

Responsible Gambling Policy

Curacao

BMbit N.V.

Company: BMbit N.V.

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1. Purpose

BMbit N.V., (hereinafter "the Company") is licensed by the Curaçao Gaming Authority (CGA) and is committed to promoting Responsible Gambling (RG) as an integral part of its operations. The Company implements this policy in full compliance with the National Ordinance on Games of Chance (LOK) and all CGA mandatory requirements as outlined in its 2025 Responsible Gaming Policy.

This policy outlines the Company's approach to:

- Preventing underage and vulnerable persons from accessing gambling services;
- Providing transparent access to RG tools and information;
- Monitoring gambling behaviours to prevent harm;
- Ensuring that all advertising and operations are carried out responsibly;
- Complying with CGA's regulatory oversight and audit requirements;
- This policy is reviewed at least annually and any material change is reported to the CGA.

The objective of this policy is to set out a framework for a responsible gaming environment and spread awareness of social responsibility throughout the Company. This compliance is maintained through a combination of proactive measures, early detection and monitoring, self-awareness initiatives, support, responsible gambling tools, advice, and well-trained front-line staff.

This policy is reviewed annually, or more frequently in case of any Regulatory or Legal changes or updates. The Company acknowledges that all employees, contractors, agents, consultants, partners, or other parties working on behalf of BMbit N.V. are responsible for complying with this policy.

The policy applies to all employees of the Company and aims to maintain high standards of player protection measures. The Company implemented policies and procedures to facilitate interaction with players whenever their gambling behavior indicates a risk of developing a gambling problem. All employees directly interacting with players receive training to ensure they understand gambling-related issues and know how to respond to them.

2. What is Responsible Gambling?

Responsible Gambling means gambling in a manner that remains within a player's control and does not lead to harm. It includes understanding the risks associated with gambling and the use of available tools to set limits or take breaks when needed.

The Company aims to ensure that:

- Gambling remains an enjoyable and safe form of entertainment
- Players are equipped with tools and information to manage their gambling behaviour
- Measures are in place to prevent problem gambling.

3. What is Problem Gambling?

Problem gambling is referred to as 'gambling addiction' or 'compulsive gambling'. This is an urge to gamble continuously despite harmful negative consequences or a desire to stop. Problem gambling is a common disorder that is associated with both social and family costs. The Company takes problem gambling very seriously and actively reviews customer accounts for signs of problem gambling.

Where an employee knows or suspects a customer to be a problem gambler the relevant measures will be taken to protect them as outlined within this Policy.

4. Preventing Underage Gambling

Under Curaçao law, article 1.4 of the LOK, individuals under 18 years of age (Minors) are strictly prohibited from gambling. The Company applies the following measures:

4.1. Age Verification Systems

- All users must submit their date of birth and confirm they are over 18 at registration (This begins with self-attestation, where the player is required to enter their date of birth and confirm they are over 18 by selecting a designated checkbox);
- Government-issued ID verification (passport, driver's license, or national ID) is mandatory before the first withdrawal or when triggered by risk thresholds;
- Additional verification methods may include selfie checks, database lookups, or third-party tools (these may be undertaken by the operator at its own discretion, but do not supersede the government-issued document requirement);
- Accounts found to be associated with minors are closed immediately, with deposits refunded and winnings forfeited.
- Records of all age verification processes and outcomes will be maintained by the operator according to the law.

4.2. Blocking Access by Underage Users

Only individuals over the legal age (18 years old) can register and access a user account and gaming account. During registration, all applicants are informed that they:

- Clear age restriction messages are displayed on the homepage, footer, and RG page;
- Parents are encouraged to use internet filtering tools such as BetBlocker, GamBlock, or Gamban to restrict access on shared devices;

- The Company maintains logs of age verification activities and submits them to the CGA on request.
- Regular Audits of Compliance with Age Verification Requirements: The Company conducts regular audits of its age verification processes to ensure ongoing compliance with the legal requirements. These audits help in identifying and rectifying any potential weaknesses in the age verification process. Accounts that are reported or suspected of being used by underage individuals are immediately disabled.

5. Responsible Marketing

The Company is committed to ensuring all advertising and promotional communications are carried out responsibly, in compliance with the Curaçao Gaming Authority's mandatory requirements. Our marketing strategy is designed to protect minors and vulnerable individuals, avoid misleading claims, and promote responsible gambling messages across all channels. Key commitments include:

- Our marketing communications do not target or appeal to children or young persons under 18. This is particularly monitored through the imagery and themes used in advertising, ensuring they do not reflect youth culture or utilize styles that have particular appeal to children, such as cartoon characters, exaggerated animations, and narratives common in children's stories or media.
- Our communications avoid misrepresentation of Gambling: Marketing will not suggest gambling is a solution to financial problems, an investment strategy, or a pathway to social/romantic success.
- Marketing communications are not placed in media where children or young persons make up a significant proportion of the audience or in media primarily targeted at such groups.
- Bonus Conditions and promotions are communicated with clear terms and conditions. The Company will never use misleading or ambiguous language or create incentives that encourage excessive gambling.
- Players who have opted for self-exclusion or cooling-off periods are removed from all marketing lists and will not receive promotional materials during the restriction.
- The Company ensures all affiliates, influencers, ambassadors, and external marketing partners receive and acknowledge the RG Policy. Paid influencers must not make unapproved claims or target restricted demographics.
- All marketing materials (online or offline) include a clearly visible Responsible Gambling slogan and a link to the Responsible Gambling section of the website.

