

Player Safety Policy and Procedures

Version 2.0 - FarUp Entertainment

Our commitment to responsible gaming is rooted in prevention and support. We aim to minimize the potential harms associated with gambling by providing players with tools to manage their play and access to resources for responsible gaming education and support. We believe in fostering a safe and transparent gaming environment.

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Introduction

For most people, gambling is related to fun, pleasure and relaxation. However, gambling addiction can appear at any stage; the gambler doesn't necessarily have to take huge risks with big amounts of money to get addicted. Considering the destructive consequences of the gambling addiction, the term "Responsible Gambling" started getting more attention by psychological researchers. This concept refers to playing games at Casinos and other places by taking risk to the safe extent.

Gambling is really not an innovation of the modern era, but its history could also be dated back to the ancient civilizations (Bellringer, 1999). The Middle East, India, and ancient Greece report traces of gambling as old as 4000 years (Ladouceur, 2001). The negative effects of gambling like

social tragedies and large debts have also been associated in these nations.

According to a famous psychologist, risk taking is part of the nature of humans and gambling provides one of the manifestations to this nature (Bellringer, 1999). The addiction for taking risks has forced people around the globe to take interest in gambling games and plots.

Overall, the risks of negative effects on social and economic wellbeing of the country reigned over many countries including USA, Canada, Denmark, and Norway during the previous decade. Some of these countries have legalized gambling by defining rules and regulations based on the responsible attitude and self-control. Communication with the players is very important in this regard. The casinos and gaming clubs

should monitor all gambling activities and take measures to mitigate the harmful aspects of this game on both, social and economic sides.

Social Responsibility

Corporate Social Responsibility (CSR) in the gambling industry arises within the concept of responsible gambling, in which the corporations give problem gamblers a greater sense of self-control over gaming. Elements of CSR in the gambling setup include customers, employees, shareholders, community, environment, and government (Luo, 2017). By promoting CSR practices in the gambling industry, it is possible to eliminate the harmful effects related to social and financial considerations (Luo, 2017).

The gambling game should be based on personal choice by respecting the rules of the game in a positive spirit. Participating individuals must know their limits and shouldn't borrow money from others for their leisure. An element of CSR in the gambling industry which shows of great importance, if not the most important, is that gambling should be considered as a way of entertainment instead of earning money. Therefore the limits of the game should be respected and the player must pull out if he exceeds these limits (Tetrelová, n.d.).

The gambling industry has shown a rapid expansion in the past century and different researchers, social scientists and consumers took initiative to better understand the industry and effects of gambling and the problems that arise with it. Over the years, it has become increasingly noticeable that problem gambling is a growing threat to public health. Stakeholders are therefore responsible to cooperate and identify potential harms in order to reduce or remove

them completely, while also highlighting the possible benefits of gambling (Blaszczynski, Ladouceur & Shaffer, 2004). Even though the gambling industry has existed for a long time, it is only recent that responsible gambling practices are being developed and implemented.

CSR Corporate Social Responsibility in businesses

Studies have shown that companies that fully integrate CSR into their operations can expect good financial returns on their investments. Companies integrating CSR have been shown to increase sales and prices as well as reduce employee turnover.

One of the reasons companies increase profits when incorporating CSR into their business model is because customers pay attention to the way companies react to social and political issues, and will often boycott companies with negative values. Companies using CSR promote positive values, which ultimately increases customer traffic and company profit.

What are the benefits of CSR for companies?

While it is a reality that businesses aim to maximize profits, it is still essential that they maintain a good relationship with the social environment they operate in. Companies that can demonstrate reliance on society and invest in their social responsibilities tend to have a greater chance of success. Some benefits of CSR for companies include the following:

It can improve your company's profit margins. Socially responsible companies demonstrate their ethical practices in how they conduct business. Customers are highly aware of local, national and global issues. These issues influence their buying decisions – they will buy more from companies that show concern and take positive actions over issues that resonate with customers. It may boost your company's public image. Companies understand the importance of maintaining a positive reputation. Delivering high-quality products and services at a good value, as well as excellent customer service, after-sales support, and involvement in civic causes all demonstrate that the company cares about its customers and the environment as a whole. Companies with good CSR policies tend to get more as well as better media coverage, which advertises the company and improves company image.

It can improve the attractiveness of your business to investors. Potential investors use a company's social responsibility as part of the criteria for deciding whether or not to invest in the company. CSR is also crucial for improving the company's stock prices, which is essential for attracting investors.

1. Player Onboarding

1.1 Age verification

Players are required to confirm they meet the legal gambling age (18+, or higher as required by their jurisdiction) during registration. To ensure compliance, the system both validates the entered date of birth against the minimum age and requires players to actively acknowledge their age via a dedicated checkbox (the player has to actively confirm that they are 18+ by ticking a box “I am over 18” in the registration process).

Furthermore, before a first deposit will be accepted, the player has to confirm details about their payment method (note that payment methods can vary depending on the country the player resides and is registered from). Certain payment providers are automatically blocking payments if the player is below 18 years of age and therefore will not allow the player to make a successful transaction.

In addition to the above, a valid government issued ID will be requested from the player if:

- concerns that the player might be a minor still remain even after the above checks.
- they have a first withdrawal.
- the breach of a threshold specified in the AML and Know Your Customer policy.

