

RESPONSIBLE GAMING POLICY

[OPERATOR NAME]

Version 1.0

Effective Date: [DATE]

CGA License Number: [LICENSE NUMBER]

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1. INTRODUCTION

2.

Slotino.io ("the Operator") holds a B2C gaming license issued by the Curacao Gaming Authority (CGA) under license number [LICENSE NUMBER]. This Responsible Gaming Policy has been developed in accordance with the CGA's Responsible Gaming Policy for Licensed Operators, Version 1.0 (17 April 2025), and the National Ordinance on Games of Chance (LOK) of Curacao.

This policy outlines our commitment to providing a safe, transparent, and fair gaming environment where gambling remains an enjoyable form of entertainment rather than a source of harm.

3. POLICY STATEMENT AND COMMITMENT

The Operator is committed to fostering responsible gambling practices and protecting Vulnerable Persons from gambling-related harm. We integrate Responsible Gaming principles into all aspects of our business operations to ensure:

- Gambling remains entertainment, not a source of financial or personal harm
- Vulnerable Persons are identified and protected
- Players have access to tools and resources to manage their gambling behavior
- All regulatory requirements are met with transparency and accountability

General Principle: No credit shall be offered to players for the purpose of wagering.

Regulatory Compliance: Adherence to this Responsible Gaming Policy is a requirement under the LOK. Failure to comply will be addressed by the CGA in accordance with its monitoring and enforcement procedures.

4. DEFINITIONS

CGA - Curacao Gaming Authority

Cooling Off - A pre-determined period comprising hours, days, or months set by the player during which they may not place any wagers whatsoever

Games of Chance - Any game in which one or more players, in exchange for payment of money or monetary value, compete for prizes in money or monetary value, where the outcome is determined by chance only or by a combination of chance and players' insight or skill, including sports betting and poker

LOK - The National Ordinance on Games of Chance law of Curacao

Marketing, Promotion and Advertising - All resources, messages, and media that promote the operator's domain(s), brand(s), products, or services, including print, digital, content marketing, and social media campaigns

Minor - Any person under the age of 18

Operator - Slotino, holder of CGA B2C license [LICENSE NUMBER]

Self-Exclusion - A voluntary player-initiated event where a player bars themselves from all online gaming-related activities with the Operator

Vulnerable Person - As defined in LOK Clause 1.1(h):

1. Under eighteen years of age
 2. Has insufficient control over gambling behavior and is or threatens to become addicted to Games of Chance, causing harm to themselves or others
 3. Has been banned from playing any Game of Chance by force or at their own request
 4. Has been declared bankrupt
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5. RESPONSIBLE GAMING OFFICER

The Operator designates Adrian Toshkov as the Responsible Gaming Officer responsible for implementing and enforcing this policy.

Responsibilities include:

- Overseeing all Responsible Gaming initiatives
- Ensuring compliance with CGA requirements
- Training staff on responsible gaming practices
- Monitoring player behavior and implementing interventions
- Maintaining records of all responsible gaming activities
- Providing annual reports to management
- Reporting material policy changes to the CGA
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Annual Reporting: The Responsible Gaming Officer shall provide a report to the Operator's management team at least once every twelve (12) months regarding:

- Policy effectiveness
- Operational procedures
- Recommendations for enhancements
- Compliance status

Any material changes to this policy must be reported to the CGA.

6. PREVENTION OF UNDERAGE GAMBLING

Legal Requirement: Per Article 1.4(d) of the LOK, it is prohibited for the Operator to allow a minor to participate in games of chance.

5.1 Age Verification Process

Registration Requirements:

1. **Self-Attestation:** During account registration, players must:

- Enter their date of birth
- Confirm they are over 18 by selecting a designated checkbox
- Complete additional verification checks

2. Government-Issued ID Verification:

- Required at specified thresholds
- Mandatory prior to first withdrawal
- Acceptable documents: passport, national ID, or driver's license

3. Secondary Verification Methods (at Operator's discretion):

- Electronic verification systems
- Payment validation
- Third-party or government database checks
- Selfie verification

Note: Secondary methods do not supersede the government-issued document requirement.

5.2 Discovery of Minor Accounts

If the Operator becomes aware that a player is a minor:

- 1. Immediate Account Closure** - The account must be closed immediately
- 2. Refund All Deposits** - All deposits made by the minor must be refunded
- 3. Forfeit Winnings** - Any winnings are forfeited
- 4. Clear Communication** - The reason for closure must be clearly communicated to the minor

5.3 Record Keeping

The Operator maintains comprehensive records of all age verification processes and outcomes, available for regulatory review upon request.

