaints
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6.5 Bonus Design and Ethical Promotions

Bonuses and loyalty programs must be designed in a way that supports responsible play. This includes:

- Clearly stated wagering requirements
- Maximum bet rules to prevent chase behavior
- Transparent bonus expiry dates
- Prohibition of “near-miss” mechanics or mystery bonuses that mimic gambling disorder patterns
- RG notices embedded in bonus banners (e.g., “Bonus play is fun, but not a guarantee.”)

Before launch, each promotion is evaluated for:

- Potential to encourage excessive play
 - Suitability for low- and high-risk players
 - Appeal to players who may already be using self-limits
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6.6 Communications With Excluded or RG-Flagged Players

A2F B.V. enforces absolute marketing restrictions for any player who:

- Is currently self-excluded (temporary or permanent)
- Has RG flags noted in their profile
- Has opted out of marketing during registration or via the dashboard

Systems synchronize daily across:

- Email marketing platforms
- CRM systems
- Push notification engines
- SMS and phone outreach tools

Contacting a self-excluded player is treated as a serious breach and subject to internal investigation, reporting, and CGA disclosure if harm occurs.

7. Self-Assessment, Tools, and Player Education

Awareness is one of the most powerful defenses against gambling harm. A2F B.V. ensures that players are regularly encouraged to reflect on their behavior, understand the risks, and access tools that support informed decision-making.

7.1 Self-Assessment Questionnaire (SAQ)

A 10-question **Self-Assessment Tool** is provided to all players via the Responsible Gambling page. Based on validated clinical indicators, it invites players to consider:

- Has gambling ever caused you financial worry?
- Do you find it hard to stop once you start playing?
- Have you gambled to escape problems or stress?
- Have you ever lied about gambling to friends or family?

The results are not stored or shared. After completion, players receive:

- An interpretation of their risk level (e.g., low, moderate, high)
- Suggestions to consider self-limits, breaks, or external help

Players flagged as high-risk are shown additional resources and the option to self-exclude.

7.2 Educational Messaging

A2F B.V. integrates responsible gaming messages in the following areas:

- Registration confirmation email
- Welcome and onboarding flow
- Footer of every web and mobile page
- Game loading screens and logout confirmations
- Post-deposit and post-withdrawal emails

Sample messages include:

- “Gambling is entertainment — not a way to make money.”
- “Need a break? Set your session limits here.”
- “You’re in control. Change your deposit limit anytime.”

These messages rotate and are reviewed quarterly to maintain engagement and prevent banner blindness.

7.3 Tool Visibility and Reminders

All player tools (limits, time-outs, exclusion) are:

- Available from the account dashboard
- Prominently listed in the Responsible Gambling menu
- Mentioned in marketing footers and account alerts

A2F B.V. sends **monthly reminders** to all players outlining:

- What responsible gambling tools are available
- How to set or modify limits
- Contact info for help or exclusions

These reminders are sent even if the player has never used a limit before.

8. Training and Accountability

Responsible gaming is not only about player-facing systems — it requires a knowledgeable, alert, and empowered team at every level. A2F B.V. maintains a comprehensive, continuous staff training program that embeds responsible gaming as a core business value.

8.1 Company-Wide Mandatory Training

All employees, regardless of department or seniority, must complete a mandatory Responsible Gaming training module within their first 30 days of employment.

The core curriculum includes:

- Legal duties under CGA and LOK
- How to identify signs of gambling-related harm
- Proper use of internal tools and flags
- Confidentiality requirements
- Steps for handling player inquiries about limits or exclusion

A certification test is issued at the end of training. Failure to pass the test leads to:

- Mandatory remediation session

- Temporary removal from player-facing roles until passed

8.2 Advanced and Role-Specific Modules

Specialist teams (e.g., support, compliance, risk, marketing, affiliates) receive advanced training specific to their responsibilities:

Department	Focus Area
Customer Support	Conversation handling, referral escalation, emergency scenarios
Marketing	Ad review checklists, bonus compliance, audience segmentation
Payments & Risk	Transaction behavior alerts, suspicious deposit analysis
Product & Design	Ethical UI/UX choices, embedded RG tools
Compliance & Legal	Document archiving, CGA response expectations, audit prep

Each department maintains a training compliance scorecard, reviewed quarterly by HR and the RG Oversight Committee.

8.3 Continuous Learning and Performance Review

Responsible Gaming is not “one-and-done.” A2F B.V. maintains:

- Quarterly refreshers with case studies from real player interactions
- Live simulation exercises to prepare for crisis scenarios (e.g., suicidal player, legal request)
- Email bulletins with regulatory updates or procedural changes

RG performance is now a Key Performance Indicator (KPI) for all staff. For example:

- Support agents are reviewed on how well they guide players to limits
- Risk analysts are scored on proper escalation timing
- Managers are evaluated on RG case closure rates

Outstanding RG contributions are recognized through internal awards and bonus programs.