1.2 Player onboarding journey

Upon successful login, a session timer will display the duration of the player's current session. The session timer is visible at all times and cannot be closed or clicked away. On mobile therefore, the session timer widget is toggleable, so the player can move it due to the more restricted interface on mobile compared to desktop.

Before a player is able to deposit for the first time, they have the option to set up account limits to their liking. The limit tool is available to the player in the “my account” section and in the responsible gaming page where the player can set and adjust their limit freely and at all times.

The player also has access to their bet history where they can review how many bets were placed and how many bets have been won. Additionally, the player also has access to their transaction history where deposits and withdrawals are displayed.

A Responsible Gaming page is available to the player at all times, in which the player can find helpful information and tips around gambling, available tools and their functionality, a self-assessment, help lines and blocking software recommendations and information about protecting minors.

2.Limits

2.1 Types of Limits offered and accessible for the Player

There are different Types of Limits players, who express the desire of limiting the amount of money or money's worth they deposit or play, can choose to set through customer services and/or set themselves in the Play Safe Section. To mitigate potential risks and ensure responsible gaming, we may implement proactive account limits based on risk assessments and/or affordability checks.

2.1.1 Deposit Limit

This option lets the players put a limit on the amount of deposit they can make Daily, Weekly and Monthly. By setting a deposit limit, the player can avoid depositing more than they can afford or wish to spend on gambling.

The deposit limit works by summing up all the deposits the player has made within a rolling day, week and/ or month and allows the player to only deposit the remaining amount based on the deposit limit set for each duration. The deposit limits are set in player currency and available through customer services.

Daily Limit

The daily limit sums up all deposits made in the last 24 hours and allows the player to only deposit the remaining amount based on the daily limit set by the player.

For example:

The player makes a deposit of €40 at 11:00 AM on a Wednesday

After a while at 2:00 PM that day the player deposits another €40

Later on the same day the player sets their daily deposit limit to €100

The system will only allow the player to make a deposit of €20 until Thursday 11:00 AM

Post 11:00 AM Thursday, until 2:00 PM Thursday, the player will be allowed to deposit €60

Post 2:00 PM Thursday the player will be allowed to deposit up to €100

Weekly Limit

The weekly limit sums up all deposits made in the last 7 days (rolling days - 168 hours) and allows the player to only deposit the remaining amount based on the weekly limit set by the player.

For example:

The player makes a deposit of €40 at 11:00 AM on a Wednesday

The next day on Thursday at 2:00 PM the player deposits another €40

Later on the same day the player sets a weekly deposit limit to €300

Now the player will only be allowed to make deposits of €220 until the next Wednesday 11:00 AM

Post 11:00 AM the next Wednesday, after 11:00 AM, the player will be allowed to deposit up to €260

Post 2:00 PM the next Thursday player will be allowed to deposit up to €300

Monthly Limit

The monthly limit sums up all the deposits made in the last 30 days (rolling days - 720 hours) and allows the player to only deposit the remaining amount based on the monthly limit set by the player.

For example:

The player makes a deposit of €40 at 11:00 AM on the 5th of March

After a few days on the 10th of March at 2:00 PM the player deposits another €40

Right after that on the same day, the player sets a monthly deposit limit to €500

Now the player can only make further deposits of €420 until 5th of April 11:00 AM

Post 11:00 AM 5th of April, until 2:00 PM 10th of April, the player will be allowed to deposit only €460

Post 2:00 PM 10th of April, the player will be allowed to deposit up to €500

2.1.2 Wagering Limit

This option lets the players put a limit on the amount they want to wager/bet on a Daily, Weekly and Monthly basis. The wager limit works by summing up all the bets placed by the player from the start of the day 00:00:00 (system/server time zone) until end of the day 23:59:59 (system/server time zone) and the same way checks for weekly and monthly limits.

Note:

System/Server time zone is CET.

The wager limits are set in player currency and are available through customer services.

Daily Limit

The daily wager limit considers all bets placed by the player from 00:00:00 until 23:59:59 that day. Based on the daily limit and the total bets placed by the player, the system will allow or block the player from game play.

For example

The player has placed a total bet of €40 in a day

Later that same day the player sets a daily wager limit to €100

The system will now only allow the player to place an additional total bet of €60 until 23:59:59 that day

On the next day 00:00:00 until 23:59:59 the player will be allowed to place a total bet of €100.

Weekly Limit

The weekly wager limit considers all bets placed by the player in the current day plus the last 6

days. Based on the total amount of bets placed in the current day (from 00:00:00 until 23:59:59 that day) plus the last 6 days, the system will allow or block the player from game play if the bet amount exceeds the set weekly wager limit.

For example:

The player has placed a total bet of €110 in the last 6 days

On Wednesday the 7th day, player places few bets amounting €40 and then sets a weekly wager limit to €300

The player will now be allowed to only place an additional bet of €150 until Wednesday 23:59:59

Another example:

The player opens an account and sets the weekly wager limit to €300. The weekly limit would apply as follows

Day# / Bet amount / Remaining Bet amount allowed as per weekly limit

Day1 / €50 / €250

Day2 / €50 / €200

Day3 / €50 / €150

Day4 / €30 / €120

Day5 / €20 / €100

Day6 / €20 / €80

Day7 / €30 / €50

Day8 / €50 / €50

Day9 / €30 / €70

Day10 / €20 / €100

Monthly Limit

The monthly wager limit considers all bets placed by the player in the current day plus the last 29 days. Based on the total amount of bets placed in the current day (from 00:00:00 until 23:59:59 that day) plus the last 29 days, the system will allow or block the player from game play if the bet amount exceeds the set monthly wager limit.

