

Responsible Gaming Policy – Atlas Tech Solutions B.V.

Website: <https://pro1bet.com/>

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Registered Address: Abraham Mendez Chumaceiro Boulevard 03, Curaçao

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Approved by
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1. Introduction

Atlas Tech Solutions B.V. (the Operator), operating the website pro1bet.com, is committed to providing a safe, transparent, and responsible gaming environment for all players. This Responsible Gaming Policy sets out the principles, measures, and procedures that ensure gambling remains an enjoyable form of entertainment and does not cause harm to players or third parties.

This Policy has been developed in accordance with the Curacao Gaming Authority (CGA) Responsible Gaming Policy (Version 1.0, 17 April 2025) and the applicable provisions of the National Ordinance on Games of Chance (LOK). It covers all mandatory Responsible Gaming elements as defined by the CGA, including age verification, information accessibility, behaviour tracking, player self-assessment, cooling-off periods, self-exclusion, deposit limits, marketing standards, and staff training.

2. Scope and Objectives

This Policy applies to all online gaming services provided by Atlas Tech Solutions B.V. through pro1bet.

The main objectives of this Policy are to:

- Protect minors and other vulnerable persons from gambling-related harm.
- Prevent underage gambling through robust age verification processes.

- Provide players with clear information and practical tools to control their gambling behaviour.
- Monitor player behaviour and identify early signs of problematic gambling.
- Provide structured interventions, including cooling-off and self-exclusion mechanisms.
- Ensure that all advertising and promotions are socially responsible and compliant with CGA standards.
- Train staff to recognise and respond appropriately to indicators of gambling-related harm.
- Maintain transparent reporting and cooperation with the Curacao Gaming Authority.

3. General Responsible Gaming Principles

Atlas Tech Solutions B.V. integrates Responsible Gaming principles into its business model. The Operator:

- Maintains a clear Responsible Gaming (RG) section on the website, available at all times.
- Provides Responsible Gaming tools, including deposit limits, cooling-off, and self-exclusion.
- Implements monitoring mechanisms to detect and address problematic gambling behaviour.
- Complies with regulatory reporting and auditing obligations imposed by the CGA and other authorities.
- Does not, under any circumstances, provide credit to players for the purpose of wagering. All gambling must be funded from cleared player funds only.

4. Governance and Responsibility

Atlas Tech Solutions B.V. appoints a Responsible Gaming Officer who is responsible for implementing, monitoring, and reviewing this Responsible Gaming Policy and associated procedures. Where a dedicated Responsible Gaming Officer is not yet appointed, these tasks are carried out by a designated Compliance Officer (excluding AML/CFT responsibilities).

The Responsible Gaming Officer will:

- Oversee the implementation of all Responsible Gaming tools and controls.
- Monitor the effectiveness of the Responsible Gaming framework on an ongoing basis.
- Ensure that staff receive appropriate Responsible Gaming training and that training is documented.
- Provide a written report to the management of Atlas Tech Solutions B.V. at least once every twelve (12) months on the effectiveness of this Policy, including recommendations for improvements.

- Ensure that any material changes to this Policy are documented and reported to the Curacao Gaming Authority as required.

5. Prevention of Underage Gambling

Participation in games of chance on pro1bet.com is strictly limited to persons aged 18 years or older. In accordance with Article 1.4(d) of the LOK, it is prohibited for the Operator to allow a minor to participate in games of chance.

To prevent underage gambling, Atlas Tech Solutions B.V. implements the following measures:

- During registration, players must enter their date of birth and confirm via a checkbox that they are at least 18 years old.
- Identity and age are verified using a government-issued identification document (such as passport, national ID, or driver's licence) when specified thresholds are reached and in all cases prior to the first withdrawal.
- Secondary verification methods (e.g. payment method checks, electronic databases, selfies) may be used to supplement document checks but do not replace the requirement for a valid government ID.
- If the Operator becomes aware that a player is a minor, the account is closed immediately. Deposits are refunded where required by civil law, any winnings are forfeited, and the player is informed of the reason for closure.
- Atlas Tech Solutions B.V. maintains detailed records of all age verification checks and their outcomes, which are made available to the Curacao Gaming Authority upon request.