8.4 Management Accountability and Oversight

Managers and directors are not exempt from training. All line managers must:

- Complete the same RG modules as their teams
- Attend one RG strategy session per year
- Submit a department-level RG readiness report every 6 months

Failing to uphold RG policy, either through negligence or mismanagement, is considered a breach of managerial duty.

Internal RG audits include a manager accountability rubric, assessing:

- Resource allocation to RG systems
- Responsiveness to flagged staff behavior
- Timely communication of policy updates to team members

8.5 Whistleblowing and Internal Reporting

A2F B.V. maintains a whistleblower protection program that encourages staff to report:

- Mishandling of self-exclusion requests
- Pressure to ignore RG procedures to retain VIPs
- System bugs that allow limit circumvention

Reports can be submitted anonymously via a secure online form or to the Compliance Officer directly. Verified cases are acted upon, and retaliation is prohibited.

9. Oversight, Auditing, and Continuous Improvement

A2F B.V. ensures that its Responsible Gaming Policy remains functional, evidence-based, and aligned with evolving regulatory expectations. This is achieved through systematic monitoring, internal audits, external review, and a culture of learning.

9.1 Internal Oversight Committee

A designated **Responsible Gambling Oversight Committee** meets every quarter to:

- Review complaint trends and intervention records
- Analyze usage of RG tools (e.g., self-exclusions, limits)
- Discuss updates to CGA policy or global best practices
- Approve or recommend changes to internal procedures

The committee includes:

- The Responsible Gambling Officer (chair)
- Compliance Manager
- Head of Customer Operations
- Marketing Compliance Coordinator
- Legal counsel (as needed)

Meeting minutes are logged, and action items are tracked.

9.2 Internal Audits

Internal RG audits are performed **twice per year** and focus on:

- Policy adherence
- Quality of player interactions and documentation
- Timeliness and outcome of interventions
- Training compliance
- Data integrity

Audit results are summarized in an internal report. Non-conformities trigger a Corrective Action Plan and follow-up review.

9.3 External Benchmarking and Review

A2F B.V. engages external RG consultants or legal specialists annually to:

- Review this policy
- Conduct spot-checks on procedures
- Compare operations to international best practices
- Advise on product design risks

Insights from external reviews are shared with the Oversight Committee and factored into the next policy update.

9.4 Policy Versioning and Accessibility

Each version of this policy is logged, dated, and approved by the Director of A2F B.V.

- The current version is made publicly available on all websites
- Past versions are stored for **five years**
- Players and regulators may request a copy of the policy history at any time

Updates are shared with:

- All staff
- Certified affiliates
- The Curaçao Gaming Authority, upon request or during review cycles

10. Final Provisions

This Responsible Gaming Policy forms an integral part of the operational, legal, and ethical foundation of A2F B.V. and its associated platforms. It is intended to provide:

- A structured and enforceable set of principles for preventing gambling-related harm
- Transparent guidelines for players, staff, partners, and regulators
- A consistent standard of behavior across all departments and decision-making layers

10.1 Applicability

This policy applies to:

- All websites operated by A2F B.V. under Curaçao license OGL/2024/298/0109
- All players, regardless of jurisdiction
- All customer support, marketing, risk, payments, and product personnel
- Contractors and affiliates operating under the A2F B.V. brand

No individual or department is exempt from this policy. Breaches may result in disciplinary procedures, regulatory reporting, or contract termination.

10.2 Regulatory Compliance

This policy is issued in fulfillment of:

- Article 5.3 of the **National Ordinance on Games of Chance (LOK)**
- Curaçao Gaming Authority's **Responsible Gambling Policy Guidelines** (June 2025)
- All applicable local laws on data privacy, consumer protection, and online advertising

In cases where national legislation is more restrictive than this policy, the stricter standard shall apply.

10.3 Conflicts and Precedence

If any conflict arises between this policy and:

- The Terms and Conditions
- The Player Complaints Policy
- Internal operating manuals

then the version that **offers the highest degree of player protection** shall prevail.

10.4 Accessibility and Interpretation

This policy shall be:

- Published publicly in English on all domains operated by A2F B.V.
- Made available in additional languages as needed for accessibility
- Explained to players upon request by support staff

The English version is the legally binding reference in case of interpretation disputes.

10.5 Enforcement and Review

This policy takes effect on **15 September 2025** and remains in force unless superseded by a newer version. It is subject to:

- **Annual review** by the Responsible Gambling Oversight Committee
- Updates as required by CGA notifications or legal developments
- Publication of all material revisions within 30 days of approval

Non-compliance with this policy may trigger CGA investigation, license conditions, or administrative penalties.

11. Signature and Validation

This Responsible Gaming Policy has been reviewed and approved by the Director of A2F B.V. It reflects the organization's full commitment to integrity, player care, and regulatory leadership.

Signed on behalf of A2F B.V.



Marcin Juliusz Wasik

Director

A2F B.V.

Date: 09/01/2026