5. PLAYER INFORMATION AND ACCESSIBILITY

6.1 Responsible Gaming Section

Slotino maintains a dedicated Responsible Gaming Section ("RG Section") on our website/app that:

- Is clearly identifiable and easily accessible
- Contains easily understandable information for informed decision-making
- Provides direct access to all responsible gaming tools including:
 - Self-exclusion
 - Cooling-off periods
 - Limit setting
 - Other responsible gaming measures
- Displays contact information for responsible gaming concerns (email and chat)
- Is available in English and and respective market languages
 - English version takes precedence in case of discrepancies

6.2 Homepage Accessibility

Our website/app homepage includes:

- Clear and visible link to the RG Section
- Contact information for responsible gaming concerns (email and chat)
- [18+ age restriction symbol]

6.3 Terms & Conditions

The Operator ensures:

- RG Section is explicitly referenced in Terms & Conditions
- Terms & Conditions are no more than one click from homepage
- Players are informed about responsible gaming tools, functionality, and usage

6.4 Footer Information

The website/app footer displays:

- Clear visual indication that underage gambling is prohibited
- Name and registered address of Slotino
- CGA license number: [LICENSE NUMBER]
- Statement confirming CGA regulatory oversight
- Link to RG Section
- CGA digital seal
- Direct links to gambling addiction support resources:
 - GamCare: www.gamcare.org.uk
 - Gamblers Anonymous: www.gamblersanonymous.org
 - GambleAware: www.begambleaware.org

7. SELF-ASSESSMENT TOOLS

7.1 Transaction History Access

Players can access detailed betting and wagering history including timestamps for:

- Minimum: Last 6 months (readily available)
- Extended: Upon request, provided within 10 working days

7.2 Self-Assessment Questionnaires

The Operator provides self-assessment tools to help players evaluate their gambling behavior via email if they spot a self harmful behavior:

CAGE Questionnaire (Adapted for Gambling)

Players are encouraged to answer honestly:

1. **C - Cut Down:** Have you ever felt you should cut down on your gambling?
2. **A - Annoyed:** Have people annoyed you by criticizing your gambling habits?
3. **G - Guilty:** Have you ever felt guilty about your gambling?
4. **E - Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting Results:

- 0 Yes Answers: Low risk for gambling problems
- 1 Yes Answer: Moderate risk; further assessment may be needed
- 2 or More Yes Answers: High risk; further evaluation and intervention strongly recommended

Alternative: Link to Gamblers Anonymous 20-Question Quiz:

<https://gamblersanonymous.org/20-questions/>

7.3 Recommendations

Players who recognize problematic behaviors through self-assessment are directed to:

- Available responsible gaming tools
- Self-exclusion options
- Professional support resources

7. BEHAVIOUR TRACKING AND MONITORING

Legal Requirement: Per Article 1.4(e) of the LOK, the Operator shall not give a person who can reasonably be assumed to be a Vulnerable Person the opportunity to play games of chance.

8.1 Monitoring Systems

Slotino employs comprehensive monitoring through:

- Frontline staff (customer service, VIP managers)
- Gaming platform features
- In-game tools
- Artificial Intelligence (AI) / Machine Learning (ML) technologies

8.2 Key Monitoring Factors

Important Note: Single factors do not necessarily classify a player as a problem gambler. Multiple indicators occurring simultaneously and consistently may trigger intervention.

Monitored Behaviors:

1. Deposit and wagering frequency - sudden unexplained increases
2. Repeated failed transactions due to insufficient funds
3. Reversing withdrawals multiple times
4. Pattern of inexplicable extended play sessions
5. Unreasonably increased customer support communication
6. Frequent requests for bonuses with signs of agitation
7. Frequent changes to responsible gaming tools
8. Repeated use of cooling-off periods
9. Players maxing out credit cards
10. Attempts to open multiple accounts to bypass limits

8.3 Player Identification and Intervention Procedures

8.3.1 Player Profiling and Risk Assessment

Slotino:

- Establishes and maintains player profiles with relevant data points
- Adopts a risk-based approach for monitoring levels
- Records all responsible gaming interactions in the Player Account Management (PAM) system
- Documents indicators of concern and actions taken

8.3.2 Responsible Gaming Interventions

For At-Risk Players:

1. Information Provision:

- Inform players of available responsible gaming tools
- Provide information on deposit limits, cooling off, and self-exclusion

2. Escalation Protocol:

- Apply mandatory deposit limits to player's account
- Temporarily suspend account pending further assessment
- Permanently exclude player in cases of severe or persistent risk

Critical Restriction: The Operator shall NEVER use responsible gaming measures to prevent or delay legitimate player withdrawals.

