



Responsible Gaming Policy for Licensed Operators

Version 1.0

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1、 Definitions

U8 Group refers to the entity operating under the Curaçao Gambling Authority license and bound by this policy, has their office registered in Zuikertuintjeweg Z/N, Curacao.

Website refers to <https://fdhtuyui.com>

CGA refers to the Curaçao Gambling Authority.

Cooling-off Period refers to a predetermined period that a player can set, including hours, days, or months, during which the player is not allowed to place any form of bets.

Chance Game refers to a game in which one or more players compete for monetary or equivalent value, and the outcome is entirely determined by chance, or by a combination of chance and the player's insight or skill, but where the player cannot significantly affect the outcome. This includes sports betting and poker.

LOK refers to the Curaçao **National Gambling Act**.

Marketing, Promotions, and Advertising refers to all resources, information, and media used to promote **U8 Group's** domain name, brand, products, or services, including but not limited to print and other media advertisements, digital marketing, and social media campaigns.

Mandatory Requirements refers to the essential elements of responsible gambling policies that must be implemented by all operators including

U8 Group. These elements must reflect the operator's target market and player characteristics.

Minor refers to any individual under the age of 18.

Operator refers to an entity holding a Curaçao Gambling Authority B2C license (or an entity holding an "operating certificate" with an orange digital stamp), including **U8 Group**.

Self-Exclusion refers to the event in which a player voluntarily prohibits themselves from engaging in all or part of the online gambling activities with

U8 Group or other specific operator.

Vulnerable Groups are defined according to Section 1.1(h) of the LOK as including:

1. Individuals under the age of 18;
2. Individuals who may be or have become addicted to chance games due to a lack or insufficient control over their gambling behavior, and may cause harm to themselves or others as a result;

3. Individuals who are prohibited by force or voluntarily from participating in any chance game;
4. Individuals who have been declared bankrupt.

Problem Gambling refers to a situation where gambling behavior negatively impacts an individual's personal, family, or professional life, characterized by but not limited to: continued chasing of losses, concealing gambling behavior, and financial difficulties caused by gambling.

Risk Warning refers to mandatory warning information displayed by **U8 Group** and other operator(s) on the player's account interface or during the betting process, regarding the potential dangers of excessive gambling.

VIP Program refers to a special rewards mechanism offered by **U8 Group** and other operator(s) to high-value players, including but not limited to exclusive bonuses, increased betting limits, and personal account manager services.

2、 Policy Overview

The CGA is committed to promoting a safe, transparent, and fair gambling environment. **U8 Group fully adheres to this commitment.**

2.1 General Responsible Gambling Policy

Online gambling providers **including U8 Group** must integrate responsible gambling principles into their business models to ensure that gambling remains a form of entertainment and not a source of harm. This policy must include active measures and processes to protect vulnerable groups, promote responsible gambling, and prevent or mitigate problem gambling behaviors. This includes:

- A clear and easily accessible responsible gambling policy for players **provided by U8 Group**;
- Providing responsible gambling tools and informational resources for players **as implemented by U8 Group**;
- Establishing monitoring mechanisms to detect and address problem gambling behaviors **within U8 Group's operations**;

- • Compliance with all regulatory reporting and auditing obligations **by**

U8 Group.

U8 Group must upload their responsible gambling policy to the CGA

portal for evaluation. As a basic principle, **U8 Group** must not offer credit for betting purposes to players. Adherence to this responsible gambling policy is considered a requirement under the LOK, and failure to comply will be handled by the Curaçao Gambling Authority (CGA) according to its supervision and enforcement procedures.

2.2 High-Risk Business Models

The CGA requires operators **such as U8 Group** whose business models are wholly or partially classified as high-risk, including but not limited to skin betting, agent / intermediary accounts, cryptocurrency, or high-roller/VIP betting, to implement policies that appropriately address these high-risk business elements.

2.3 Non-Retail Models

This policy does not apply to non-retail gambling and betting, including but not limited to professional gamblers or gambling syndicates. General responsible gambling principles should be applied by **U8 Group** according to these types of business models when applicable.