6. Player Information and Accessibility

6.1 Responsible Gaming Section

Atlas Tech Solutions B.V. maintains a dedicated Responsible Gaming section on pro1bet.com. This section:

- Is clearly identifiable and accessible from the homepage and website footer.
- Provides clear and understandable information about Responsible Gaming and the risks associated with gambling.
- Includes direct access to tools such as deposit limits, cooling-off and self-exclusion.
- Explains how players can contact the Operator with Responsible Gaming concerns via email or live chat.
- Is available in English and in the languages of the Operator's target markets, with the English version prevailing in case of discrepancies.

6.2 Homepage Accessibility

A clear link to the Responsible Gaming section is displayed on the homepage of pro1bet.com. Contact channels for Responsible Gaming concerns are made accessible within the help or support areas.

6.3 Terms & Conditions Inclusion

Responsible Gaming commitments and the description of available tools are referenced in the website's Terms & Conditions. The Terms & Conditions are accessible within one click from the homepage. Players are informed during registration and in the Responsible Gaming section about the existence and functionality of these tools.

6.4 Footer Requirements

The footer of pro1bet.com contains at least the following information:

- A clear indication that gambling is prohibited for persons under 18 (e.g. 18+ symbol).
- The full legal name and registered address of Atlas Tech Solutions B.V.
- The official licence number issued by the Curacao Gaming Authority.
- A statement confirming that Atlas Tech Solutions B.V. is regulated and supervised by the Curacao Gaming Authority.
- A direct link to the Responsible Gaming section.
- The CGA digital seal (where applicable).
- Links to recognised problem gambling support organisations (such as GamCare, Gamblers Anonymous, GambleAware) and, where available, local support services in target markets.

7. Player Self-Assessment

Atlas Tech Solutions B.V. encourages players to regularly reflect on their gambling behaviour. To support this, the Operator:

- Provides players with access to detailed records of their betting and wagering history, including transaction timestamps, for at least the last six (6) months via their player account.
- Provides longer periods of history upon request within a reasonable timeframe, subject to legal requirements and technical feasibility.
- Offers self-assessment resources, such as links to the Gamblers Anonymous 20-question test and other recognised screening tools (e.g. adapted CAGE questionnaire).
- Encourages players who identify signs of problematic gambling through self-assessment to use Responsible Gaming tools and to seek professional help where needed.

8. Behaviour Tracking and Risk Monitoring

Atlas Tech Solutions B.V. actively monitors player behaviour to detect signs of problematic gambling and to intervene when necessary. Behaviour tracking is conducted using a combination of platform analytics and observations by trained staff (e.g. customer support and VIP managers).

Indicators of potential risk may include, but are not limited to:

- Sudden and unexplained increases in deposit amounts or wagering frequency.
- Frequent reversal of withdrawal requests.
- Repeated failed payment transactions (e.g. due to insufficient funds).
- Extended or unusually long gaming sessions without breaks.
- Increased contact with customer support showing agitation, desperation, or distress related to gambling.
- Frequent changes to deposit limits or repeated use of cooling-off options.
- Attempts to open multiple accounts to bypass limits, exclusions, or other controls.
- Use of multiple payment methods or personal details suggesting evasion of restrictions.

8.1 Player Profiling and PAM Recordkeeping

Atlas Tech Solutions B.V. maintains player profiles containing relevant transactional and behavioural data for the purposes of risk assessment. A risk-based approach is used to determine the extent of monitoring and the nature of interventions.

All Responsible Gaming-related interactions—whether initiated by the player or by the Operator—are recorded in the Player Account Management (PAM) system. This includes the indicators of concern, the content of any communication, and the actions taken (e.g. applying limits, cooling-off, self-exclusion, or operator-initiated exclusion). These records are retained in accordance with applicable retention periods and are available for regulatory review.

8.2 Responsible Gaming Interventions

When indicators of at-risk or problematic gambling behaviour are identified, Atlas Tech Solutions B.V. follows a structured intervention process, which may include:

- Informing the player about Responsible Gaming tools (deposit limits, cooling-off, self-exclusion).
- Sending advisory or educational messages encouraging the player to review their gambling activity.
- Applying mandatory measures such as reduced deposit limits or temporary suspension of the account, where appropriate.