Misuse of protective interventions for financial gain constitutes a breach of license conditions.

9. COOLING OFF PERIOD

9.1 Overview

Players can activate a cooling-off period for temporary restriction from gambling activity.

Selection Categories:

1. **Duration** (Mandatory)
2. **Marketing Opt-Out** (Mandatory)
3. **Brand** (Optional - at Operator's discretion)
4. **Vertical** (Optional - at Operator's discretion)

Player Selection: All options selected via tick-box (no pre-checked boxes).

9.2 Duration Options

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

9.3 Vertical Options

- ALL gambling activity (default)
- Individual product verticals:
 - Casino (All Games)
 - Casino (Slots Only)
 - Fixed Odds Betting
 - Poker
 - [Other P2P Games]

9.4 Brand Options

- Current brand (website/app where initiated)
- All Operator brands

9.5 Marketing

- Opt-out option available

9.6 Implementation

Timing:

- Restrictions take effect **immediately**
- No questioning of player's decision
- No bonus offers or promotions to continue playing
- No delays or complications in activation

Verification Check (for 1 or 3 month periods): Neutral confirmation message only: "You wish to cool off for [PERIOD]. Please confirm."

During Cooling Off:

Feature	Status
Wagering	Prohibited (as selected)
Deposits	No
Withdrawals	Yes
Account Login	Yes
Brands	As selected
Marketing	Opt-out if selected
Ante-post Bets	Remain active

Active Poker Tournaments Must be completed

Exceptional Activation: In exceptional cases, players may request cooling off via email/chat. Operator must enable within 24 hours.

9.7 Reactivation

- **Automatic** after selected period expires

- No further player action required

10. SELF-EXCLUSION

10.1 Overview

Self-exclusion is a long-term, irrevocable exclusion from ALL gambling activities under the Operator's license.

Automatic Settings:

- Duration: Player selected (minimum 1 year per LOK 5.4(2))
- Brand: ALL brands/domains under Operator's license
- Vertical: ALL gambling activity
- Marketing: Automatic opt-out
-

10.2 Duration Options

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

10.3 Process

Completion Method:

- Primary: Fully online self-service (no email or operator approval required)
- Exceptional: Via email or chat if technical issues occur
 - Must be enabled within 24 hours

Player Selection: Duration selected via tick-box; all other elements automatic.

Players Must:

- Be clearly informed of differences between cooling off and self-exclusion
- Be offered opportunity to proceed directly to self-exclusion if self-identifying as vulnerable
- NOT be guided toward one option over another
- NOT receive interference, bonuses, or reassurances

10.4 Implementation

Timing:

- Restrictions take effect **immediately**
- Wagering after self-exclusion request but before implementation must be voided and funds returned
-

Verification Check: Simple neutral online confirmation: "You have chosen to self-exclude for [PERIOD]. Please confirm."

Operator Must NOT:

- Question player's decision
- Offer bonuses or promotions
- Delay or complicate activation
-

During Self-Exclusion:

Feature	Status
Wagering	Prohibited (all verticals)
Deposits	No
Withdrawals	Depends on civil law
Account Login	No (account closed)
Brands	All brands/domains blocked
Marketing	All messages blocked
Ante-post Bets	Refunded/cancelled (subject to AML/CFT)

Feature	Status
Active Poker Tournaments	Must be completed
Progressive Jackpots	Prior contributions remain; no future participation
Duplicate Account Prevention: The Operator implements robust measures to identify and prevent self-excluded individuals from creating new accounts under different credentials.	

Payment Method Blocking: Where possible and compliant with regulations, payment methods used by self-excluded players are blocked during the exclusion period.

10.5 Reactivation

After exclusion period ends:

1. Player must request reactivation **in writing** (email or chat)
2. Request can be prompted by login attempt or unprompted via customer support
3. Operator cannot initiate reactivation communications
4. Self-exclusion is **irreversible and irrevocable** during the selected period

Record Retention: Records maintained per applicable retention periods (minimum 5 years).

11. OPERATOR-INITIATED EXCLUSION

The Operator may exclude a player as a high-risk intervention if:

1. Player displays problematic gambling behavior
2. Player attempts or engages in criminal activities through the platform
3. **NOT** solely based on the amount of winnings

Documentation Requirements:

- All operator-initiated exclusions must be formally documented
- Records kept for minimum 5 years
- Available for CGA review upon request
- Player must be informed of exclusion and reasons

Exclusion Process:

1. Assessment by Responsible Gaming Officer
2. Documentation of concerning behavior
3. Account suspension/closure
4. Notification to player
5. Entry in PAM system

12. DEPOSIT LIMITS

12.1 Overview

Players can set limits on total deposit amounts over defined periods to control gambling activity.