3、 Mandatory Requirements

The following responsible gambling elements are mandatory for compliance with CGA gambling license operating requirements and must be implemented by **U8 Group**:

1. Age Verification (Section 5)
2. Accessibility of Information (Section 6)
3. Player Self-Assessment (Section 7)
4. Behavioral Tracking (Section 8)

5. Cooling-off Period (Section 9.1)
6. Self-Exclusion (Section 9.2)
7. Deposit Limits (Section 10.1)
8. Consumer Advertising and Marketing (Section 12)
9. Employee Training (Section 11)

This policy requires **U8 Group** operators to designate a responsible gambling officer within the organization. Before appointing a dedicated responsible gambling officer, the compliance officer (not related to anti-money laundering/terrorism financing) should be responsible for implementing and enforcing the responsible gambling policy at **U8 Group**.

The designated person must provide a report to **U8 Group's** management team at least every twelve (12) months regarding the effectiveness of the policy and related operational procedures. The report should include recommendations for any proposed operational or policy improvements. Any significant changes to the responsible gambling policy must be reported to the CGA by **U8 Group**.

4、 Implementation Timeline

Measure	Section	End Apr-25	End May-25	End Sep-25	End Mar-26	End Sep-26
Marketing & advertising cannot knowingly and deliberately target vulnerable persons	12	x				
Terms & Conditions should be visible and clear	6.3		x			
Responsible gambling policy: The document must be submitted to the CGA	2		x			
Management team to be aware of RG policy and its implementation	2		x			
Designate suitably qualified Responsible Gaming tasks to a person within the operator's online business	2		x			
Information Accessibility: Prominent display of information regarding responsible gambling and gambling addiction in English, as well as the language of the target market, including	6		x			

information on the website that gambling is prohibited for minors (under 18 years old)						
Gambling support referral: A prominent display of gambling treatment options in the target market, including local and/or international problem gambling support websites	6		x			
Marketing & promotions (other than vulnerable persons)	12			x		
Age verification: prohibition of gambling by self excluded individuals and minors on the website	5.1 5.2			x		
Self-exclusion option must be functional and meet all requirements (offering at least 1-year Self-exclusion period to players)	9.2			x		
No credit offering for wagering	2.1			x		
RG message on all advertising (mandatory)	12			x		
Behaviour tracking and procedures for player identification and interventions must be functional	8				x	
Safer gambling tools. Deposit limits	10.1				x	
RG training of staff with customer interaction (i.e. Customer support and VIP at a minimum and marketing)	11				x	
Cooling-off option must be available to players	9.1				x	
Player self-assessments must be available to players	7				x	
Exclusion by the operator must be functional	9.2					x
Other RG tools as necessary based on risk profile: for example, Reality Check, time limit.	13					x

5、 Prevention of Underage Gambling

5.1 Age Verification

According to Section 1.4(d) of the LOK, gambling license holders **including U8 Group** are prohibited from allowing minors to have access to or participate in chance games.

Therefore, **U8 Group** must implement strict age verification processes to ensure that all participants are of legal gambling age. During the account registration process, **U8 Group** must verify that the player is not a minor. This starts with a self-declaration, where the player must input their date of birth and confirm by checking a specified checkbox that they are over 18 years old, followed by additional checks by **U8**

Group to ensure sufficient certainty that the individual is not a minor.

If, at any time, despite the checks, **U8 Group** discovers that a player is a minor, **U8 Group** must immediately close the account. The civil legal implications of this action must be considered by **U8 Group**, which may include obligations to return all deposits and confiscate any winnings. **U8 Group** must clearly explain the reason for account closure to the minor.

In all cases, the submission and verification of age documentation by **U8 Group** must comply with the CGA's "Know Your Customer" and anti-money laundering policies. This must include checks of government-issued valid identification documents (such as a passport, national ID card, or driving license) at least when specific thresholds are met and, in any case, before the first withdrawal.

U8 Group may decide to use electronic verification systems, payment verification, third-party or government database checks, selfie verification, and other secondary verification methods. However, these methods cannot replace the requirement for government-issued documents.

U8 Group must keep records of all age verification processes and their outcomes. These records must be available for regulatory review.