6. Player Protection Information

The website includes an easily accessible Responsible Gambling section, which:

- Provides clear information on the risks of gambling
- Links to local and international support services (e.g., GamCare, GambleAware)
- Lists available RG tools including deposit limits, self-exclusion, cooling-off, and self-assessment
- Is available in English and in the language of the target market
- Includes an email/chat contact for RG support

The homepage footer includes:

- A warning against underage gambling
- Company name and CGA license number
- CGA Digital Seal
- A link to the RG page
- Local and international addiction support resources

Responsible product design, clarity of instructions, customer-friendly display of available Responsible Gambling tools, transparent Terms and Conditions, clear game rules, accessibility of transactions list, and bets history as well as trained customer service department available on chats are all helpful factors in keeping gambling under control and promoting well-thought-out gambling decisions.

7. Player Protection Tools

The Company provides a comprehensive suite of tools and information designed to help our customers manage their gambling behavior responsibly. These tools are easily accessible and prominently featured to ensure all players have the necessary resources to gamble safely. Tools available for customers to manage their gambling behaviour include:

Deposit Limits

Players may set daily, weekly, or monthly deposit limits. These:

- Take immediate effect when lowered
- Require a 24-hour cooling-off period to increase
- Cannot be overridden by operator promotions

Reality Checks and Time Limits

- Optional session reminders
- Player-accessible settings for break reminders or automatic logouts

Access to Betting History

- At least six months of betting records must be accessible within the player account
- Longer history available upon request within 10 business days

Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets. If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation

7.1. Cooling-Off

The Cooling-Off feature allows players to voluntarily suspend gambling activity for a defined short-term period while retaining access to account information and withdrawals.

a) Activation Process

- Players may self-select a cooling-off period from their account or request it via email or live chat.
- All elected options must be processed and activated within 24 hours.
- The Company does not delay, discourage, or question the player's decision to enter a cooling-off period.
- Cooling-off cannot be overridden by support agents or promotions.

b) Duration Options

Players can choose from the following:

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

c) Scope of Suspension

- All wagering activity is blocked during the selected period.
- Vertical-specific suspensions (e.g. Casino, Poker, Sports) may be offered.
- Players may select to suspend activity on just the current brand or across all Company-operated brands (if applicable).

d) Player Account Status

- Players retain access to withdraw funds.
- Ante-post bets or live tournaments remain active and must be completed before the restriction fully takes effect.
- No further bets can be placed until completion.

e) Marketing and Communication

- Players are given the option to opt out of marketing during their cooling-off period.
- No bonuses, promotions, or incentives are sent during the cooling-off window.

f) Reactivation

- Accounts are automatically reactivated at the end of the cooling-off period.
- No player action is required.
- The player is reminded of available RG tools upon return.

7.2. Self-Exclusion

Self-exclusion is a long-term restriction that prevents players from accessing any gambling services under the Company's license. This feature is voluntary, immediate, and irreversible for the selected period.

a) Activation

- Players may initiate self-exclusion directly through the website or via email/live chat.
- The process is self-serve and must not require agent intervention unless requested by the player.
- One brief online confirmation may be required (e.g., "You have selected a 1-year self-exclusion. Please confirm.")

b) Duration Options

- 1 year (minimum as per CGA)
- 3 years
- 5 years
- 10 years
- Lifetime

c) Account Implications

- Player accounts are closed and login access is revoked.
- The Company takes reasonable steps to detect and block duplicate or new accounts created by self-excluded players.
- Ante-post bets may be cancelled and refunded depending on the timing of the self-exclusion.
- Tournaments already in progress may be completed.

d) Marketing Restrictions

- Marketing communications must stop immediately upon self-exclusion.
- The player is removed from all promotional databases within 48 hours.
- Marketing opt-out is automatic and non-reversible during exclusion.

e) Cross-Brand Coverage

- Self-exclusion applies to all brands, platforms, and domains operated by the Company under its CGA license.

- Any related accounts under the same user identity must also be blocked.

f) Reactivation Process

- At the end of the exclusion period, only the player may request reactivation.
- This must be done in writing (via email or chat).
- The Company must not initiate reactivation or resume marketing unless the player has made a clear written request.

g) Permanent Exclusion

- If the player selected “lifetime” exclusion or disclosed addiction concerns, the account remains permanently closed and will not be reopened.

7.3 Behaviour Tracking and Player Interaction

The Company monitors player behaviour to detect risk indicators such as:

- Frequent failed deposits
- Reversal of withdrawals
- Unusually long sessions or sudden spikes in activity
- Multiple changes to RG limits or repeated use of RG tools
- Attempts to circumvent limits via multiple accounts

When risk is identified:

- Players are contacted with RG resources and tool suggestions
- Interventions may include applying limits, temporary suspension, or operator-initiated exclusion
- All actions and interactions are recorded in the Player Account Management (PAM) system
- Operators may not use RG interventions to delay legitimate withdrawals.

8. Training and Awareness

All customer-facing staff (including VIP and marketing teams) receive annual RG training. Training includes identifying risk, using records, and interacting with vulnerable players. Management receives an annual report on RG effectiveness and policy recommendations.

This training equips them with the necessary skills to identify signs of problem gambling, provide appropriate support, and take necessary account of restrictive actions.

The training materials and programs are under continual review and assessment to ensure they remain current and effective.

9. Monitoring, Reporting & Policy Updates

The Company designates a Responsible Gambling Officer, or a Compliance Officer if one is not appointed. This officer provides a yearly report to management. Any material changes to this policy are submitted to the CGA. This policy and its tools are available on the CGA portal for review and audit.