For example

The player has placed a total bet of €500 in the last 29 days

On the current day, player places bets amounting €100 and then sets a monthly wager limit to €1000

The player will now only be allowed to place an additional total bet of €400 until 23:59:59 of the 30th day

2.1.3 Loss Limit

This option lets the players put a limit on the amount they can lose on a daily, weekly and/or monthly basis. By setting a loss limit, the player can avoid losing more than they can afford or wish to spend on gambling.

The loss limit works by summing up all the bets placed minus all wins from the start of the day 00:00:00 (system/server time zone) until end of the day 23:59:59 (system/server time zone) and the same way checks for weekly and monthly limits.

Note:

System/Server time zone is CET

The loss limits are set in player's currency and are available through customer services.

Daily Limit

The daily loss limit considers all bets placed by the player minus all wins from 00:00:00 until 23:59:59 that day. Based on the daily limit and the total net loss, the system will allow or block the player from game play.

For example

The player has a total net loss of €40 in a day

Later that same day the player sets a daily loss limit of €50

The system will now allow the player to only place an additional total bet of €10 until 23:59:59

Weekly Limit

The weekly loss limit considers all bets placed by the player minus all wins in the current day (from 00:00:00 until 23:59:59 that day) plus the net loss of the last 6 days. Based on the weekly limit and the total net loss in the week, the system will allow or block the player from game play.

For example

The player has a total net loss of €110 in the last 6 days

On the 7th day the player sets a weekly loss limit of €200

The player will now be allowed to only place additional bets of €90 until 23:59:59

Another example

The player opens an account and sets a weekly loss limit of €200. The weekly limit would apply as follows

Day# / Net loss amount / Remaining Bet amount allowed as per weekly limit

Day1 / €50 / €150

Day2 / €50 / €100

Day3 / €50 / €50

Day4 / €-100 / €150

Day5 / €30 / €120

Day6 / €20 / €100

Day7 / €-50 / €150

Day8 / €50 / €100

Day9 / €10 / €110

Day10 / €20 / €220

Monthly Limit

The monthly loss limit considers all bets placed by the player in the current day (from 00:00:00 until 23:59:59 that day) plus the net loss of the last 29 days. Based on the total net loss in the current day (from 00:00:00 until 23:59:59 that day) plus the net loss of the last 29 days, the system will allow or block the player from game play if the bet amount exceeds the set monthly loss limit.

For example

The player has a total net loss of €500 in the last 29 days

On the current day, the player sets a monthly loss limit to €1000

The player will now be allowed to only place additional total bets of €500 until 23:59:59 on the 30th day

2.1.4 Net Deposit Limit

This option lets the players put a limit on the amount of net-deposits they can make daily, weekly and/or monthly. This limit allows the player to re-deposit any successful withdrawals they had during the period. By setting a net-deposit limit the player can avoid depositing and losing more than they can afford or wish to spend on gambling.

The net-deposit limit works by summing up all successful deposits the player has made during a certain period (in calendar days). In addition the limit will allow the player to deposit the amount equal to all withdrawals successfully made during the period.

Note:

System/Server time zone is CET

The net deposit limits are set in player's currency and are available through customer services and in the Play Safe section.

Daily Limit

The daily net deposit limit considers all successful deposits and withdrawals made during a calendar day (between 00:00:00 and 23:59:59).

Based on the daily limit and the total net-deposits, the system will allow or block the player from further deposits.

For example:

The player makes a deposit of €50

Later on the day, the player sets a net deposit limit of €100

The limit will allow the player to only deposit an additional €50 until the end of the day 23:59:59

Another example:

The player makes a deposit of €50

Later on the day, the player sets a net deposit limit of €100

The player then makes a successful withdrawal of €50

The limit will allow the player to deposit an additional €100 until the end of the day 23:59:59

Weekly Limit

The weekly net deposit limit considers all successful deposits and withdrawals made in a calendar week (between Monday 00:00:00 and Sunday 23:59:59).

For example:

The player deposits a total of €50 on Monday

On Tuesday the player sets a weekly net deposit limit of €100

The limit will allow the player to only deposit an additional €50 until the end of the week (Sunday 23:59:59)

Another example:

The player opens an account and sets a weekly net deposit limit of €200

On Monday the player makes a successful deposit of €50

On Tuesday the player makes a successful withdrawal of €100

The limit will allow the player to deposit an additional €250 until the end of the week (Sunday 23:59:59)

Monthly Limit

The monthly net deposit limit considers all successful deposits and withdrawals made in a calendar month (between the 1st of the month 00:00:00 and the last of the month 23:59:59).

For example:

The player deposits a total of €50 on the 13th day of the month

On the 20th of the month the player sets a monthly net deposit limit of €100

The limit will allow the player to only deposit an additional €50 until the end of the month (last day of the month 23:59:59)

Another example:

The player opens an account and sets the monthly net deposit limit of €200

On the 5th of the month the player makes a successful deposit of €50

On the 13th of the month the player makes a successful withdrawal of €100

The limit will allow the player to deposit an additional €250 until the end of the month (last day of the month 23:59:59)

2.2 Decreasing Limits

In the event where the player chooses to decrease the set limit (making the limit more stringent) the new limit will be in place instantly.

