

CONFIDENTIAL

RESPONSIBLE GAMBLING POLICY

REVISION HISTORY

Version Number	Date	Summary of changes	Author
1.0	01/06/2025	New policy drafted	Edward Mackrill

Approved by: Gouloud Hammoud, Director	
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MISSION STATEMENT

Whilst the majority of our customers gamble with us for entertainment purposes, it is important that we are aware that for some gambling can cause serious harm. This harm can lead to extreme consequences for the individual and can also have a severe impact on their families, friends, communities and employers.

As an operator licensed by the Curaçao Gaming Authority (CGA), Luminct Limited B.V. (Luminct) has important legal and regulatory obligations to protect children and other vulnerable persons from being harmed or exploited by gambling. Where we do interact with customers, it is important that this is done sensitively and by trained employees.

We must take all reasonable steps to prevent anyone under the age of 18 from accessing our services.

We must take all reasonable steps to ensure that our marketing material is not sent to anyone under the age of 18 or to problem gamblers. Our marketing must not condone or encourage gambling behaviour that is socially irresponsible.

OVERVIEW

This policy is intended as a point of reference for all staff, in particular those who engage directly with customers.

This policy seeks to make staff aware of their responsibilities in relation to responsible gambling, specifically:

- How Luminct prevents minors from accessing gambling
- Luminct's approach to responsible marketing
- The various responsible gambling tools Luminct makes available to customers

IT IS ESSENTIAL THAT ALL STAFF READ AND APPLY THIS POLICY AT ALL TIMES

PROTECTION OF MINORS

Under Curaçao law, persons under the age of 18 are forbidden from accessing online gambling and betting services. Similar laws in other countries restrict gambling from persons at a different age, which is typically greater. Luminct forbids the use of its services by persons under the age of 18 regardless of geographical location and takes several measures to enforce this.

Registration form

The registration form requires all new customers to enter their date of birth – it is impossible to enter a date of birth that would make the customer under the age of 18. New customers also need to confirm that they are of at least 18 years of age.

18+ warning

We display the industry-standard warning sign on the homepage of our website that underage gambling is prohibited.

Terms and Conditions

The website's Terms and Conditions state that customers must be at least 18 years of age to open an account with us.

Parental control software

Our Responsible Gambling help pages provides details of parental control and web filtering software which gives parents complete visibility and control over their child's online activity.

Identification and age verification

We will conduct identity verification at various points in the customer's life cycle. Please see our Anti-Money Laundering policy for more details.

Underage account detection

Should a customer be identified as being underage at any point during their life cycle the account will be immediately closed, and details logged for record keeping. Notwithstanding any breaches of our terms, any winnings will be confiscated, and net deposits refunded to the customer.

Our system will automatically prevent customers from opening further accounts with similar details.

MARKETING

We must take all reasonable steps to ensure that our marketing material is not sent to anyone under the age of 18, problem gamblers or other vulnerable people.

We make use of all available data and technology to ensure that marketing communications are only sent to those of legal age to gamble.

During a Take a Break (cooling off) and Self-exclusion period our customers are automatically opted out from marketing in our systems.

Our marketing should provide clear and non-misleading information about our gambling products. It should be socially responsible and not encourage problem gambling. All marketing and advertising material includes a responsible gambling message and 18+ warning.

Our marketing should not:

- Claim that gambling is free of the risks of financial losses
- Promote behaviour that objectively leads to financial harm
- Provide false or unrealistic information about the probability of gambling winnings or returns
- Suggest that skill can influence the outcome of a game of pure chance
- Target or specifically appeal to Minors
- Must not portray, condone or encourage gambling behaviour that is socially irresponsible or could lead to financial, social or emotional harm.
- Suggest gambling is an important part of an individual's life and can be a resolution to personal, professional or educational problems
- Contain claims that gambling can lead to social success or enhancement of personal qualities, i.e. gambling can improve consumers' self-esteem;
- Promote gambling as an alternative to employment, or a solution to financial problems
- Imply that gambling is more important than family, friends or professional obligations
- Marketing must not condone or feature gambling in working environment, with the exception of licensed gambling premises
- Contain messages that gambling could lead to sexual success or enhanced attractiveness
- Exploit cultural beliefs regarding the role of gambling or luck
- Contain, pressuring or urgent messages such as "you have nothing to lose", "your next win is around the corner", or "hurry up and bet now"; or pressuring or urgent Call To Actions (CTA's) such as 'Play Now' or 'Bet Now' and messages should not be presented in any way that creates an unjustifiable sense of urgency