6、 Player Information and Accessibility

6.1 Responsible Gambling Section

U8 Group must ensure that players have access at all times to a dedicated Responsible Gambling section ("RG Section").
The RG Section must:

- Be clearly identifiable and easily accessible on **U8 Group's platforms**;;
- Contain easily understandable information to help players make informed choices **about their gambling activities with U8 Group**;
- Include direct access to all relevant tools players can use to manage their gambling behavior **with U8 Group**, including but not limited to self-exclusion, cooling-off periods, limit setting, and other responsible gambling measures;
- Display information on how players can contact **U8 Group** regarding any responsible gambling issues via email or chat;
- The RG Section must be available in English and the language(s) of the target market as determined by **U8 Group**. In case of discrepancies, the English version always takes precedence.

6.2 Homepage Accessibility

- A clearly visible link to the RG Section must be provided on **U8 Group's** website or application homepage;
- Information on how players can contact **U8 Group** regarding any responsible gambling issues via email or chat must be displayed.

6.3 Inclusion in Terms and Conditions

- The RG Section must be clearly referenced and included in **U8 Group's** website's terms and conditions;
- The terms and conditions must be accessible with no more than one click from **U8 Group's** website homepage;
- Players must be informed by **U8 Group's** about the available responsible gambling tools, their functions, and how to use them.

6.4 Footer Information Requirements

The footer of **U8 Group's** gambling website or application homepage must include the following basic information:

- A clear visual indication that underage gambling is prohibited **by U8 Group**;
- The name and registered address of **U8 Group** as the license holder;
- The official license number issued by the Curaçao Gambling Authority to **U8 Group**;
- A statement confirming that **U8 Group's** activities are regulated by the Curaçao Gambling Authority;
- A link to **U8 Group's** RG Section;
- **U8 Group's** CGA digital stamp;
- • A direct link to one or more gambling addiction support resources, such as Gameare, Gamblers Anonymous, Gambleaware. In addition to international support resources, links to local support websites (if available) in the target market may also be provided **by U8 Group**.

6.5 Multilingual Support Requirements

- Core protective information must be available **on U8 Group's platforms** in the following languages:
 - English
 - The official language(s) of the target market **served by U8 Group**
 - Minority languages with a usage rate above 5% in the country **where U8 Group operates**
 - Live chat support provided by **U8 Group** must include at least three language options

6.6 Accessibility Features for Visually Impaired Users

- **U8 Group's** website must comply with the WCAG 2.1 AA standards:
 - Screen reader compatibility
 - Font magnification to 200% without distortion
 - High contrast mode toggle

7、 Self-Assessment

Players must be able to access a detailed betting and wagering history **with U8 Group** for at least the past six months (including transaction timestamps) from their player account, without affecting other legal requirements regarding retention periods. **U8 Group** may be required to provide transaction records for a longer period, which must be provided within 10 business days. If **U8 Group** can demonstrate that this timeframe is unreasonable in specific cases, the CGA may grant an extension at its discretion.

Players should be encouraged by **U8 Group** to regularly assess their gambling habits through self-assessment tools to determine whether their gambling remains within a healthy range. These tools **provided by**

U8 Group allow players to answer a series of questions designed to help identify potential problem gambling behaviors, enabling them to make informed decisions about their gambling activity.

Alternatively, **U8 Group** may also provide players with access to scientifically validated screening tools, which may include:
The CAGE Questionnaire for Gambling:
Encouraging players to honestly answer the following questions:

1. **C - Cut down:** Have you ever felt you should cut down on gambling **with U8 Group**?
2. **A - Annoyed:** Have people ever annoyed you by criticizing your gambling habits **with U8 Group**?
3. **G - Guilty:** Have you ever felt guilty about your gambling **with U8 Group**?
4. **E - Eye-opener:** Have you ever used an "eye-opener" in the morning to steady your nerves or recover from gambling losses **incurred with U8 Group**?

Interpretation of Results:

- 0 "Yes" answers: Low risk of gambling problems
- 1 "Yes" answer: Medium risk; may require further assessment
- 2 or more "Yes" answers: High risk; strong recommendation for further assessment and intervention

U8 Group must advise any player who recognizes problematic gambling behavior through self-assessment to explore available responsible gambling tools **provided by U8 Group**.