2.3 Increasing Limits or Removing Limits

Any limit implemented shall only be removed upon request of the player and shall only be made less stringent upon request of the player.

If a player informs us to increase their limit, making the limit less stringent, it takes 24 hours of the time of request until the new limit is active.

The player can choose to increase the limit in self-service in the Play Safe Section in their account or through customer services. The option to completely remove a limit is only available through customer services.

2.4 Reality Check

Upon logging into their gaming account, players will see a persistent session timer displaying the elapsed time of their current session.

Moreover, players can request a Reality Check through customer support. This feature will trigger a notification at their chosen interval (between 5 and 60 minutes), interrupting gameplay to display the session's duration and their cumulative wins and losses. Players must acknowledge the notification by clicking a confirmation button before resuming gameplay. They also have the option to exit the game at this point.

Reality Check intervals can be configured in increments from 5 to 60 minutes.

In addition to the player-activated reality check, a great number of game providers interrupt players' game play automatically during the session with a reality check, confirming the time spent on the game and any winnings and losses during that period.

3. Timeouts and Self-Exclusions

A procedure whereby a player may exclude themselves from playing for a definite or indefinite period of time is available to all players.

During the chosen exclusion and time period the player will not be able to access their account. A player on a definite or indefinite exclusion is automatically excluded from any marketing material and will not receive any marketing send out.

Once a player has requested a definite closure, indefinite closure or permanent closure, of an account we shall ask whether or not this is to be interpreted as a self-exclusion request. The player can always increase the length of their initially chosen break via customer services.

There may be different reasons why a player chooses to close their account. In any case we respect the decision the player made, however we must educate all players about the different closure options available and make the difference between them clear and easily understandable, so that the player can make an informed choice of which closure option suits

them best and if they feel they have developed problematic gambling behaviour, that we recommend them to self-exclude. In any case, the support team (customer services and/ or loyalty managers) are always ready to assist players with their account closure request.

3.1 Time Out (Cooling Off)

A Time Out (Cooling Off) is a definite closure for a short period of time a player can decide to take at any point. The periods offered are 24 hours, 7 days, 30 days (1 month) or 90 days (3 months). A player may apply a Time Out through the Play Safe section within their player account or through customer services.

During the chosen period, the player will not be able to access their account and not receive any marketing material from us. If a player wants to extend their break, they can contact us through customer services. Note that the Time Out applies to the players account entirely and considers a break for all verticals (sports betting and casino) and cannot be set for only one vertical.

The account will automatically reopen after the chosen Time Out period.

3.3 Self-Exclusion

A Self-Exclusion is highly recommended to players who develop dependency towards gambling or where gambling is having a negative impact.

A definite self-exclusion can be any time frame between 1 year and 10 years. The account will not reopen automatically after the chosen period of Self-Exclusion has passed. In the case that the player does wish to completely stop gambling also a permanent self-exclusion is available.

Throughout the period of closure, players who have opted for a definite or indefinite self-exclusion period cannot gain access to their gambling account. Players are advised, when self-excluding, to also close any accounts they may have with other operators during the time. Self-Excluded players are automatically excluded from any marketing send-out.

A player can request a self-exclusion for their gambling account through customer services and/or the Play Safe section within their gaming account. Note that the Self-Exclusion applies to the players account entirely and considers a break for all verticals (sports betting and casino) and cannot be set for only one vertical. A Self-Exclusion is applied to any brand under the same license.

3.3.1 Definite Self-Exclusion

A definite/defined self-exclusion can be 1 year, 3 years, 5 years or 10 years. Once a definite self-exclusion is confirmed and in place, the account shall not be reopened earlier than the chosen time period. The account will not reopen automatically after the chosen period has elapsed but requires written confirmation from the player that they wish to continue playing and reinstate their gaming account.

3.3.2 Indefinite Self-Exclusion

An indefinite self-exclusion is not bound to a specific end date and will, however, last for at least 1 year. After 1 year has passed the account will not reopen automatically but the player has to reach out to customer services with a written confirmation of wishing to reinstate their gaming account in order to get the account reopened. Once the account is reopened, a cooling off period of 24 hours will apply before the account can be accessed again.

If the player wishes to permanently restrict access from their gaming account, a permanent Self-Exclusion is available to players, where the reopening of the account is not possible.

3.3 Service Closure

A service closure is an indefinite exclusion requested from the player for a reason that is not in relation with a responsible gaming reason or concern. The player can request to have their account closed for an indefinite period of time and can also be reopened without a minimum closure period.

The account can only be reopened, if the player requests the reopening of their account through customer services with a written confirmation that they wish to continue playing. Once the player has requested the reopening of their account we will ensure that the player is ready to come back and if the player is comfortable with their decision to come back and start gambling again. Only then the player will be able to access their account again.

3.4 Account Reopening

Once a player has requested their account to be closed they might request to have their account reopened/ reinstated.