- Imposing an operator-initiated exclusion in cases of severe or persistent risk or suspected criminal activity (see Section 11).

Responsible Gaming measures must never be used as a pretext to delay or prevent legitimate withdrawal requests. All interventions are undertaken solely for player protection and harm minimisation, not for financial gain by the Operator.

9. Cooling-Off Periods

Cooling-off allows players to take a short-term break from gambling activity. During a cooling-off period, the player cannot place bets or participate in games, but may still log into their account for non-gambling purposes (such as viewing history or withdrawing funds).

Cooling-off is a self-directed tool, available through the Responsible Gaming section. Atlas Tech Solutions B.V. provides clear, neutral information about its effects and does not attempt to dissuade players from using it.

9.1 Options and Effects

The following cooling-off durations are available:

- 24 hours
- 7 days
- 1 month
- 3 months

Depending on technical implementation, cooling-off may apply to:

- All gambling activity on the current brand (default).
- Specific gambling verticals (e.g. casino, sportsbook, poker), where supported.
- All brands and domains operated by Atlas Tech Solutions B.V. under the same licence, where implemented.

During a cooling-off period:

- No bets or wagers may be placed in the scope of the cooling-off settings.
- The player may still log in to view their account and withdraw available funds.
- If the player opts out of marketing, no promotional or bonus communications are sent during the cooling-off period.
- No new bonuses or incentives are granted for the purpose of encouraging play during the cooling-off period.

Cooling-off takes effect as soon as the player confirms their selection. For longer cooling-off periods (e.g. 1 or 3 months), a simple online confirmation step may be used, expressed neutrally (e.g. "You have chosen to cool off for one month. Please confirm."). At the end of

the chosen period, the account is automatically reactivated for gambling without any further action required by the player.

10. Self-Exclusion

Self-exclusion is a long-term, irrevocable measure for players who recognise that they have a gambling problem or are at high risk. During self-exclusion, the player cannot access any gambling services provided by Atlas Tech Solutions B.V.

Self-exclusion can be initiated and completed entirely online via the Responsible Gaming section, without the need for email communication or operator approval.

10.1 Duration and Scope

The following self-exclusion periods are available:

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime

Self-exclusion applies to:

- All gambling activity across all product verticals.
- All brands and domains operated by Atlas Tech Solutions B.V. under the same Curacao licence.
- Any future products added under the same licence while the exclusion remains active.

When a player selects self-exclusion, the website may present a neutral confirmation message such as: "You have chosen to self-exclude for 5 years. Please confirm." Once confirmed, the following apply:

- The player's account is closed for gambling purposes and the player cannot log in to place bets or play games.
- The Operator implements reasonable technical and procedural measures to detect and prevent the creation of new accounts by the same individual, including checks using personal and payment data.
- No direct marketing or promotional communications are sent for the duration of the self-exclusion.
- Any ante-post bets or active tournaments are handled according to applicable legal and regulatory requirements; no new bets or participation in tournaments are permitted after self-exclusion takes effect.

- Where legally and technically feasible, payment methods linked to a self-excluded player are blocked from being used during the exclusion period, to prevent circumvention.

If any wagering occurs after the self-exclusion request but before the exclusion is fully applied, such bets may be voided and the related funds returned to the player, subject to applicable civil law and AML/CFT requirements.

10.2 Reactivation After Self-Exclusion

Self-exclusion is irrevocable for the duration selected by the player. After the expiry of the self-exclusion period:

- The player must actively request reactivation in writing (e.g. by email or live chat).
- Atlas Tech Solutions B.V. will not initiate contact with a self-excluded player to encourage a return.
- Upon receiving a reactivation request, Atlas Tech Solutions B.V. may perform further assessments before reactivating the account.
- Records of self-excluded players and all related decisions are retained in line with applicable retention requirements.

11. Operator-Initiated Exclusion

Atlas Tech Solutions B.V. may impose an operator-initiated exclusion where necessary to protect the player or the integrity of its services. Such exclusion may be applied in situations including, but not limited to:

- Evidence or strong suspicion of problematic or compulsive gambling behaviour.
- Evidence or strong suspicion of fraud, money laundering, or other criminal or abusive activity on the platform.
- Serious breaches of the Terms & Conditions affecting player safety or platform integrity.