8、 Behavioral Tracking

Proactive monitoring **by U8 Group** can detect signs of problem gambling and establish clear intervention strategies for high-risk players to mitigate harm. Section 1.4(e) of the LOK prohibits **U8 Group** from offering participation in chance games to individuals reasonably presumed to be part of vulnerable groups. By comprehensively analyzing the relationship between the player and **U8 Group**, **U8 Group** can identify individuals at risk and take proactive measures to prevent gambling-related harm. Key monitoring factors are outlined in Section 8.1, but it should be noted that any single or individual factor alone does not necessarily classify a player as a potential gambling addict. Identifying problem gambling behavior may require multiple indicators to be present simultaneously and continuously in the player's activity with **U8 Group**.

Behavioral tracking is typically carried out by **U8 Group's** frontline staff (e.g., customer service representatives or VIP managers), as they are most likely to identify problem behaviors through patterns and direct interaction. **U8 Group's** responsible gambling policy itself should include structured procedures for flagging potential vulnerable gamblers, which can serve as triggers for more detailed behavioral analysis.

In addition to frontline staff, the CGA also allows **U8 Group** to use technological tools, including but not limited to gambling platform features, in-game tools, artificial intelligence (AI), or machine learning (ML).

8.1 Key Monitoring Factors for U8 Group

- Deposit and betting frequency - An unexplained increase in betting or game session patterns **with U8 Group**
- Repeated failed transactions due to insufficient funds **in U8 Group accounts**

- Withdrawal reversals - Multiple cancellations of withdrawal requests **from U8 Group**
- Unexplained long gaming session patterns **on U8 Group's platforms**
- Unreasonable increase in communication with **U8 Group's** customer service - Including bonus requests showing signs of agitation
- Frequent changes in responsible gambling tools **on U8 Group's platforms**- Such as setting or changing deposit or loss limits, or repeatedly using cooling-off periods
- Player maxing out credit cards **on U8 Group's platforms**
- Attempts to open multiple accounts with **U8 Group** to circumvent deposit or loss limits

8.2 Player Identification and Intervention Procedures for U8 Group

U8 Group must establish structured and documented procedures to address identified problem gambling indicators. These procedures must include the following components:

8.2.1 Player Profiling and Risk Assessment by U8 Group

- **U8 Group** must establish and maintain player profiles that include relevant data points for assessing individual risk levels;
- A risk-based approach must be used by **U8 Group** to determine appropriate levels of monitoring and intervention;

- All responsible gambling interactions - whether initiated by the player **U8 Group** or operator - must be recorded in **U8 Group's** Player Account Management (PAM) system, including the identified indicators and any actions taken.

8.2.2 Responsible Gambling Interventions by U8 Group

- Players identified as displaying risk behaviors must be informed by **U8 Group** about available responsible gambling tools, such as deposit limits, cooling-off periods, and self-exclusion options;
- **U8 Group** must follow clear escalation protocols when appropriate, which may include:
 - Imposing mandatory deposit limits on the player's account with **U8 Group**;
 - Temporarily suspending the account with **U8 Group** pending further evaluation;
 - Permanently excluding the player from **U8 Group's platforms** in cases of severe or persistent risk;
- In all cases, **U8 Group** must not use responsible gambling measures as an excuse to block or delay legitimate player withdrawals. Any abuse of protective interventions for financial gain will be treated as a violation of licensing conditions by **U8 Group**.

9、Cooling-Off Period and Self-Exclusion

U8 Group must implement and maintain effective processes and tools to allow players to manage their gambling behavior on **U8 Group's** platforms.

Both key mechanisms must be readily available to players through **U8 Group's** RG Section on the website or application:

- **Cooling-Off Period:** A short-term, customizable limitation on gambling activities **with U8 Group**;
- **Self-Exclusion:** A long-term, irreversible exclusion from all gambling activities under **U8 Group's** license.

U8 Group must not direct or influence players to choose one option over another and must not offer any interventions, bonuses, or guarantees.

Players must be clearly informed by **U8 Group** of the distinction between these options and their respective consequences.

	Cooling off	Self-exclusion
Wagering prohibited	Player selection -all or by vertical	No wagering,all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or all operator brands-as selected	All brands/domains under the operator's license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None

9.1 Cool-off Period

9.1.1 Overview

U8 Group must provide players with the option to activate a cool-off period during which their gambling activities are temporarily restricted. The options include:

1. Duration
2. Brand (including **U8 Group's** main domain and any mirror domains)
3. Vertical Domain
4. Marketing Opt-out

Duration and Marketing Opt-out categories are mandatory the **U8**

Group. The inclusion of Brand and Vertical Domain categories is at **U8 Group's** discretion.