An indefinitely excluded account can only be reopened upon request of the player through customer services. If a player reaches out to us and requests their account to be reinstated we will perform checks in regards to responsible gambling and make sure the player has considered their decision to come back and start gambling again. In case that concerns in regards to responsible gambling were found, we, as the casino operator, will discuss reasonable limits with the player prior to the reopening of the gambling account or may refuse the reopening of the account entirely.

A definite/defined exclusion can not be reopened before the selected time period has elapsed. In case concerns in regards to responsible gambling were found, we, as the casino operator, may refuse the reopening of the account and potentially extend the exclusion period.

4. Helplinks

<https://www.ncpgambling.org/5475-2/> free info about further helplines

<https://www.gamblingtherapy.org/> free online support for problem gamblers

<https://gamblersanonymous.org/> free support in terms of meetings

<https://www.gamblock.com/> GamBlock software - filter software

www.netnanny.com Netnanny - blocking software

www.cybersitter.com CyberSitter - blocking software

<https://gamblersanonymous.org/20-questions/> Self-Assessment test

<https://www.gambleaware.org/> free online support around problem gambling

5. Self-Assessment

All players are offered a self-assessment test at all time through the RG page onsite. FarUp Entertainment carries a responsible gaming page with information about RG tools offered, a self-assessment test, responsible gaming tips, help links and guidelines for problem gambling and protection of minors.

The self-assessment test displayed is the PGSI with scoring instructions:

Think about the last 12 months...

- Have you bet more than you could really afford to lose?
- Have you needed to gamble with larger amounts of money to get the same feeling of excitement?
- When you gambled, did you go back another day to try to win back the money you lost?
- Have you borrowed money or sold anything to get money to gamble?
- Have you felt that you might have a problem with gambling?
- Has gambling caused you any health problems, including stress or anxiety?
- Have people criticized your betting or told you that you had a gambling problem, regardless of whether or not you thought it was true?
- Has your gambling caused any financial problems for you or your household?
- Have you felt guilty about the way you gamble or what happens when you gamble?

Problem Gambling Severity Index (PGSI) Scoring instructions:

Each item is assessed on a four-point scale ranging from: never, sometimes, most of the time, almost always. Responses to each item are given the following scores:

never = 0

sometimes = 1

most of the time = 2

almost always = 3

When scores to each item are summed, a total score ranging from 0 to 27 is possible. Scores are grouped into the following categories:

0 = Gamblers who gamble with no negative consequences.

1-2 = Gamblers who experience a low level of problems with few or no identified negative consequences.

3-7 = Gamblers who experience a moderate level of problems leading to some negative consequences.

8 or more = Gambling with negative consequences and a possible loss of control.

An additional self-assessment test (DSM-IV):

The DSM-IV screening instrument is based on criteria from the fourth edition of the Diagnostic and Statistical Manual of the American Psychiatric Association (DSM-IV). The DSM-IV criteria form a tool created for diagnosis by clinicians of pathological gambling, and were not intended for use as a screening instrument among the general population in its original format. An adapted version of the DSM-IV to use in a survey setting was developed for the British Gambling Prevalence Survey (BGPS) series and was subject to a rigorous development and testing process, including cognitive testing and piloting. Each DSM-IV item is assessed on a four-point scale, ranging from 'never' to 'very often'. Responses to each item can either be dichotomised to show whether a person meets the criteria or not, or allocated a score and a total score is produced.

The screen

Respondents are asked whether they:

- 1 Are preoccupied with gambling (e.g., preoccupied with reliving past gambling experiences, handicapping or planning the next venture, or thinking of ways to get money with which to gamble)
- 2 Need to gamble with increasing amounts of money in order to achieve the desired excitement
- 3 Have repeated unsuccessful efforts to control, cut back, or stop gambling
- 4 Are restless or irritable when attempting to cut down or stop gambling
- 5 Gamble as a way of escaping from problems or of relieving a dysphoric mood (e.g., feelings of helplessness, guilt, anxiety, depression.)
- 6 After losing money gambling, often return another day in order to get even ("chasing" one's losses)
- 7 Lie to family members, therapist, or others to conceal the extent of involvement with gambling
- 8 Have committed illegal acts, such as forgery, fraud, theft, or embezzlement, in order to finance gambling
- 9 Have jeopardized or lost a significant relationship, job, or educational or career opportunity because of gambling
- 10 Rely on others to provide money to relieve a desperate financial situation caused by gambling

Scoring instructions

Each DSM-IV item is assessed on a four-point scale, ranging from 'never' to 'very often.' This is with the exception of 'chasing losses' which is rated on a scale ranging between 'never' and 'every time I lost'. Responses to each item are dichotomised (that is, given a score of 0 or 1) to show whether a person meets the criteria or not.

A total score between 0 and 10 is possible.

A threshold of meeting at least three of the DSM-IV criteria is used to define problem gambling. This cut-off point has been found to give good discrimination between criterion groups and has provided the closest match to prevalence estimated by other screening instruments.

The DSM-IV does not have recognised thresholds for low risk and moderate risk gambling.

6.Account Checks

Should a player show any signs of Problematic Gambling their gaming account will be assessed by the responsible gaming and risk team and a responsible gaming interaction will take place. In high risk accounts proactive measures may also be taken by the responsible gaming and risk team with assistance of the responsible gaming officer (e.g. deposit or account restriction).

