



POLICY DOCUMENT

Version 2025/1

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RESPONSIBLE GAMING

Glossary of Terms

- PAM: Player Account Management system used to track player behavior.
- RGO: Responsible Gaming Officer, designated compliance role.
- Self-Exclusion: Voluntary ban requested by player to restrict account access.
- Cooling-Off: Temporary break period from gambling initiated by player.
- Intervention: Operator action in response to at-risk gambling behavior.

Part I – Policy Framework

1. Introduction, Purpose, and Scope

This Responsible Gaming Policy (“RG Policy”) establishes the framework through which Everum N.V. complies with the Curaçao Gaming Control Board (CGA) Responsible Gaming Policy for Licensed Operators (17 April 2025).

The purpose of this document is to ensure:

- Player protection against gambling-related harm.
- Fairness, transparency, and accountability.
- Provision of practical player protection tools.
- Early detection and intervention of problem gambling behaviors.
- Compliance with Curaçao law and regulatory conditions.



Scope: This policy applies to all brands, domains, employees, affiliates, contractors, suppliers, and service providers operating under Everum's Curaçao license.

2. Regulatory References

This policy is guided by the following regulatory instruments:

- CGA Responsible Gaming Policy (17 April 2025)
- National Ordinance on Games of Chance (LOK)
- Curaçao licensing conditions
- AML/CFT Ordinance (where overlapping with customer protection)
- International best practice guidelines (e.g. European Responsible Gaming Standards, UKGC framework)

Implementation note: The Compliance Department must update this policy within 30 days of any regulatory or legislative changes issued by the CGA.

3. Governance and Oversight

Governance responsibilities include:

- Appointment of a Responsible Gaming Officer (RGO), reporting to the Compliance Officer.
- Quarterly Responsible Gaming performance reviews.
- Annual Responsible Gaming Effectiveness Report submitted to senior management.

The RGO is accountable for:

- Monitoring all RG tools and their effectiveness.
- Ensuring appropriate handling of self-exclusions and player protection requests.
- Conducting risk-based reviews of high-value player accounts.
- Maintaining direct liaison with the CGA during audits or inspections.

Escalation: All material breaches (e.g. failure to exclude self-excluded player) must be reported to the CGA within 72 hours.



Part II – Core Requirements

4. Age Verification (with Procedures)

Process:

- DOB self-attestation collected at registration.
- Players must submit government-issued ID before first withdrawal.
- Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification may be undertaken.

Controls:

- Immediate suspension of accounts found underage; deposits refunded; winnings voided.
- Monthly reporting on all underage detection cases.

Example Procedure: If a player registers with DOB indicating <18, the system blocks account creation. If suspicion arises post-registration, the account is locked pending documentation review.

5. Player Transparency and Information

Website Requirements:

- A permanent Responsible Gaming Section accessible from the footer.
- Clear explanation of:
 - House edge and odds.
 - Random Number Generator (RNG) fairness testing.
 - Risk of addiction and problem gambling indicators.
 - How to set limits and exclusions.

Quarterly audits are carried out to confirm that responsible gaming statements, disclaimers, and resources are displayed correctly in all active languages on all sites.



6. Player Protection Tools

Available Tools:

- Deposit Limits: daily, weekly, monthly. Increases require 24-hour cooling-off.
- Self-Exclusion: 1 year minimum, up to lifetime. Applies across all brands.
- Cooling-Off Periods: 24 hours –3 months, with immediate effect.
- Transaction History: online access to past 6 months. Extended upon request within 10 days.
- Self-Assessment Questionnaire: helps players assess gambling risk.

Additional Tools to be implemented:

- Loss Limits: based on net losses (wagered – winnings).
- Time Limits: reality checks every 60 minutes.

Audit: RG tools are tested quarterly to confirm functionality and proper logging in the PAM system.

7. Behavioral Monitoring and Intervention

Automated Monitoring:

The PAM system tracks indicators of risk, including:

- Rapid deposit increases.
- Cancelled withdrawals.
- Long sessions (over 6 hours).
- Repeated failed payment attempts.
- Frequent adjustments to RG tools.

Intervention Protocol:

- Level 1: Informative – email with responsible gaming advice.
- Level 2: Direct Contact – chat, phone, or email outreach.
- Level 3: Mandatory Action – enforced deposit/loss limits or temporary suspension.
- Level 4: Exclusion – account permanently closed.

Each intervention is documented with timestamp, staff ID, player response, and outcome.



8. Advertising and Marketing

Advertising Standards:

- Marketing must never target minors or vulnerable populations.
- No false guarantees of winnings or financial solutions.
- Ads must include “18+” and responsible gambling disclaimers.

Affiliate Management:

- Affiliates must sign compliance contracts obliging adherence to RG rules.
- Quarterly audits of affiliate marketing campaigns are required.
- Affiliates breaching rules will be terminated immediately.

9. Staff Training

Training Program:

- Mandatory onboarding training for all employees within 30 days of hire.
- Annual refresher course for support, compliance, marketing, VIP, and payments staff.

Content:

- Recognizing problem gambling behaviors.
- Handling requests for exclusion and limits.
- Escalation protocols to RGO.
- Ethical marketing practices.

Assessment:

- Staff must pass annual RG compliance test (minimum pass rate 80%).



Part III – Advanced Measures and Compliance

10. Enhanced Risk Controls (VIPs, Crypto, High-Value Players)

High-risk segments receive enhanced oversight:

- Stricter limits and monitoring thresholds.
- Manual review of transaction activity.
- Direct outreach for welfare checks.
- Mandatory KYC / EDD prior to play continuation.
- Enforced cooling-off periods if risk patterns detected.

11. Record Keeping and Reporting

- All RG interactions, limits, and exclusions are recorded in PAM.
- Records stored for minimum 5 years.
- Audit trails must be tamper-proof and accessible for CGA inspection.

Annual Report Content:

- Total self-exclusions.
- Total limits set and adjusted.
- Number of interventions (by level).
- Training completion rates and test results.

12. Prohibited Practices

Strictly prohibited:

- Extending credit to players for gambling.
- Using RG restrictions as justification to delay withdrawals.
- Sending marketing material to self-excluded players.

Breaches may result in disciplinary action, regulatory fines, and potential license suspension.

13. Review and Updates

This policy will be reviewed annually or sooner if required by:

- CGA issuing updated requirements.



- Identification of compliance breaches.
- Upgrades to PAM or RG tool functionalities.