

Twino Trading

Safer Gambling and Customer Interaction Policy

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Revision History

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Purpose and scope

Twino Trading N.V. (hereinafter the “**Company**”) aims is to ensure that gambling is conducted in a fair and open way, to prevent gambling from being a source of crime or disorder, being associated with crime or disorder or being used to support crime. All operations of the company are to be carried out, in accordance with these aims, in a socially responsible manner and in full compliance with applicable legislation, industry standards, and other requirements laid down by the **Curacao Gaming Control Board** (“**CGCB**” or the “**Commission**”).

The main goal of this “*Responsible Gambling and Customer Interaction Policy*” (the “**Policy**”) is to guide all Company employees that work directly with customers within their tasks as Customer Support Agents or otherwise supervise the work of such, in identifying customers who might have gambling issues and in the proper handling of customers with gambling issues, as well as to ensure protection for other at-risk vulnerable persons.

The Company does not allow anyone under 18 years of age to play on their website(s).
Age verification is conducted in accordance with the AML guidelines of the CGA.

As a general principle no credit shall be offered to customers for the purpose of wagering.

The Company ensures that players can easily access responsible gaming information by:

- Visible Links: Our homepage displays a link to the responsible gaming policy, tools, and contacts. These links are also included in the footer of the homepage on our website
- Terms and Conditions: Clear references to our terms and conditions, including the prohibition of underage gambling, are provided. The terms and conditions are easily accessible and written in plain language;
- Responsible Gaming Organizations: Links to organizations that offer support for gambling addiction are available. These include local and international organizations, as per this policy.
- The company will retain records of all age verification process and their outcomes according to the Company’s record keeping obligations and for regulatory review by the CGA.

The website of the Company will displays the direct links to:

<https://gamblingtherapy.org/information/where-can-i-get-help/>

and /or <https://www.gamcare.org.uk/self-help/links-to-other-support-agencies/international-supportcontacts/>

and/or <https://www.gambleaware.org>

as well as to specific names of organizations offering treatment options in case these are available in the target market of the Company. These links will be readily available on the footer of the website.

Section I. Safer gambling tools

The following tools are made available to customers, in order to allow them to control their gambling and ensure that our services are provided and used in a safe and socially responsible manner. Such tools are provided in the manner prescribed and in accordance with the requirements and parameters set down by applicable legislation and the Commission.

1. Deposit limits

- 1.1. We offer customers the opportunity to set limits on the amount a customer deposits into their account over a particular duration. Customers may choose to set deposit limits to their account on a (a) daily, (b) weekly or (c) monthly basis. The option for setting deposit limits is available: immediately following registration of the customer and via a link on the website homepage.
- 1.2. An update of these limits can be requested by the player at any time. When a player requests a decrease in their deposit limits, this decrease goes into effect immediately. When a player requests an increase of the set deposit limit, they are given a 24 (twenty-four) hour “cool-off” period, after which they need to confirm that they are in control of their gambling.

2. Time out

- 2.1. We offer customers the opportunity to take a break from playing by temporarily locking their account for a predefined period of time (“**Time out**”), which period may be of (a) 24 (twenty-four) hours, (b) one week, (c) one month, or (d) any other any other reasonable period of up to 6 months which the customer may request by contacting our Customer Support. During the time out period selected, the customer will not be able to regain access to their account. After the requested duration has passed the account is re-opened automatically upon login.
- 2.2. The Time out options for the predefined periods in cases (a) to (c) are available via a link available on the homepage. The customer may also contact our Customer Support to request any other Time out period of up to 6 (six) months. Where a customer contacts our Customer Support requesting Time out the responsible support agent must provide or make available sufficient information about what the consequences of “time-out” are and advise the customer that they will not be able to use their account until after the selected period has passed.

3. Reality check

- 3.1. We offer customers the opportunity to remind themselves of the amount of time they’ve spent on gaming by setting up a reminder to appear at selected intervals throughout their gaming, the option for which available via a link on the website homepage (“**Reality check**”). These reminders may be set at intervals of (a) 30 (thirty) minutes, (b) 1 (one) hour, and (c) 1 (one) hour and 30 (thirty) minutes and continue to appear at the selected time intervals until the customer’s gaming session ends or the customer exits their account.