Players are never excluded solely on the basis of the amount of their winnings. All operator-initiated exclusions are documented, including the reasons, dates, and actions taken, and such records are retained for at least five (5) years or longer where required by law. These records are available to the Curacao Gaming Authority upon request.

12. Limits and Player-Control Tools

Atlas Tech Solutions B.V. offers various tools to help players manage their gambling, including deposit limits and other optional controls, where technically supported.

12.1 Deposit Limits

Players can set daily, weekly, or monthly deposit limits. Once a set limit is reached, no further deposits can be made until the relevant period resets.

Where supported by the system, the following principles apply:

- Requests to lower (tighten) an existing deposit limit take effect as soon as reasonably possible and no later than 24 hours after the request.
- Requests to increase (relax) an existing deposit limit only take effect after a 24-hour waiting (cooling-off) period.
- Existing wagers and pending bets remain valid and are settled according to the applicable rules, even after a new limit is set; no new wagers may be placed once the limit is reached.

13. Staff Training and Readiness

Atlas Tech Solutions B.V. ensures that all relevant staff, particularly those in customer-facing roles (such as customer support and VIP managers), as well as those involved in Responsible Gaming oversight, receive regular training on Responsible Gaming topics. Training covers, at a minimum:

- Fundamental Responsible Gaming principles and regulatory requirements.
- Recognition of behavioural indicators that may signal gambling-related harm.
- How to communicate sensitively and effectively with at-risk players.
- How to provide information about Responsible Gaming tools and external support organisations.
- Internal escalation and reporting procedures, including when and how to refer cases to the Responsible Gaming Officer.

Training is provided during onboarding and refreshed periodically. All training activities are documented.

14. Consumer Advertising and Marketing

Atlas Tech Solutions B.V. is committed to responsible advertising and marketing practices in line with CGA requirements. In particular, the Operator:

- Does not knowingly or deliberately target Vulnerable Persons, including minors and self-excluded players.
- Does not portray gambling as a solution to financial difficulties or as a guaranteed way to achieve financial success.
- Does not present gambling as an investment or regular source of income.

- Does not mislead players about the chances of winning or the role of skill in games of chance.
- Does not use explicit sexual content or imply that gambling leads to improved attractiveness or social success.
- Does not link gambling to other risky behaviours such as drug use or excessive alcohol consumption.
- Ensures that minors are not featured in any gambling advertising or related materials.
- Presents all bonuses and promotions with clear and transparent terms and conditions.
- Includes a Responsible Gaming message or slogan and 18+ indication in appropriate advertising materials.

Affiliates, ambassadors, and influencers acting on behalf of Atlas Tech Solutions B.V. are informed about this Responsible Gaming Policy and are required, through contractual arrangements, to align their marketing communications with these standards.

15. Enhanced Responsible Gambling Measures

Given the nature of its business model, including potential high-risk features such as cryptocurrency usage and high-value play, Atlas Tech Solutions B.V. may implement enhanced Responsible Gambling measures beyond the minimum requirements, such as:

- Reality checks, including session timers and on-screen clocks in the player's local time zone.
- Optional loss, stake, or time limits, where technically feasible.
- Automatic or manual pop-up reminders triggered by certain behavioural indicators.
- Proactive contact from trained Responsible Gaming or customer support staff when risk patterns are identified.
- Providing links to third-party blocking or filtering tools (e.g. BetBlocker, Gamban, GamBlock) to help players restrict access to gambling sites.

16. Contact and Support

Players who need assistance with Responsible Gaming tools or who are concerned about their gambling behaviour can contact Atlas Tech Solutions B.V. through the following channels:

- Email: block@pro1bet.com
- Website live chat: available via the support section on pro1bet.com.

Where appropriate, players are also directed to independent gambling support organisations and counselling services available in their country or region.

17. Policy Review and Updates

This Responsible Gaming Policy is reviewed at least once every twelve (12) months by the Responsible Gaming Officer and management of Atlas Tech Solutions B.V., or more frequently if required by regulatory changes or operational developments. The review assesses the effectiveness of existing tools and procedures and identifies potential enhancements.

Any material updates to this Policy are documented and reported to the Curacao Gaming Authority where required. The most recent version of the Policy is published on pro1bet.com.