Available Timeframes:

- Daily
- Weekly
- Monthly

12.2 Implementation

How It Works:

- Player sets limit amount for selected period
- Once limit reached, no additional deposits allowed until period resets
- Limits can be applied anytime via RG Section

Limit Changes:

Change Type	Implementation Time
Increase severity (more restrictive)	Immediate
Decrease severity (less restrictive)	24-hour waiting period

Existing Wagers:

- Resolved or unresolved wagers placed before limit implementation remain unaffected
- No retroactive cancellations

12.3 Exceptions to Limits

Active Gameplay Scenarios:

When limit/exclusion is set during:

- Active poker tournament participation
- Unresolved ante-post bet on future event

Handling:

1. Restriction applies immediately to NEW wagering
2. Player cannot enter new tournaments or place new bets
3. Active gameplay must be completed
4. Upon completion, full restrictions apply

13. STAFF TRAINING AND READINESS

13.1 Training Requirements

Target Staff:

- Customer service representatives
- VIP managers
- Marketing team
- All staff with player interaction

Training Curriculum Includes:

1. Recognizing Gambling Distress:

- Signs of agitation
- Aggressive behavior
- Financial desperation indicators
- Excessive communication patterns

2. Communication Skills:

- Conducting sensitive conversations with at-risk players
- Professional and empathetic approach
- De-escalation techniques

3. Resource Direction:

- Available responsible gaming tools
- Support resources (internal and external)
- Escalation procedures

4. Policy Knowledge:

- Understanding of this RG Policy
- CGA requirements
- Legal obligations under LOK

13.2 Training Schedule

- Initial training for all new staff
- Annual refresher training for existing staff
- Additional training as policy updates occur
- Training records maintained for CGA review

14. CONSUMER ADVERTISING AND MARKETING

14.1 Prohibited Practices

The Operator does NOT engage in:

1. Targeting Vulnerable Groups

- No direct targeting of Vulnerable Persons
- No marketing featuring minors or depicting them with gambling content

2. Misleading Representations

- No portrayal of gambling as investment or financial solution
- No misrepresentation of skill vs. chance in chance-based games
- No emotional manipulation portraying gambling as substitute for well-being

3. Explicit Content

- No overt sexual or pornographic imagery
- No suggestions of seduction or enhanced attractiveness

4. Harmful Associations

- No linkage between gambling and:
 - Smoking
 - Drug use
 - Alcohol consumption
 - Other harmful behaviors

14.2 Required Practices

1. Responsible Gaming Messaging

- ALL advertising includes clearly visible RG message/slogan
- Examples: "18+ Only", "Gamble Responsibly", "When the fun stops, stop"

2. Transparent Bonus Conditions

- Clear terms and conditions for all bonuses/promotions
- No use of bonuses to encourage excessive gambling
- Wagering requirements clearly stated

4. Third-Party Responsibility

The Operator is responsible for materials provided to:

- Affiliates
- Representatives
- Sponsorships
- Ambassadors
- Social media influencers (for paid placements)

Requirements:

- All third parties made aware of this RG Policy
 - Contractual requirement to adhere to policy
 - Monitoring of third-party compliance
-

15. ENHANCED RESPONSIBLE GAMING MEASURES

Implementation Trigger: Enhanced measures implemented when:

- Business model is inherently high risk (skin betting, crypto, VIP/high rollers)
- Disproportionately high number of at-risk players identified
- Elevated exclusion/cooling-off rates observed

15.1 Internet Filtering Tools

Player Advisory: Adults sharing devices with minors should safeguard:

- Usernames and passwords
- Payment details
- Account access

Third-Party Blocking Tools: Links provided to:

- BetBlocker: www.betblocker.org
- GamBlock: www.gamblock.com
- Gamban: www.gamban.com

15.2 Direct Player Interaction

Automatic Notifications:

- Pop-up notifications for concerning behaviors
- Link to contact trained RG professional

Manual Intervention:

- Direct contact when behavior suggests vulnerability
- Advice to review RG area
- Guidance on available tools and support

15.3 Additional Limits (Optional)

Based on target market and player profile:

- **Loss Limits:** Maximum loss per period
- **Time Limits:** Maximum session duration
- **Wager Limits:** Maximum bet amount per wager