4. Self-exclusion

- 4.1 Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. The Company offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want our assistance to help them stop.

The self-exclusion request shall be applicable:

- A. To all brands/domains operated under the Company;
- B. All gambling activities related to one Casino vertical available on the Company's domain. If such option is provided by the Company to the Customer, as otherwise the self-exclusion under A will be provided for all gambling activities of the Company.
- C. All advertisement activities of the Company. An automatic opt-out will be triggered when self-exclusion is activated

The duration of the self-exclusion period must be at least 1 year. The Customer shall be able to set the duration for 3 years, 5 years, 10 years or a lifetime.

The customer should be able to set their preference ~~of~~ for the duration of the self-exclusion period online, without requiring email communication or prior approval from the Company. Once this is set, all exclusions related to brands/domains, vertical gambling activities and advertisement activities automatically applies immediately.

Any wagering that takes place following the self-exclusion request and prior to it being into effect will be voided and the funds returned to the customer.

The Company should not question a customer's decision regarding self-exclusion in general, not will the Company offer bonuses to the customer to encourage participation, or delay/complicate the self-exclusion activation process.

If a self-exclusion is applied, the following actions should be in place:

- The customer's account is closed. The customer can no longer log in.
- The customer must complete any tournaments that is in-running at the time of the self-exclusion.
- Ante-posts bets will be voided and refunded subject to AML/CFT regulations.¹
- Contributions to progressive jackpots that were made by the customer through gameplay prior to the self-exclusion request remain, but the customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect.
- No Advertisement activities shall be conducted towards the customer.
- Any payment method used by the customer will be blocked by the Company for future use during the term of the self-exclusion period.

The Company will implement measures to prevent self-excluded customers from creating new customer's account under different credentials.

The Company will retain records of self-excluded requests by customers according to the applicable record keeping requirements.

Reactivation of customer's account after self-exclusion

After the self-exclusion period ends, the customer must request in writing (by email or chat) the unblocking of the account. The reactivation of the account cannot be instigated by the Company by re-commencing communications with the Customer.

¹ Ante post bet bets are those placed in advance of the opening of betting market for that event

Company initiated self-exclusion

The Company may exclude a Customer from gaming activities as a high-risk intervention measure if:

- The Customer displays problematic (gaming) behaviour
- The Customer attempts or engages in criminal activities through the Company's platform.

The Company will not exclude Customers solely on the basis of the amount of their winnings.

Section II. Identifying customers at risk of experiencing harm

1. Indicators of harm

1.1. The Company uses a range of indicators in order to identify harm or potential harm associated with gambling and has in place procedures and actions, to be carried out by the relevant departments, aimed at ensuring that all vulnerable customers are proactively and diligently identified. As a minimum, the following are taken into account to identify at-risk customers:

- (i) Customer spend indicators – these include amounts spent by the customer, taking into account affordability;
- (ii) Patterns of spend indicators – these include high amounts of spend over a short period of time;
- (iii) Time spent indicators – these include the amount of time spent gambling and the time during which gambling took place (i.e. overnight gambling);
- (iv) Gambling behavior indicators – these include chasing losses, high staking following a big win, etc.;
- (v) Customer-led contact – these include information or hints from customers, frequent complaints about not winning, requests for bonuses following losses, or talking about the negative impacts of their gambling, etc.;
- (vi) Use of gambling management tools – such as changing deposit limits, previous selfexclusions, frequent or repeated use of the time out facility, etc.;
- (vii) Account indicators – such as failed deposits, multiple payment methods, pre-loaded cards, and e-wallets;

1.2. The above indicators are used to identify at-risk customers in a timely manner, in order to prevent future harm, through assigning appropriate risks levels to customer accounts, the use of automatic triggers to detect indicators as early as possible, ongoing monitoring and re-evaluation of customer accounts, and immediate and appropriate escalation of customer-led contact.