Signs of Problem Gambling

Behaviours associated with at-risk gambling:

- Frequency of customer service contacts (especially increase bonus requests or agitation)
- Deposit frequency
- Use of multiple payment methods
- Reversing withdrawals
- Long gaming sessions (without breaks)
- Frequent changes of responsible gaming tools
- Players under the age of 25 spending substantial amounts
- Unrealistic spending patterns not in line with the player's demographics
- Multiple accounts per user (trying to bypass limits or exclusions)

Problem gambling signs in account activity:

- Chasing Losses: significant increase of deposit amount; velocity deposits; odd deposit amount; significant increase of bet amount
- Chasing Wins: significant increase of deposit amount after a significant win, velocity deposits; significant increase of bet amount
- Failed deposits due to insufficient funds (no funds in the bank account)
- Cancelling multiple withdrawals: multiple withdrawals cancelled during one session
- Usage of multiple payment methods in one session: multiple payment methods are used in one session
- 3rd party deposits: deposits made through a payment method that belongs to someone else but the player
- Sessions in unsocial hours: unsocial hours - 2AM-6AM during weekdays (player time)
- Daily sessions: the player logs in and plays on a daily basis
- Sessions that last longer than 5 hours: the player stays logged in for more than 5 hours at a time
- Multiple sessions per day: the player logs in multiple times in one day
- Increase of activity: deposits, stakes, time increase in one session and/or have significantly increased in lifetime of the account
- History of exclusions: the player has had minimum 1 self-exclusion before or minimum 3 timeouts before; frequent timeouts
- History of changing/revoking limits: the player frequently changes/ revokes limits

- Failed deposits due to spend limit reached: the player has multiple failed deposits due to reaching their deposit limit
- Playing with loans: the player is taking loans/ payday loans/ private loans in order to fund their gambling
- Playing with benefits: the player is funding their gambling from benefits (child benefits, unemployment benefits, etc.)
- Playing with credit card: the player uses credit card in order to deposit
- Spending more than disposable income: the player is depositing/ spending more than the verified income
- Chasing bonuses: the player frequently contacts customer support for additional bonuses
- Multiple accounts: the player creates multiple accounts
- Playing with multiple operators: the player is playing with more than 1 operator simultaneously

Of course that does not mean that one of them alone is a sign of problem gambling. It depends on the extent and number of them together.

Rule of thumb:

0-3 signs: Low risk player

4-7 sign: Medium risk player

8+ signs: At risk player

Additional parameters that have to be taken into consideration:

- At risk due to age: players younger than 25; players older than 65
- Previous/ current insolvency (bankruptcy)
- Physical/ psychological health concern
- Gambling Addiction

6.1 Translating Signs of Problem Gambling in account

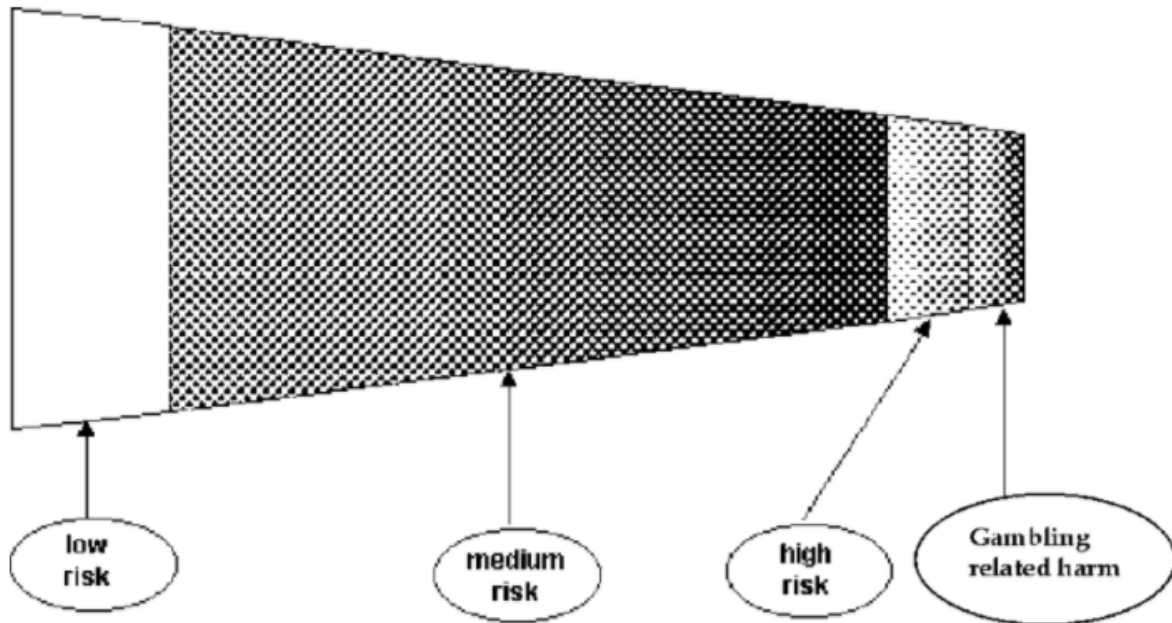
When checking an account we, the operator, have to get an overview of the player's activity by checking all available info thoroughly and note it down in the account. It is important to also note the extent of the concerns and leave a clear note in the account for future checks and audit reasons.