We are responsible for the actions of any third parties we contract with for marketing purposes and before entering into any contractual agreement we must ensure that the Third Party Due Diligence policy and procedure is followed and that responsible gambling standards have been adhered to.

We must ensure that any social media advertising (including influencers) is age-gated and steps have been taken to ensure it does not target vulnerable groups.

Terms and conditions of any reward or bonus must be fair, unambiguous and readily available to customers. A link to the full terms and conditions of the reward or bonus must be displayed no further than one click away.

RESPONSIBLE GAMBLING INFORMATION

The Responsible Gambling page can be reached from the footer of our websites and from the side menu. This page provides general information about how to gamble responsibly, information on the responsible gambling tools we make available to customers, links to help sites and a self-assessment tool to help one identify whether they have a problem with their gambling.

During our internal responsible gambling training, staff are familiarised with the content of the responsible gambling pages in order to readily refer customers to it or discuss the tools available where necessary.

RESPONSIBLE GAMBLING TOOLS

Luminct offers the following responsible gambling tools to all customers:

- Financial and Participation limits
- Reality Checks
- Take a break / Cooling-off periods
- Self-Exclusion
- Self-assessment tool

Customers can set each of these tools themselves on our website. Our Customer Experience team can also apply each of these tools manually on request of the customer.

Financial & Participation Limits

Customers can set a deposit, wager or loss limit on their account on a 24-hour, 7-day, or 30-day basis. This restricts the amount a customer can deposit, wager or lose in that defined period.

Once set, should a customer wish to increase or remove their limit, a 7-day cooling off period will be applied before any increase or removal comes into effect. At the end of the cooling off period, the customer must confirm that they wish to proceed with this increase or removal for the changes to take effect.

Should a customer wish to decrease any of their limits this change is effective immediately. When a request to decrease a limit is received, the system will take into account all activity that has already occurred during the chosen period. This means that if a customer has already exceeded the limit for the time period chosen the system will restrict activity until the new limit period has begun.

Reality Checks

Our reality check functionality allows customers to set a regular reminder about their time spent gambling. The customer has the option to reduce this period to as low as 5-minute intervals or increase it to a maximum of 60 minutes.

The reality check offered by Luminect is implemented at the 'customer account' level. This means that the reality check timer will commence once the customer logs into our website and continues regardless of which area of the website a customer visits. The reality check message will display once the selected interval is reached.

The reality check pop-up will display the time elapsed since the customer first logged into the site as well a summary of their activity during this period. It will give the customer the option to view their gameplay history, review their limits or to log out of their account completely. If the customer does not acknowledge the reality check message they will be automatically logged out of the website.

Take a Break / Cooling-off periods

For customers wishing to take a break from gambling, they have the option to close their account for a specified timeframe, those being:

- 1 day
- 1 week
- 1 month
- 3 months

Customers can also ask the Customer Experience team for assistance in setting a 'Take a Break', for any timeframe from 1 day up to 3 months, and this will be honoured and set.

After the customer has confirmed they want to take a break, they will not be able to log into their account for the period chosen, nor will they receive marketing material. Once the 'Take a Break' period has expired, the account will automatically be reactivated.

Self-Exclusion

For customers who are struggling to control their gambling, the self-exclusion option allows them to close their account for a period of between 1 year and 10 years. Alternatively they may wish to apply a 'lifetime' exclusion to their account.