- **Duration Only:** Restrict all betting activities within the selected time frame for **U8 Group's** specified brand.
- **Duration, Vertical Domain, and Brand:** Restrict activities within the selected vertical domain for **U8 Group's** chosen brand based on selection.

Players must choose their preferences in each category via checkboxes on **U8 Group's** platform. The checkboxes should not be pre-selected by **U8 Group**.

9.1.2 Duration Options

U8 Group must provide the following duration options:

- 24 hours

- 7 days
- 1 month
- 3 months

9.1.3 Vertical Options

- All gambling activities
- Restrict individual product verticals offered by **U8 Group**

(e.g., casino, fixed-odds betting, poker, and other P2P games). Casinos can be further subdivided into all games or only slots.

9.1.4 Brand Options

U8 Group must provide:

- Current brand (website and/or app)
- All brands operated by **U8 Group**

9.1.5 Marketing

- Opt-out.

9.1.6 Operations and Implementation

9.1.6.1 Timing

Restrictions must take effect immediately on **U8 Group's** platforms and be applied according to the player's choice.

U8 Group must not:

- Question the player's decision;
- Offer bonuses or promotions to encourage continued play;
- Delay or complicate the activation process.

U8 Group may add verification checks for a 1-month or 3-month cool-off period to confirm the player's decision to pause gambling during the selected cool-off period. However, such checks should only

be conducted online and expressed neutrally, for example: "You have chosen a 1-month cool-off period with **U8 Group**. Please confirm."

9.1.6.2 Player Accounts

- Player funds may still be used for withdrawals from **U8 Group**.
- The account remains active on **U8 Group's** platform but gambling functionality is disabled.

9.1.6.3 Marketing and Communication

- If the player opts out of marketing during the cool-off period, no marketing materials should be sent by **U8 Group**.
- No bonuses, free games, or incentives may be offered by **U8 Group** during the cool-off period.

9.1.7 Reactivation and Post-Cool-off Agreement

- The account must automatically reactivate on **U8 Group's** platform after the selected cool-off period ends;
- No further action is required by the player with **U8 Group**.

9.1.8 Cool-off Period Technical Implementation Standards

- **U8 Group's** System Architecture Requirements:
 - The cool-off functionality must be implemented via an independent module, physically isolated from **U8 Group's** core gambling system.

- Blockchain technology should be used by **U8 Group** to record the cool-off period operation logs (timestamps + digital signatures).
- Account status changes during the cool-off period must require multi-factor authentication at **U8 Group** (at least 2 admin authorizations).

9.1.9 Exceptional Situations Handling

- Cool-off conflict resolution mechanism:
 - Conflicts with unsettled bets: Automatically enter "read-only mode" on **U8 Group's** platform(allowing viewing but prohibiting further actions).
 - Conflicts with tournaments: Set up a dedicated isolated account at **U8 Group** for handling remaining events.
 - Conflicts with bonus validity: Automatically extend the bonus validity until the end of the cool-off period at **U8 Group**.

9.2 Self-exclusion

9.2.1 Overview

U8 Group must provide players with the option for self-exclusion from all gambling activities on **U8 Group**.

1. **Duration:** According to LOK Article 5.4(2), **U8 Group** must provide at least a 1-year long-term self-exclusion period.
2. **Brand:** All brands/domains operated under the **U8 Group's** license.
3. **Vertical Domain:** All gambling activities on **U8 Group's** platforms

4. **Marketing:** Automatic opt-out from **U8 Group's** communications
Players must select their preferred duration of self-exclusion via checkboxes on **U8 Group's** platform, while all other elements are automatic.

Regarding the self-exclusion process provided by **U8 Group**, players must be able to fully initiate and complete the process online without email communication or **U8 Group's** approval.

9.2.2 Duration Options

U8 Group must provide the following duration options:

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

9.2.3 Operations and Implementation

9.2.3.1 Timing

Restrictions must take effect immediately on **U8 Group's** platforms.