Additionally, frontline staff (customer service, loyalty managers) will flag an account to the responsible gaming and risk team for extensive review if:

- they notice an increase in contact, bonus requests and/ or agitation from a player
- a player makes concerning comments that gambling may affect them negatively
- they notice a general activity increase such as deposits, losses, bet sizes or time spent

6.2 Risk Scoring

The fundamental goal of responsible gambling is about reducing the rate of the development of new cases of harm or disorder that is gambling related.



Levels of Risk Exposure & Gambling-Related Harm.

Figure 1 above, presented by Blaszczynski et al. (2004, p. 310), represents four groups with varying risk exposure towards harmful gambling. Even though most individuals tend to gamble responsibly (shown by the “low risk” and “medium risk” 32 sectors), some do eventually develop a harmful gambling behavior and ought to be the focus of a responsible gambling strategy, as the author suggests. The “low risk” sector represents individuals who do not gamble and have almost no risk of developing gambling problems, whereas the “medium risk” and “high risk” segments contain players who gamble frequently and occasionally play more than initially planned.

Our scoring system will include 5 different risks from Low to High:
LOW LOW-MEDIUM MEDIUM MEDIUM-HIGH HIGH

When checking the account activity of a player we make sure to note down the concerns found as per this matrix:

- Money Related Chasing Losses/ Chasing Wins
- Failed deposits due to insufficient funds
- Cancelling withdrawals
- Multiple payment methods

- High Losses
- 3rd party deposits
- Time Related Unsocial hours (Sun-Friday 2am-6am player time)
- Daily sessions
- Sessions last longer than 3h
- Multiple sessions per day
- Increase money spend
- Increase time spend
- Overall activity increase
- Play Safe Tools History of self-exclusion
- History of timeouts
- History of Changing Limits
- History of revoking limits
- failed deposits due to spend limit reached
- Finance Related Playing with credit card
- Playing with loan, benefits or pension
- Previous or current insolvency/ bankruptcy
- Spending more than salary
- Concerns seen in KYC documents
- Player Related Age - young/old player
- Bonus chasing
- Contact from relatives
- Physical health concern
- Psychological health concern
- Gambling addiction
- Playing with multiple operators
- Positive Activity positive reply
- decrease in activity
- stable activity
- no activity

Of course that does not mean that one of these points alone means a player is a Problem Gambler. It depends on the extent and number of them together.

Rule of thumb:

0-1 signs: Low risk player

2-3 signs: Low-Medium risk player

4-5 signs: Medium risk player

6-7 signs: Medium-High risk player

8+ signs: High risk player

Also keeping in mind that facts like gambling addiction, usage of (payday) loans, psychological illness and/or bankruptcy are high risks in itself.

6.3 Proactive Actions

While we shall refrain from putting any proactive action on an account, in some cases and certain scenarios we will have to pro-actively interrupt a player's game play in order to ensure a safe gambling environment.

When to put Proactive Actions in place?

Should an account be labelled as High Risk due to our findings we want to consider temporarily interrupting the player's game play until our concerns are addressed or we have to end the business relationship with the player.

Possible reasons (but not limited to):

- Using (payday) loan(s) to fund gambling
- Current Bankruptcy
- Spending more than verified salary
- Financial concerns seen in KYC documents
- Concerns raised in chat/email
- Psychological health concern (G6)
- Gambling addiction (G7)

In addition to the proactive implementation of responsible gaming limits and self-exclusion, further account restrictions are available, which may include:

6.3.1 Game Block

The Game Block can stop a player from accessing and playing any games. Should we have a concern in regards to responsible gaming about a player but are in the middle of verification, communication, etc. with the player we do not want to refuse them access to their account but make sure that the player cannot continue game play and wager active funds during this time. A Game Block is very suitable in this situation.

6.3.2 Deposit Block

A deposit block will disable the option to make any further deposits. Should there be a concern that the player is playing on a financial level that is not affordable, we might want to consider blocking the account from making further deposits.

6.3.3 Account Block

The Account Block can stop a player from accessing their account completely. Should we have an RG concern about the player's financial situation, mental state or similar (high risk) we might want to consider to block their account to make sure the player cannot access the account and their funds in the account.

7. Communication

Problem Gambling is a very sensitive topic. When in touch with a player about responsible gaming and the risks of gambling, we have to keep in mind that the player could get offended by asking some questions about their gambling behaviour. Responsible gambling messages are used as a tool to enable informed choice and encourage responsible gambling behaviour. Gamblers have different levels of risk of developing gambling problems and require various harm minimization tools and resources.

Studies about Responsible Gaming communication showed:

Effective interventions are important to assist gamblers at various levels of risk to acquire and apply the requisite skills and knowledge necessary to control their gambling to affordable levels. Encouraging gamblers to seek help before their problems become severe would minimize harm, as well as reduce the burden on emergency and treatment services. However, individuals who engage in risky gambling but are not experiencing serious problems may lack motivation to seek help proactively and appear to be relatively hard to reach.

7.1 Soft Interaction

Soft interaction with a player in regards to responsible gaming is to be considered if the signs of problem gambling are low to medium. Soft interaction shall be a chat or an email sent with basic responsible gaming rules, information about responsible gaming tools available and their functionality, and help links and shall herewith enable responsible gambling practices and raise awareness.

