



# Responsible Gaming Policy

Player protection and harm minimization framework in compliance with CGA responsible gaming requirements.

v1.0

☐ Draft

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1.0 Purpose & Commitment

The operator is committed to promoting responsible gaming and minimizing the potential harms associated with gambling. This policy establishes the standards, tools, and procedures designed to protect players, particularly those at risk of developing gambling-related problems.

The operator recognizes that while the majority of players gamble for entertainment, a small percentage may experience difficulties. The operator has a duty of care to provide tools, information, and support to help players maintain control of their gambling activity.

2.0 Regulatory Framework

- This policy complies with:
- CGA Responsible Gaming Standards and Operating Conditions
  - CGA Player Protection Requirements
  - International responsible gaming best practices and standards
  - Applicable advertising and marketing regulations

3.0 Player Protection Tools

- The operator provides the following tools accessible to all players through their account settings:
- **Deposit Limits:** Daily, weekly, and monthly maximum deposit amounts
  - **Loss Limits:** Daily, weekly, and monthly maximum net loss amounts

- **Wager Limits:** Maximum bet amounts per session or per game
- **Session Time Limits:** Maximum continuous play duration
- **Cooling-Off Period:** Temporary account suspension (24 hours to 6 months)
- **Self-Exclusion:** Voluntary exclusion for defined periods or permanently
- **Account Closure:** Permanent closure upon request

Decreases to limits take effect immediately. Increases to limits are subject to a 24-hour cooling-off period to prevent impulsive decisions.

Each player's situation is reviewed individually by FHP Network B.V., as player protection needs may differ depending on personal circumstances, account history, and risk profile. Players who wish to make general adjustments to their player protection settings may, of their own accord, contact FHP Network B.V. customer support at any time to discuss and request such adjustments.

## 4.0 Deposit, Loss & Wager Limits

Deposit limits, loss limits, and wager limits are determined by FHP Network B.V. on an independent, case-by-case basis. The specific values applied will vary depending on the individual player's profile, risk assessment, account history, and any applicable regulatory requirements. FHP Network B.V. reserves the right to set, adjust, or impose limits at any time at its sole discretion.

**Default Limits:** The operator may set default deposit limits for new accounts based on risk assessment and regulatory requirements.

**Player-Set Limits:** Players can set their own limits at any time through account settings. The system enforces the most restrictive limit applicable (player-set or operator-imposed).

### Limit Modification Rules:

- Decrease in limits: Effective immediately
- Increase in limits: 24-hour mandatory cooling-off period before taking effect
- Removal of limits: Requires review by responsible gaming team; 7-day cooling-off

## 5.0 Self-Exclusion Program

The self-exclusion program allows players to voluntarily exclude themselves from all gaming activity:

- **Temporary Self-Exclusion:** Minimum 6 months, extendable
- **Permanent Self-Exclusion:** Irrevocable for minimum 5 years; reinstatement subject to review

### During Self-Exclusion:

- All gaming accounts are suspended; no deposits or wagers permitted
- All marketing communications are ceased immediately
- Player is removed from all promotional and VIP programs
- Remaining account balance is made available for withdrawal
- Account cannot be reopened during the exclusion period

**Reinstatement (after temporary exclusion):** Minimum 24-hour cooling-off period; responsible gaming check-in; optional re-imposition of limits.

## 6.0 Reality Checks & Session Controls

The platform provides the following reality check mechanisms:

- **Activity History:** Full transaction and gaming history accessible through account settings
- **Betting Pattern Information:** Players have access to information regarding their historical betting patterns as part of the player analytics section
- **Win/Loss Information:** Detailed win and loss data is available to players through the player analytics section, enabling informed review of their gaming activity

## 7.0 Underage Gambling Prevention

The operator strictly prohibits gambling by persons under 18 years of age. Measures include:

- Mandatory date of birth entry at registration with age calculation verification
- Age verification through KYC document checks (government-issued ID)
- No account activation or deposit acceptance without age confirmation
- Immediate account closure and refund of deposits if underage play is identified
- Clear age restriction messaging on all marketing materials and website
- Partnership with age verification technology providers

## 8.0 Vulnerable Player Identification

The operator trains staff and deploys systems to identify potentially vulnerable players. Indicators include:

- Significant increases in deposit amounts or frequency
- Chasing losses (immediate re-deposits after large losses)

- Extended session durations (multiple hours without breaks)
- Requests to increase or remove limits shortly after setting them
- Expressions of distress, frustration, or gambling-related problems via customer support
- Multiple failed deposit attempts or use of multiple payment methods
- Cancellation of withdrawal requests (reversal behavior)

When vulnerability indicators are detected, the operator will: contact the player to offer support, provide information about responsible gaming tools, suggest a cooling-off period, and, where appropriate, impose limits or restrict the account.

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## Responsible Marketing Standards

All marketing and advertising activity must comply with:

- No targeting of minors or vulnerable persons
- No suggestion that gambling can solve financial problems
- No implication of guaranteed winnings or success
- Clear display of age restriction (18+) on all materials
- Responsible gaming messaging included in all promotional communications
- Self-excluded players excluded from all marketing
- Transparent terms for all bonuses and promotions
- No glamorization or trivialization of gambling

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## Support Resources & Referrals

The operator provides prominently displayed links and information for gambling support organizations:

- **GamCare** — [www.gamcare.org.uk](http://www.gamcare.org.uk)
- **Gamblers Anonymous** — [www.gamblersanonymous.org](http://www.gamblersanonymous.org)
- **BeGambleAware** — [www.begambleaware.org](http://www.begambleaware.org)
- **National Council on Problem Gambling** — [www.ncpgambling.org](http://www.ncpgambling.org)
- **Self-Exclusion Schemes** — Links to relevant national/international self-exclusion programs

Support information is accessible from every page of the website, the account settings area, and all customer support communications.

## 11.0 Staff Training

All customer-facing staff and management receive responsible gaming training covering:

- Understanding problem gambling and its impact
- Recognizing signs of gambling-related harm
- How to approach and interact with potentially vulnerable players
- Available player protection tools and how to assist players in using them
- Internal escalation procedures
- Legal and regulatory obligations

Training is provided at induction and refreshed annually. Records are maintained and available for CGA inspection.

## 12.0 Policy Review

This Responsible Gaming Policy is reviewed at least annually by the Compliance Officer and approved by the Board of Directors. Updates reflect changes in CGA requirements, industry standards, and feedback from players and staff. All revisions are documented and communicated to relevant personnel.