Customers can self-exclude via our website or by contacting our Customer Experience team through email or live chat. Once the self-exclusion has been set they will not be able to log into their account

for the period chosen, nor will they receive marketing material. At the end of the self-exclusion period, the account will not be reopened automatically – it will remain self-excluded. The customer will need to make a positive request to re-open their account by contacting the Customer Experience team.

When a customer has entered into a self-exclusion agreement with Luminect, an email will be automatically sent to them confirming this along with details of organisations providing additional support and a reminder to self-exclude from other sites. Any self-exclusion set will be implemented across all Luminect domains.

Luminect have a number of internal controls to help them identify accounts linked by First Name, Last Name, DOB and payment methods. Once identified, any duplicate accounts will also be self-excluded.

Once a customer has entered into a self-exclusion agreement with Luminect any remaining balance will be refunded back to them, including any bonuses with a cash value.

Self-assessment tool

Customers can take a self-assessment test on our Responsible Gambling page. It consists of 8 statements curated to identify potentially harmful behaviour. After a customer has completed the questions, a result is displayed based on their answers with various suggestions on next steps for the customer.

A copy of the self-assessment tool is provided in **Appendix 1**.

External Support Organisations

Luminect is committed to supporting customers who may be experiencing gambling-related harm. In addition to the tools we provide, we strongly encourage customers to seek help from external organisations that specialise in gambling addiction support. These services offer free, confidential advice and support 24/7:

- Gambling Therapy - <https://www.gamblingtherapy.org/>
- Gamblers Anonymous International - <https://www.gamblersanonymous.org/>
- National Council on Problem Gambling (NCPG) - <https://www.ncpgambling.org/>
- YourLifeCounts.org - <https://www.yourlifecounts.org/>
- StopPredatoryGambling.org - <https://www.stoppredatorygambling.org/>
- GamBan - <https://www.gamban.com/>

These links are also available on our Responsible Gambling page.

MONITORING

We operate a series of behavioural based triggers and interact with customers in real time where we suspect they may be at risk of harm. These triggers look at a variety of customer actions including:

- Spend
- Betting patterns
- Time spent gambling
- Use of gambling management tools
- Cancelling of withdrawals
- Customer-led contact

These triggers are split into HIGH, MEDIUM and LOW risk. Accounts hitting a HIGH risk trigger requires a review of the alert and a direct interaction with the customer. Accounts hitting a MEDIUM or LOW trigger will receive automated communication educating them on their gameplay and the responsible gambling tools we offer.

Logging and Audit Readiness

All responsible gambling-related actions — including tool changes, customer interactions, trigger reviews, and self-exclusion events — are logged in our back-office system. These logs are securely stored and retained in accordance with our data retention policy.

Luminect ensures that all records are accessible and auditable at the request of the Curaçao Gaming Authority (CGA), and regular internal reviews are conducted to maintain compliance.

High Risk Review

The Customer experience team will be notified via internal communication channels as soon as a HIGH risk account is flagged for a review. A review of the account must be conducted within 1 hour. This review should focus on:

- Historical alerts
- Behaviour that triggered the alert
- Overall account activity
- Customer communications

The review is recorded in the customer account in the back office and any interaction required will be decided and justified within the member notes.

THE INTERACTION

Once we have identified that a customer may be at risk and in need of an interaction, acting quickly is important to stop the harmful behaviour getting worse.

Levels of interaction

Some of the interactions are automated others are customised.

Level 1 – Automated on-site messages or emails

Level 2 – Questionnaire pop-up

Level 3 – Customised email

Level 4 – Live chat/ phone call

Automated on-site messages or emails

When a customer hits a particular trigger based on their behaviour they will receive an on-site message or email highlighting this particular behaviour and will educate the customer further on their behaviour and our tools available

Questionnaire pop-up

When a customer hits a particular trigger a Questionnaire with four (4) YES or NO questions will appear for the customer to respond to prior to being allowed to continue.