15.4 Reality Check (If Implemented)

Options Include:

1. Real-Time Session Timer

- Visible at all times while logged in
- Shows continuous session duration

2. Real-Time Clock

- Displays current time in player's time zone

3. Periodic Pop-Up Reminders

- At specified intervals
- Shows session duration
- Shows wins/losses during session

4. Player-Activated Reality Checks

- Customizable alert intervals
- Suspends play momentarily
- Requires confirmation to continue
- Option to end session or continue

15. RECORD KEEPING AND REPORTING

16.1 Records Maintained

The Operator maintains comprehensive records of:

Player Records:

- Age verification documentation and outcomes
- Player profiles and risk assessments
- Responsible gaming interactions (player and operator-initiated)
- Cooling off activations and completions
- Self-exclusion requests and durations
- Operator-initiated exclusions with justifications
- Deposit limit settings and changes
- Behavior tracking flags and interventions

Operational Records:

- Staff training completion records
- Marketing materials and third-party agreements
- Policy review and update history
- Annual effectiveness reports

Retention Period: Minimum 5 years, or as required by applicable laws and regulations.

16.2 CGA Reporting**Annual Report to Management:**

- Policy effectiveness assessment
- Statistical data on RG tool usage
- Identified trends in player behavior
- Staff training completion rates
- Recommendations for improvements

CGA Notifications:

- Material changes to RG Policy
- Significant incidents or concerns
- Compliance updates as requested

Audit Availability: All records available for CGA review upon request.

16. POLICY REVIEW AND UPDATES**17.1 Review Schedule**

This policy is reviewed:

- Annually by the Responsible Gaming Officer
- Following significant regulatory changes
- After material changes to business operations
- In response to identified deficiencies or trends

17.2 Update Process

Material Changes:

1. Review by Responsible Gaming Officer
2. Management approval
3. Notification to CGA
4. Staff training on updates
5. Implementation with monitoring

Version Control:

- Current Version: 1.0
- Effective Date: [DATE]
- Next Scheduled Review:

17.3 Management Commitment

The management of Slotino commits to:

- Full implementation of this Responsible Gaming Policy
- Adequate resource allocation for RG initiatives
- Continuous improvement of responsible gaming practices
- Transparent communication with regulators and stakeholders
- Prioritizing player welfare over commercial interests

APPENDIX A: RESPONSIBLE GAMING CONTACT INFORMATION

Internal Contacts:

Responsible Gaming Officer: Adrian Toshkov Email: adrian.toshkov@gmail.com Phone: 00359893576001

Customer Support (24/7): Email: support@slotino.io Live Chat: Available on website/app

External Support Resources:

International:

- GamCare: www.gamcare.org.uk | Helpline: 0808 8020 133
- Gamblers Anonymous: www.gamblersanonymous.org

- GambleAware: www.begambleaware.org

[Target Market] Local Resources:

- [LOCAL ORGANIZATION 1]: [WEBSITE] | [PHONE]
- [LOCAL ORGANIZATION 2]: [WEBSITE] | [PHONE]

APPENDIX B: IMPLEMENTATION CHECKLIST

Measure	Section	Target Date	Status
RG Policy Submitted to CGA	2	[DATE]	☐
RG Officer Designated	4	[DATE]	☐
Management Team Awareness	2	[DATE]	☐
Age Verification Process	5.1	[DATE]	☐
RG Section Created	6.1	[DATE]	☐
Homepage RG Link	6.2	[DATE]	☐
T&C Updated	6.3	[DATE]	☐
Footer Information Complete	6.4	[DATE]	☐
Self-Assessment Tools	7	[DATE]	☐
Behavior Tracking System	8	[DATE]	☐
Cooling Off Functional	9	[DATE]	☐
Self-Exclusion Functional	10	[DATE]	☐
Deposit Limits Functional	12	[DATE]	☐
Staff Training Complete	13	[DATE]	☐
Marketing Compliance	14	[DATE]	☐
RG Messages on Advertising	14	[DATE]	☐

Document Control:

Version Date Author Changes

1.0 [DATE] [NAME] Initial version per CGA guidelines

Approval:

Responsible Gaming Officer: _____ Date:

Chief Executive Officer: _____ Date:

This policy has been prepared in accordance with the Curacao Gaming Authority's Responsible Gaming Policy for Licensed Operators, Version 1.0 (17 April 2025) and the National Ordinance on Games of Chance (LOK).

For questions or clarifications regarding this policy, contact the Responsible Gaming Officer at [RG EMAIL].