7.2 Major Interaction

A major interaction is considered if the signs of problematic gambling behaviour are Medium to High. This interaction is personalised and addresses the certain concerns directly and shall take place via email or phone call.

8. Protecting Minors

It is illegal for anyone under the age of 18 or of legal age to participate in gambling, according to the legislation of the country of their residence to open an account or to gamble at an online casino, or any other gambling or betting site.

We take our responsibilities in this regard very seriously. During the registration process, players are required to confirm they meet the legal gambling age (18+, or higher as required by their jurisdiction) during registration. To ensure compliance, the system both validates the entered date of birth against the minimum age and requires players to actively acknowledge their age via a dedicated checkbox. Additionally, a sign indicating the legal age of gambling is placed on site (18+).

We reserve the right to request proof of age documentation from any client at any time and to suspend any accounts until this is provided. We further reserve the right to forfeit all transactions and return all deposits to anyone under the minimum age.

To avoid abuse, players are advised to keep login data safe from any minors. For parents with children under the minimum age, we recommend a filter program to avoid minors, especially children, to access any context on the internet, which is not healthy for them. For parents we can recommend a list of internet filters, to support them, from keeping their children from any context, which was not made for them, such as

<https://famisafe.wondershare.com/internet-filter/best-internet-filters.html>

Helpful tips if you live with minors:

- Do not use autofill for your login details
- Always log out after your gambling session
- Keep your usernames and passwords safe
- Make sure that your credit card details are kept safe

9.NOVA - RG risk scoring tool

Leveraging real-time data through API integrations with the platform and payment tools, our RG risk scoring tool, built on flows.world (a no-code automation platform for iGaming businesses), provides a sophisticated analysis of player risk. The system dynamically evaluates a range of factors, including deposit patterns, session length, and demographic risks, among others, to generate a comprehensive risk profile. This real-time analysis enables us to proactively identify and support players who may be at risk of developing gambling-related issues.

9.1 Scoring

	From	To	Tag
Low risk	-	2	NovaL
Low-Medium risk	3	7	NovaLM
Medium risk	8	15	NovaM
Medium-High risk	16	25	NovaMH
High risk	26	+	NovaH

9.2 Tool logic

Rule	Flow name	Flow ID	Trigger	Block	Add points	Max points per player	Logic
1	New reg high loss	CWn2gMuoO0aRvT4maEUwyw	Casino Fund Txn	max every 7 days per player (max 30 days after first dep	2	8	Loss is more than 1000 in 30 days after first dep
01/02	New Depositor High Deps	R9tA1pZf2Ei7J47FfDnrxw	Deposit Call Back	once per player	2	2	deps of 1.5k in 7 days after first dep, OR deps of 5k in 30 days after first dep
2	Age score	Obixt7m1I0a nKHs9GTN9I A	Authenticat ion	once per player	1	1	player is younger than 25 or older than 65
3	Velocity deposit score	qopSWr1AFk63b8oOjWZCxQ	Deposit Call Back	every 3 days	3	30	player deposits 6 times in 3 hours
5	Failed deps score	PM_jhUyFdkOj-CWA14GzpQ	Deposited Call Back	once every 24h	2	60	3 failed deps in 5 hours due to no_funds (insufficient funds)
6	Frequent Logins	pyntg9HEcEWmtdHph_0Vzg	Authenticat ion	check per player per 7 days	1	4	player has at least one successful dep in the last 3 days, logs in 15 times in 7 days OR logs in 20+ times in 7 days
7	Unsocial Hours	J8tZ3aQGGQ0qWdQRBTdzfGw	Authenticat ion	once per player every 12h	1	30	player logs in in unsocial hours (between 2am and 6am players time)
7/2	Unsocial Hours Canada	17ctw1ntnEGvD6Pg	Authenticat ion	once per player every 12h	1	30	player logs in in unsocial hours (between 2am and 6am players time) -

		RKGUtg					specifically Canada due to various time zones
8	High Losses	uvpnF Trf506 M8Elb NrC5v A	Deposited Call Back	1-7-30	4 - 5	150	high net deps in 1 day of 1000, OR 7 days of 3000, OR 30 days of 5000 EUR
9	RG interactions	BR26A JhcLU e-aPDt C4RhA Q	Tags Change	NA	-1 - -5	-13	player receives RG interaction
12	Long Betting Session	2rYFX 4FXjE2 ntPWM y8Uel Q	Casino Fund Txn	once per player per 12 hours	2	120	makes a bet every 10 mins for 5 consecutive hours
13	RG Time Out Usage	ZFrUwj MLzUq OKeC w0Rw R9w	RG Cool Off	NA	3	270	player had more than 5 cool offs in 6 months

10. Marketing and Advertising

We are committed to providing a safe and responsible gaming environment with responsible marketing policies.

Marketing activities are guided by the following principles:

Strict Compliance: Adherence to all regulatory requirements, including those regarding responsible gaming and advertising.

Protection of Vulnerable Individuals: Commitment to preventing marketing activities that target or exploit vulnerable groups and excluding any self-excluded individuals.

Transparency and Honesty: Provision of clear, accurate, and non-misleading information in all marketing materials.

Responsible Promotion: Promotion of gambling as entertainment, not as a means of financial gain.

Affiliate and Partner Accountability: Ensuring all business partners comply with our responsible marketing standards.