If the customer replies with four NO's, no further review is required, if the customer however replies with one or more YES's this will trigger an alert for a review.

Customised email

When a customer hits a particular trigger based on their behaviour, we will send a customised email addressing the particular behaviour, provide overview of the tools we offer/ self-assessment tool / have tools enforced onto their account

Live chat/ phone call

In some cases, a human interaction will be needed. In the live chat /phone call we will:

- Discuss with the customer their behaviour that has attracted our attention and why we see it as a concern
- Ask them if they are comfortable with their current level of play
- Give information and also present options of tools for the customer to use
- If necessary, have tools enforced onto their account

STAFF TRAINING

All customer-facing staff will receive enhanced on-boarding training and yearly refresher training. This training provides an overview of Luminct's approach to responsible gambling, explains the tools we offer customers to enable them to manage their gambling and explains how to recognise and manage signs of gambling distress.

We also offer ad hoc training. This may be in the form of using a third-party provider to host and deliver the training or an e-Learning course which can be completed. Records of attendance are kept on file.

Compliance Oversight

The Key Compliance Officer is responsible for overseeing the effectiveness of responsible gambling procedures. This includes monthly reviews of RG activity logs, training records, and customer interactions to ensure that Luminect's practices remain aligned with regulatory expectations. Any concerns or deviations are escalated to senior management, and remedial actions are documented.

EMPLOYEE WELFARE

Luminect takes the safety of its staff very seriously and recognises that members of staff might develop a problem with their own gambling as they are working on a daily basis in an environment where gambling is being discussed. Should an employee raise a concern to their manager or to any member of Luminect, or should a manager identify a concern and intervene, the employee should be referred to a doctor, provided information about where to get assistance, and where necessary, be placed onto sick leave and not return until they receive a note from a medical or other advisor confirming that they can return to work safely.

APPENDIX 1 – Responsible Gambling Self-assessment tool



Test Your Gambling Profile

Start Test

1/8

Sometimes I gamble longer than I intend to

☐ Never ☐ Sometimes ☐ Most of the time ☐ Always

Next Question

2/8

It is easy to lose track of time when gambling

☐ Never ☐ Sometimes ☐ Most of the time ☐ Always

Next Question

3/8

Sometimes I spend more money gambling than I intend to

☐ Never ☐ Sometimes ☐ Most of the time ☐ Always

Next Question

4/8

I try win back money that I have lost gambling

☐ Never ☐ Sometimes ☐ Most of the time ☐ Always

Next Question

5/8

I have spent money gambling that should have been spent on something else

☐ Never ☐ Sometimes ☐ Most of the time ☐ Always

[Next Question](#)

6/8

If I think about how much I've lost gambling I feel anxious/upset/stressed

☐ Never ☐ Sometimes ☐ Most of the time ☐ Always

[Next Question](#)

7/8

I get restless or aggravated if I haven't been able to gamble

☐ Never ☐ Sometimes ☐ Most of the time ☐ Always

[Next Question](#)

8/8

People close to me think I gamble too much

☐ Never ☐ Sometimes ☐ Most of the time ☐ Always

[Next Question](#)



Taking our self-assessment test is a great step in the right direction!

Based on your answers it sounds as if gambling is no longer fun for you.

If you feel that you are struggling to restrict the time you spend online, a [Reality Check](#) can be added. Set the timer, and you will receive a notification. Don't worry, this doesn't effect any game you are currently playing.

We offer 3 tools which can help you manage your spend on site; [Deposit Limits](#), [Loss Limits](#) & [Wager Limits](#). Review your finances (incoming and outgoings), and decide what you feel is a sensible and affordable amount, and then choose the limit best suited to your needs.

Alternatively, you may think that the above tools just aren't what you are looking for and you require a break away. You can action this by selecting to [Take-a-Break](#) tool or even [Self-Exclude](#). It is important to know your limits.

If you are unsure what tool is best for you, then please do not hesitate to contact us! Our friendly and knowledgeable staff are available to discuss your options.

Start Over