U8 Group must consider civil law implications, which may mean that any bets placed prior to the self-exclusion request but before it becomes effective must be voided, and funds must be refunded to the player by **U8 Group**.

U8 Group must not:

- Question the player's decision;
- Offer bonuses or promotions to encourage continued play;
- Delay or complicate the activation process.

U8 Group may implement a simple verification check to ensure the player knows they have chosen self-exclusion and understands the consequences. Verification should be conducted online and be brief and direct. Wording should be neutral, such as: "You have chosen to self-exclude from **U8 Group** for 5 years. Please confirm."

Player Account at U8 Group:

- The account is closed, and the player can no longer log in to **U8 Group's** platforms.
- **U8 Group** must have strong measures in place to reasonably identify and prevent the creation of new accounts by the self-excluded individual using different credentials.
- Civil law implications must be considered. This may include the cancellation of any bets placed before the self-exclusion but must comply with anti-money laundering/anti-terrorist financing regulations.
- Players must complete any ongoing tournaments (e.g., poker tournaments) at the time of self-exclusion from **U8 Group**.
- The player's contributions to cumulative jackpots through games played before self-exclusion are retained by **U8 Group**, but the player no longer has the right to participate in the jackpot after self-exclusion takes effect.

9.2.3.2 Marketing and Communication

- No direct marketing or advertisements should be sent by **U8 Group** to the player.

9.2.4 Reactivation and Post-Self-Exclusion Agreement

- After the self-exclusion period ends, the player must request account reactivation in writing (via email or chat). The written request can be prompted when the player attempts to log in after

the exclusion period ends or when the player proactively communicates through official customer service channels. Reactivation cannot be initiated by the operator's communication with the player. Self-exclusion initiated by the player is irreversible and non-retractable during the selected exclusion period.

- **U8 Group** must retain self-exclusion records according to the applicable retention period. Furthermore, where applicable and in compliance with relevant regulations, any payment methods known to have been used by the self-excluded player must be blocked during any exclusion period to prevent bypassing the restriction.

9.2.5 Self-exclusion Central Database

- **U8 Group** must have real-time access to the following systems:
 - CGA Central Exclusion Database (API synchronized every minute)
 - International Gambling Restriction Registry (at least daily synchronization)
 - Third-party payment blacklist (real-time query)

9.3 Operator-initiated Exclusion

U8 Group may exclude players as a high-risk intervention measure in the following situations:

- The player demonstrates problem gambling behavior;
- The player attempts or engages in criminal activities via the operator's platform;
- Operators must not exclude players solely based on their profit amounts.

Operator-initiated exclusions must be formally recorded and retained for at least five years. The CGA may request these records at any time.

10. Deposit Limits

Operators must provide players with the tools to control their gambling activities by setting deposit limits. Players can set these limits on a daily,

weekly, or monthly basis, allowing them to customize their restrictions based on personal gaming habits.

10.1 Deposit Limits

Players can set a limit on the total amount of deposits they can make within a specified period (daily, weekly, or monthly).

- Once the deposit limit is reached, players will be unable to deposit additional funds until the specified period resets.
- If there is an option to change the deposit limit after it has been set, any requests to increase the deposit limit will take effect immediately, while requests to lower the limit will only be implemented 24 hours later.
- Any bets placed but not yet settled before the deposit limit is set will not be affected by the limit.

Exceptions to Limits and Exclusions

Limits or exclusions may affect active bets, including but not limited to:

- Setting a time limit while the player is participating in a poker tournament;
- Setting a deposit limit or exclusion for bets placed on future events that are pending settlement.

In these cases, the restrictions must immediately apply, but active games or bets are excluded. Restrictions will apply once active games, relevant tournaments, bets, or events are completed. Players cannot place further bets before the event concludes — for example, players cannot join another tournament or participate in other games while a tournament is ongoing, or make any additional bets while a future event bet remains unsettled.

10.2 Limit Change Audit Trail

- All limit changes must be recorded:
 - Historical data before the change (betting patterns in the last 30 days);
 - Reason for the change (player-initiated/system recommendation/manual intervention);
 - Approval path (including customer service ID and decision timestamp).

11、 Training and Staff Readiness

Operators must train customer service and responsible gambling staff to handle player interactions professionally and effectively.

