

Responsible Gaming Internal Policy

Zerone B. V.

1. Purpose and Scope

This Responsible Gaming Internal Policy establishes the framework, principles, and procedures through which Zerone B. V. ensures that all gaming activities conducted under its Curaçao license are carried out responsibly, ethically, and in compliance with the standards set forth by the Curaçao Gaming Authority (CGA).

This policy applies to all departments, employees, contractors, and agents of Zerone B. V., including but not limited to Customer Support, Risk & Fraud, Compliance, CRM, Marketing, and VIP Management.

2. Regulatory Framework

This policy is aligned with:

- Curaçao Gaming Authority (CGA) Responsible Gaming Guidelines;
 - Curaçao AML/CFT and Player Protection Framework;
 - Applicable international standards for player protection and harm minimization;
 - Internal operational procedures and compliance manual of Zerone B. V..
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3. Policy Objectives

The objectives of this policy are to:

- Promote responsible gaming and prevent gambling-related harm;
 - Identify and manage risky or harmful gambling behaviors;
 - Protect minors and vulnerable persons from access to gambling;
 - Define internal roles, responsibilities, and escalation procedures;
 - Ensure consistent training and awareness among all staff;
 - Maintain adequate documentation for compliance verification and regulatory review.
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4. Roles and Responsibilities

4.1. Board of Directors / Senior Management

- Approve implementation of this policy.

- Ensure sufficient resources are allocated for responsible gaming initiatives.
- Review quarterly compliance and monitoring reports.

4.3. Compliance Department

- Responsible for oversight of responsible gaming operations.
- Ensures this policy is properly implemented across all departments.
- Monitors adherence to this policy.
- Maintains documentation of self-exclusion requests, interventions, and incidents.
- Coordinates with the Risk & Fraud and Customer Support teams on case reviews.
- Maintains liaison with the CGA on all responsible gaming matters.

4.4. Customer Support

- First point of contact for player requests related to self-exclusion, limits, or responsible gaming concerns.
- Must escalate potential risk cases or player distress to the Responsible Gaming Officer immediately.

4.5. Marketing and CRM

- Ensures all marketing communications adhere to responsible gaming principles.
- Must exclude self-excluded or high-risk players from promotional campaigns.

5. Operational Procedures and Controls

5.1. Player Identity and Age Verification

- All players undergo KYC verification prior to full account activation.
- Any player identified as underage is immediately suspended, and the incident is recorded and escalated to Compliance.

5.2. Player Protection Tools

The following tools are made available to all players:

- Deposit Limits (daily, weekly, monthly);
- Loss Limits (daily, weekly, monthly);
- Cooling Off;
- Self-Exclusion;
- Account History Reports (accessible on request).

All requests are documented and retained for a minimum of five (5) years.

5.3. Cooling Off Procedure:

- **Duration options:** 24 hours, 7 days, 1 month, 3 months
- **Marketing:** Players automatically opt-out from marketing communications during the Cooling-Off period
- **Account status:** Account remains active, but gambling functions are disabled; only funds are accessible for withdrawal
- **Reactivation:** Accounts automatically re-enable after the Cooling-Off period

5.4. Self-Exclusion Procedure

- **Duration options:** 1 year, 3 years, 5 years, 10 years, Lifetime
- **Scope:** Applies to all gambling activities
- **Marketing:** Complete opt-out from all communications
- **Account status:** Account is fully closed; player cannot log in
- **Reactivation:** Player must request account reactivation manually after the exclusion period; accounts do not reopen automatically
- **Additional safeguards:** System prevents duplicate accounts; any pending bets are refunded

6. Monitoring and Risk Indicators

6.1. Continuous Monitoring

The company employs behavioral monitoring systems and manual reviews to identify potential signs of problematic gambling, including:

- Sudden increases in deposit or wagering frequency;
- Multiple failed deposit attempts;
- Attempts to reverse withdrawals;
- Frequent requests for bonuses or credit;
- Extended playing sessions without breaks;
- Communication indicating distress, anxiety, or financial pressure.

6.2. Intervention Process

When indicators of risk are identified:

1. Case Review – The case is reviewed by the Risk and Compliance team.
 2. Customer Contact – The player may be contacted discreetly to discuss available control options.
 3. Action Plan – Account restrictions, self-exclusion, or further monitoring may be applied.
 4. Record Keeping – All interventions are logged in the internal compliance database.
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7. Data Management and Record Keeping

- All responsible gaming-related data (limits, exclusions, interventions) is stored securely and confidentially.
 - Access is restricted to authorized personnel only.
 - Records are retained for at least five (5) years and made available to the CGA upon request.
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8. Staff Training

- All employees receive **mandatory Responsible Gaming training** as part of their onboarding process.
 - Training includes identification of problem gambling behavior, communication protocols, escalation procedures, and compliance reporting.
 - Refresher training is conducted **annually** or when regulatory updates occur.
 - Training attendance and performance are documented and maintained by the Compliance department.
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9. Marketing and Advertising Compliance

- Marketing materials must not target minors, self-excluded players, or individuals displaying risky behavior.
 - Promotions must clearly communicate terms, conditions, and wagering requirements.
 - Marketing must never suggest gambling as a solution to financial or personal problems.
 - The Risk and Compliance team reviews and approves major campaigns for compliance.
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10. Auditing and Reporting

- Internal audits on responsible gaming controls are performed **semi-annually**.
 - Audit reports are reviewed by Senior Management and the Compliance Officer.
 - Significant findings, incidents, or breaches are documented and, if necessary, reported to the CGA.
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11. Policy Review and Approval

- This policy is reviewed **annually**, or upon significant operational or regulatory changes.
 - Updates are approved by the Compliance Officer and Senior Management.
 - A record of all revisions is maintained in the compliance documentation archive.
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Approved by:

Position: Compliance Officer

Date:

Version: 1.0