

Responsible Gaming Policy

Version 1 – December 2025

Purpose:

This policy outlines mandatory responsible gaming (RG) measures for all licensed operators including Class innovation b.v. under the Curacao Gaming Authority (CGA), ensuring player protection, prevention of underage gambling, and mitigation of problem gambling behaviors as per the Responsible Gaming Policy for licensed Operators issued by the same CGA.

1. Policy Statement

Operators must ensure that gambling remains a safe and enjoyable activity, proactively protecting vulnerable persons and preventing gambling-related harm. Compliance with this policy is a licensing requirement under the LOK (National Ordinance on Games of Chance).

2. Scope

This policy applies to Class Innovation B.V. as a B2C licensed operators under the CGA.

Regulatory Framework

- **Governing Body:** Curaçao Gaming Authority (CGA)
 - **Legal Basis:** LOK (2024), CGA Responsible Gaming Policy v1.0 (2025)
 - **Transition Period:** 12 months for existing licensees to comply with enhanced requirements
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3. Roles and Responsibilities

- **Responsible Gaming Officer:** Each operator must designate a qualified individual responsible for RG policy implementation and reporting to management annually. The Company has engaged a full time compliance officer who shall also hold the responsible gaming key person.

Duties:

- Submit annual reports to management evaluating policy effectiveness
 - Coordinate staff training and audits
 - Ensure alignment with CGA's phased implementation schedule
- **Frontline Staff:** Customer service and VIP managers must monitor player behavior and flag potential risks. The Company engages experienced individuals who are fully trained in order to report and detect potential gambling issues from a registered end user, and who shall respectively report this to the compliance officer.

- **All Staff:** Must be trained in RG principles and procedures to ensure global awareness of the responsibility of the Company towards responsible gaming.
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4. Mandatory Requirements

Operators must implement the following RG elements;

- Age verification – We require players to accept that they are 18+ during registration. Furthermore, we also include the sign 18+ at the footer of the website and this is visible on all pages. This measure is already fully implemented on our website.
 - Information accessibility – A responsible gaming page can be found on our website.
 - Player self-assessments
 - Behavior tracking and intervention
 - Cooling-off periods
 - Self-exclusion
 - Deposit limits
 - Responsible marketing and advertising
 - Staff training
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5. Prevention of Underage Gambling

The Company shall follow the below process and action steps;

- **Process:** Rigorous age verification at registration, requiring government-issued ID before first withdrawal.
 - **Minor Detection Action:** Immediate account closure and refund of deposits if a minor is detected. Furthermore, the company shall report incident to CGA within 24 hours.
 - **Recordkeeping:** Maintain age verification logs for 7 years.
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6. Player Information and Accessibility

- **Responsible Gaming Section:** Clearly identifiable on homepage, available in English and the target market's language, with direct access to RG tools and support contacts.
 - **Terms & Conditions:** Must reference RG tools and be accessible within one click from homepage.
 - **Footer Requirements:** Must include underage gambling prohibition, operator details, CGA license number, digital seal, and links to support resources.
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7. Self-Assessment Tools

- Players must have access to their betting history for at least six months.
 - Self-assessment questionnaires (e.g., Gamblers Anonymous 20-question quiz, CAGE questionnaire) must be available and promoted.
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8. Behavior Tracking and Intervention

The Company shall;

- Continuous monitor for problematic behaviors (including but not limited to increased deposits, failed transactions, repeated withdrawal reversals).
- Documented procedures for player profiling, risk assessment, and escalation (e.g., mandatory limits, temporary suspension, permanent exclusion).
- All RG interactions shall be recorded in the Player Account Management system.
- **Risk Indicators:** Sudden deposit spikes, withdrawal reversals, maxed credit cards.

Category

Examples

Financial Sudden deposit spikes, repeated withdrawal reversals, maxed credit cards

Session Patterns Extended play sessions (>4 hours), frequent login attempts

Communication Aggressive bonus requests, agitation during support interactions

- **Escalation Protocol:**
 - **Low Risk:** Recommend RG tools via email.
 - **Moderate Risk:** Apply mandatory deposit limits.
 - **High Risk:** Temporarily suspend account or enforce self-exclusion
- **Records:** Log all interactions in Player Account Management (PAM) systems

9. Cooling-Off and Self-Exclusion

Operators must provide both mechanisms via the RG section, with clear explanations and no operator influence over player choice.

Comparison Table: Cooling-Off vs. Self-Exclusion

Feature	Cooling-Off	Self-Exclusion
Wagering	Player-selected (all/verticals)	All verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Login	Yes	No
Brands	Current or all operator brands (as selected)	All brands/domains under operator
Duration	Min 24 hours (see below)	Min 1 year (see below)
Changes	Can be made more restrictive	None
Antepost Bets	Remain	Refunded/cancelled
Active Poker Tournaments	Must be completed	Must be completed
Marketing	Opt-out option	All messages blocked
Activation	Self-executed online; limited operator input	Self-executed online; limited operator input
Reactivation	Automatic	Player-initiated

Cooling-Off Duration Options:

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

Self-Exclusion Duration Options:

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime¹

10. Limits

Operators must provide deposit limit tools, allowing players to set daily, weekly, or monthly caps.

Deposit Limit Rules:

- Once reached, no further deposits allowed until period resets.
- Increasing severity (lowering the limit) is immediate; decreasing severity (raising the limit) requires a 24-hour waiting period.

- Limits do not retroactively affect existing wagers or unresolved bets.

Other Limit Tools:

Operators may also offer loss limits, time limits, wager limits, and reality checks (session timers, periodic reminders). These shall be at the discretion of the Company.

11. Staff Training

All customer-facing and RG staff must be trained to:

- Identify signs of gambling distress
- Conduct sensitive interventions
- Direct players to support and RG tools.

Training shall be conducting upon onboarding and shall be also renewed each calendar year. Furthermore, quarterly refreshers training shall be conducted.

12. Marketing and Advertising

The Company shall;

- Not target or depict minors or vulnerable persons
 - Not portray gambling as a financial solution
 - Not misrepresent skill vs. chance
 - Ensure that all advertising must include a responsible gaming message and 18+ sign
 - Ensure that all Affiliates and third parties must comply with the operator's RG policy
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13. Enhanced Measures (Where Applicable)

The Company shall;

- Implement internet filtering tools for underage prevention
 - Implement direct player interaction and pop-up notifications for at-risk behaviors
 - Implement additional limits and reality checks based on risk profile
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14. Key Dates for the Implementation of the Policy

Requirement	Deadline	Key Actions
Age Verification	End Sep 2025	Government-issued ID checks on registration

Requirement	Deadline	Key Actions
RG Section	End May 2025	Accessible homepage link with tools (self-exclusion, cooling-off)
Self-Assessment Tools	End Sep 2025	Integrate Gamblers Anonymous 20Q or CAGE questionnaire
Behavior Tracking	End Mar 2026	Monitor deposits, withdrawals, session times, and failed transactions
Deposit Limits	End Mar 2026	Daily, weekly, monthly caps; 24h wait to decrease limits[
Staff Training	End Mar 2026	Train customer support/VIP teams to identify at-risk behaviors