11.1 Certification Training System

- Mandatory Course Modules:
 - Crisis intervention skills (assessed through simulation scenarios);
 - Basic neuroscience (understanding addiction mechanisms);
 - Cross-cultural communication (addressing market-specific psychological traits).

11.2 Competency Assessment

- Implemented quarterly:
 - Blind testing (mystery shopper tests);
 - Recording analysis (random checks of customer service calls);
 - Emergency response drills (simulated handling of high-risk players).

12 、 Consumer Advertising and Marketing

Operators must not engage in irresponsible advertising.

- **Not targeting vulnerable groups:** Marketing, including visual content, must not directly target vulnerable populations.
- **Not portraying gambling as an investment:** Advertising must not promote gambling as a means to achieve financial success or solve financial problems.

- **Not distorting skills and chances:** Marketing must not imply that skills can affect the outcomes of purely chance-based games.
- **Not engaging in emotional manipulation:** Advertising must not portray gambling as an alternative to financial, emotional, or psychological well-being.
- **No underage individuals or portrayal of underage participation in gambling:** Marketing materials must not feature minors or imply they participate in gambling.
- **No explicit content:** Advertisements, information, or communications must not contain any explicit sexual innuendo or pornographic images.
- **Not promoting irrelevant harmful behaviors:** Gambling must not be associated with smoking, drug use, alcohol, or anything related to boosting attractiveness.
- **Bonus conditions:**
 - Bonuses and promotions must be clearly communicated with transparent terms and conditions.
 - Operators must not use bonuses to encourage excessive gambling.
- **Third-party involvement:**
 - Operators are responsible for the materials provided to affiliates, representatives, sponsors, or social media influencers, including wording and visuals, especially when their behavior/statements are paid advertisements.
 - Operators must ensure any third parties they work with are aware of and comply with their responsible gambling policies.
- **Responsible gambling information:** All advertising must include clear, visible responsible gambling information or slogans.

13 、 Enhanced Responsible Gambling Measures

Based on their business model's higher risk levels, operators may choose to implement enhanced responsible gambling measures. A higher risk level may stem from a business model inherently having a higher risk, as described in Section 2.2, or from an operator's evaluation showing a disproportionate number of players being assessed for exclusion/cool-off periods, making them high-risk.

13.1 Internet Filtering Tools

To further prevent underage gambling, operators are encouraged to remind adults to take precautions when sharing devices with minors (e.g., protecting usernames, passwords, and payment details). Additionally, operators may consider linking to third-party software to help limit access to gambling sites. While many options exist worldwide, the following third-party tools (some paid, some free) are examples of tools that can block gambling websites:

- BetBlocker – betblocker.org
- GamBlock – gamblock.com
- Gamban – gamban.com

13.2 Direct Player Interaction

- Operators may use automated or manual pop-up notifications to address concerning behaviors. These notifications must include a link to trained responsible gambling professionals for player contact.
- When players exhibit reasonable behaviors that may indicate they are vulnerable, operators must initiate direct contact. This communication should encourage the player to review the responsible gambling area and consider using available tools and support services.

13.3 Other Limits

Depending on the operator's target players and/or market, additional limits may be considered, such as loss limits, time limits, or bet limits.

13.4 Reality Checks

There are various reality check measures that, if used, can be implemented in ways that do not interfere with the user experience. However, if these measures are used, they must be fit for purpose.

These measures include, but are not limited to:

1. A real-time session timer that is always visible during player login;
2. A real-time clock displaying the player's local time zone;
3. Regular pop-ups reminding players of their session duration or providing warnings;
4. Player-activated reality checks.

Players can choose to set custom reality check reminders at specific time intervals. When triggered, the player must confirm that they have read the message before continuing to play and can choose to either end the session or continue.

Custom reality checks must temporarily pause the game and require the player to confirm that they have read the message before resuming play.

Custom messages may include:

- A clear display of how long the player has been playing;
- Displaying the player's profit or loss during that period.

13.5 Special Privacy Protection Terms

- **Data usage restrictions:**
 - Behavioral data must not be used for personalized marketing.
 - Risk assessment results should be retained for a maximum of 2 years.
 - Players have the right to request the deletion of non-essential data.