

RESPONSIBLE GAMING POLICY

1. PRINCIPLE AND OBJECTIVE

Our company is dedicated to fostering a safe, transparent, and fair gaming environment in full compliance with the National Ordinance on Games of Chance (LOK) and the regulatory frameworks enforced by the Curaçao Gaming Authority (CGA). We view gambling strictly as a form of entertainment and actively implement measures to mitigate problem gambling, protect vulnerable persons, prevent underage access, and ensure that player spending aligns with their legitimate financial means.

2. CUSTOMER-LED RESPONSIBLE GAMING TOOLS

To empower players to manage their gambling habits, our platform provides built-in, easily accessible self-protection mechanisms. Players can configure these restrictions directly from their account settings panel:

- **Deposit Limits:** Players can establish strict financial boundaries by setting caps on the total amount they can deposit. These limits can be tailored across three distinct intervals:
 - **Daily Limit**
 - **Weekly Limit**
 - **Monthly Limit**
- **Limit Adjustments and Cool-Off Periods:**
 - **Decreasing a Limit:** Any request to lower an active deposit limit takes effect **instantly** to ensure immediate player protection.
 - **Increasing a Limit:** Any request to increase or completely remove a deposit limit is subject to a mandatory **24-hour cool-off period**. The limit remains restricted until this reflection window expires and the player confirms the change.
- **Time-Out Functionality (Short-Term Breaks):** If a player needs a short-term break from gambling, they can temporarily suspend their account access directly from the settings interface. We support the following predefined time-out durations:
 - **24 Hours**
 - **7 Days**
 - **30 Days**
- During an active time-out, the account remains locked, and the player cannot log in, deposit, or place wagers.

3. FINANCIAL THRESHOLDS: SOURCE OF FUNDS (SOF) & SOURCE OF WEALTH (SOW)

To prevent financial distress and identify potential problem gambling early, our compliance infrastructure links responsible gaming monitoring with strict anti-money laundering (AML) and financial vulnerability checks:

- **Standard Identity Verification (CDD) Trigger:** In strict accordance with Curaçao anti-money laundering and Customer Due Diligence (CDD) mandates, identity verification is fully executed before processing any individual or linked transactions (deposits or withdrawals) reaching NAF 4,000 (approx. €2,000).
- **Source of Funds (SOF) Trigger:** A formal SOF check is automatically triggered when a player reaches a cumulative deposit threshold of €10,000 within a rolling 12-month period, or earlier if automated velocity alerts indicate structural spending anomalies.
- **Source of Wealth (SOW) Trigger:** Full Enhanced Due Diligence (EDD) and SOW verifications are strictly mandatory when a player's cumulative deposits reach €25,000, or immediately upon a high-risk indicator (such as a PEP match, high-volume cryptocurrency usage from unverified wallets, or requests for extreme deposit limit increases).
- **Verification Requirements:** When a financial trigger is met, the player's account is restricted, and they must provide valid documentary evidence to prove their income or wealth origin before further high-volume activity is permitted. Acceptable documentation includes:
 - Recent payslips, employment contracts, or company tax filings.
 - Bank statements clearly showing regular legitimate income or savings.
 - Official proof of property sales, inheritance, or investment dividends.
- **Responsible Gaming Assessment:** The compliance team reviews these documents not only for AML verification but also to ensure the player's gambling expenditures are proportionate to their discretionary income, preventing severe financial hardship.

4. SELF-EXCLUSION PROTOCOLS

For players facing more severe gambling challenges, we offer a formal self-exclusion program in line with CGA mandates.

- Players can request formal long-term self-exclusion by contacting our Customer Support team directly.
- Upon receiving a self-exclusion request, the compliance team immediately deactivates the account, revokes access to all games, and blocks the player from creating duplicate accounts.
- We ensure that self-excluded individuals are systematically purged from all marketing and promotional distribution lists.

5. PROTECTION OF MINORS & AGE VERIFICATION

In accordance with Curaçao law, individuals under the age of 18 are strictly prohibited from participating in any games of chance on our platform.

- **KYC Verification:** We enforce rigorous electronic and manual Know Your Customer (KYC) procedures. Every player must provide valid, government-issued identification (passport, national ID card, or driver's license) to verify their date of birth.
- **Parental Controls:** We provide clear links and recommendations on our website for filtering software (such as Net Nanny or CyberSitter) to help parents prevent minors from accessing gambling content within their households.

6. STAFF TRAINING AND BEHAVIOR TRACKING

- **Employee Awareness:** All customer-facing employees and compliance team members undergo mandatory training to recognize behavioral indicators of problem gambling, such as chase-betting, structural spending spikes, or frantic session durations.
- **Intervention:** When the compliance team identifies at-risk behavior through manual oversight, SOF/SOW checks, or internal alerts, they proactively contact the player to offer responsible gaming resources or suggest appropriate account restrictions.

7. RECOURSE AND EXTERNAL SUPPORT

To ensure professional help is accessible when needed, our support agents are trained to provide direct guidance to players showing signs of problem gambling or requesting account closure:

- Whenever a player requests an account closure due to gambling concerns, or if our compliance team flags an at-risk user, our support representatives proactively deliver contact details and direct resources for recognized independent support organizations via **Live Chat** and **Email**.
- The standard resource toolkit provided to players includes direct contact paths to international help organizations specializing in gambling addiction support, such as **Gamblers Anonymous** and **Gambling Therapy**.