

Responsible Gaming Policy

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Responsible Gaming Policy

CW Marketing B.V.

1. Introduction

CW Marketing B.V. is committed to offering a safe, secure, and enjoyable gaming environment. We recognize that, while gaming is a form of entertainment for the vast majority of players, a small percentage may experience problems. This Responsible Gaming Policy outlines our commitment to protecting players, supporting safe behavior, and complying with regulatory requirements of the Curaçao Gaming Authority and Curaçao licensing framework.

2. Our Responsible Gaming Commitment

We are committed to:

- Preventing underage gambling.
- Helping players make informed decisions about their gaming behavior.
- Providing tools that support responsible gambling.
- Offering guidance and access to professional help where necessary.
- Training staff to identify and manage problematic behavior.
- Collaborating with industry stakeholders and support organizations.

3. Protection of Minors and Identity Verification

CW Marketing B.V. strictly prohibits underage gambling. No person under the age of 18 (or higher where required by local laws) is permitted to register or participate on our platforms.

We conduct robust age and identity verification checks to prevent access by minors. Additionally, we promote awareness among parents and guardians regarding internet monitoring and the dangers of underage gambling. We recommend the use of parental control software such as NetNanny or CyberPatrol, and display prominent warnings about underage access.

4. Customer Risk Profiling and Monitoring

We actively monitor player behavior using automated risk-detection tools. These systems identify signs of harmful patterns such as chasing losses, frequent deposits, extended playing time, or night-time logins.

Players are encouraged to complete voluntary self-assessment questionnaires available in their account area to help evaluate their gambling behavior. Alerts may trigger when indicators of problematic gambling are detected, prompting player notifications and potential account review.

5. Player Self-Assessment and Responsible Gambling Guidelines

At CW Marketing B.V., we recognize that behavioral addictions such as gambling can be difficult to identify, especially since they are not associated with substance use. The distinction between enjoyment and problematic behavior can become blurred. For this reason, we provide players with educational resources and practical tools to help them make informed decisions and stay in control.

Self-Assessment Tool

Players are encouraged to complete our **voluntary self-assessment questionnaire**, available in their account section. This tool offers players the opportunity to reflect on their gambling behavior, including emotional triggers, play frequency, and financial control. While not a diagnostic test, it is designed to help raise awareness of early warning signs.

Some **indicators of problematic gambling behavior** may include:

- Constant preoccupation with gambling.
- Gradual increase in bet amounts over time.
- Unsuccessful attempts to stop or limit play.
- Feelings of irritability or restlessness when trying to reduce gambling.
- Using gambling as a form of escape from problems or discomfort.
- Chasing losses.
- Lying about gambling behavior to friends or family.

- Jeopardizing relationships or work due to gambling.
- Borrowing money to continue playing.
- Engaging in illegal acts related to gambling behavior.

If a player identifies with five or more of these signals, they may be at risk of developing a gambling problem and are encouraged to use our safer gambling tools or seek professional help via the support resources listed on our website.

Responsible Gambling Principles

To help maintain gambling as a form of entertainment, we recommend following these guidelines:

- Play only when you feel calm and focused.
- Take regular breaks during gaming sessions.
- Set a monthly budget for gambling — and stick to it.
- Define a maximum loss limit before you begin playing.
- Set a target win limit and stop once it's reached.
- Never gamble under the influence of alcohol or drugs.
- Avoid gambling when feeling distressed, anxious, or depressed.
- Use the responsible gaming tools we provide — such as deposit limits, time-outs, and self-exclusion — whenever you feel the need to take a break or regain control.

These rules are aimed at supporting healthy gaming habits and minimizing harm. We are committed to fostering a safe and enjoyable gaming environment for all players.

6. Responsible Gambling Tools Available to Players

CW Marketing B.V. provides the following tools to support player control:

- Deposit limits (Limits can be set daily, weekly, or monthly. Requests to **increase** deposit limits take effect after 24 hours. Requests to **decrease** take effect immediately).
- Time-outs and temporary breaks.

- Self-exclusion options.
- Access to full account history including gameplay, deposits and withdrawals.

These tools are easily accessible through the player's account and can be adjusted at any time.

7. Advertising and Marketing Ethics

Our advertising complies with all Curaçao regulatory guidelines. We ensure marketing messages are not misleading, do not target minors or vulnerable populations, and include responsible gambling warnings. Players can opt-out of promotional communications at any time.

8. Staff Training and Escalation Procedures

CW Marketing B.V. ensures that all employees involved in customer interaction—particularly those in Customer Support, VIP Management, and Marketing—receive thorough and ongoing training on Responsible Gaming (RG) principles and intervention protocols.

Training Scope and Frequency

- All relevant staff are trained to recognize behavioral indicators of gambling-related harm, including emotional distress, repeated deposit escalations, reversal of withdrawals, or excessive time spent gambling.
- Staff are equipped with the skills to initiate structured, sensitive conversations with at-risk players and to guide them toward available RG tools such as deposit limits, cooling-off periods, or self-exclusion.
- Practical role-playing exercises and simulations are conducted regularly to improve confidence and consistency in handling real-life RG situations.
- Compliance and RG personnel receive **quarterly updates** on industry trends, emerging risks, and developments in gambling psychology.
- New hires complete RG training as part of their onboarding and are certified prior to engaging in any customer-facing roles.

9. Protection of Self-Excluded Players

We maintain a secure register of self-excluded users and prevent them from accessing accounts or receiving marketing communications. Attempts to reopen accounts during exclusion periods are actively blocked and flagged.

We offer to the players the option to self-exclude from all gambling activity in accordance with applicable regulatory requirements, including LOK clause 5.4(2).

Self-exclusion operates under the following principles:

1. Duration

Long-term self-exclusion periods of at least one (1) year are offered.

2. Brand Coverage

Self-exclusion applies automatically across all brands and domains operated under the Operator's license.

3. Vertical Coverage

Self-exclusion applies to all gambling activity offered by the Operator.

4. Marketing

Upon activation, players are automatically opted out of all marketing communications for the duration of the self-exclusion period.

10. Cooperation with Support and Treatment Services

We maintain partnerships with reputable international and regional support organizations, including helplines and live chat services. Contact details are prominently available in the Responsible Gaming section and are also provided automatically during specific user interactions where risk is flagged.

We recommend the following support providers:

- www.begambleaware.org
- www.gamblersanonymous.org
- www.gamblingtherapy.org

11. Continuous Review and Policy Improvement

Our Responsible Gaming Policy is reviewed regularly to ensure alignment with regulatory expectations and best practices. Player feedback, academic research, and monitoring reports are used to improve our internal protocols and player protection systems.

12. Responsible Gaming Officer

CW Marketing B.V. appoints a dedicated **Responsible Gaming Officer** (or, until formally designated, the Compliance Officer) to oversee the implementation and enforcement of this Responsible Gaming Policy. This individual is also responsible for preparing and submitting a formal report to the management team at least once every twelve (12) months, assessing the policy's effectiveness and recommending improvements where necessary.