2. Customer risk levels

2.1. All customer accounts are assigned the following risk levels on the basis indicators displayed, either automatically when a customer account has met an automatic threshold or trigger, or manually by the Compliance Team, when one or more indicators are notices in the process of account monitoring or following the escalation of a customer-led contact indicator by the Customer Support agents:

- (i) No risk – there are no indicators that the customer may be at risk of experiencing gambling related harm;

- (ii) Low risk – there are some indicators that the customer may be at risk of experiencing gambling related harm and the customer account should be monitored for further developments and action taken, if necessary;
- (iii) Medium risk - there are a number of relatively strong indicators that the customer may be at risk of experiencing gambling related harm and immediate action should be taken to minimize harm;
- (iv) High risk - there are a number of sufficiently strong indicators that the customer may be at risk of experiencing gambling related harm and immediate action should be taken to minimize harm;

3. Automated triggers

- 3.1. The Company used automated triggers as an initial step towards identifying at risk customers and signaling the need for further monitoring and timely action as early on as possible, as well as employing automated action to prevent immediate further harm. (**Annex A**). On the basis of these, customer accounts may be automatically assigned a risk rating of “Low risk”, “Medium risk” or “High risk” and/or automatic action may be taken with respect to such accounts.

4. Account monitoring

- 4.1. All customer accounts that have triggered an automated response are subject to further review by the Compliance Team. The Compliance Team reviews all customer activity, reassigns risk levels where it is determined that the automated response has not appropriately categorized customer account(s), decides on and initiates further action on the basis of indicators observed.
- 4.2. The Compliance Team monitors all customer activity for indicators of harm on a daily basis through the backend system of the Company, taking into account risk levels already assigned and customer segments targeted for review, in order to ensure that indicators of harm are manually flagged early on, in spite of not having reached an automated trigger point.

5. Customer-led contact & vulnerability

- 5.1. **Customer-led contact.** Through their interactions with Customer Support, customers may give a number of indicators that suggest they may be at risk of experiencing gambling related harm or have problems controlling their gambling. These may include:

- (i) Mentioning the negative impacts of their gambling - for example:
 - Having financial problems, losing more money than they win or more than they can afford;
 - Having family/personal problems because of their gambling;
 - Losing their job, developing health problems, etc. because of their gambling;
- (ii) Expressing the wish to stop gambling - for example
 - Wanting to close their account or take a break from gambling;
 - Saying they gamble too much or they spend too much money on gambling;
 - Saying they can't stop gambling, they're desperate to spend, etc.;
- (iii) Frequent complaints and aggressive behavior - for example:
 - Frequent complaints about game fairness, bonuses, etc.;
 - Complaints about playing long but not reaching any big winnings;

- Being aggressive to agents when reasonable explanations are given;
- Frequent requests for bonuses (especially after losses);

5.2. Indicators of vulnerability. Some customers may be more vulnerable to experiencing gambling related harm due to their personal circumstances or otherwise. Often times through their contact with Customer Support, a customer may mention life events or demonstrate behavior indicating that the customer is, due to their personal or other circumstances, more vulnerable to experiencing gambling related harm. These circumstances may be temporary or permanent and include factors related to:

- (i) Mental and physical health - If an individual is experiencing poor physical or mental health, physical or cognitive impairment, suffering side effects from a brain injury, taking medication which may increase risk taking, as an addiction, etc. For example, a customer may mention their ill health during a conversation with customer service.
- (ii) Access and capabilities - If an individual has difficulty accessing information because of poor literacy or numeracy skills, knowledge, dyslexia; or if an individual has a higher than standard level of trust or high appetite for risk. For example, communication with the customer indicates lower than expected knowledge or understanding.
- (iii) Life events - If the individual is experiencing financial difficulties, is homeless, is suffering from domestic or financial abuse, has caring responsibilities, experiences a life change or sudden change in circumstances such as divorce or bereavement, job loss. For example, a customer may discuss a significant recent bereavement and the impact this is having on their gambling on chat.

5.3. Action and escalation. Where the responsible Customer Support agent suspects that a customer may be at risk of harm, the agent immediately:

- (i) Confirms whether the customer is in immediate danger of harm by inquiring about the customer's state through questions such as:
 - "Do you consider gambling is still an enjoyable and affordable hobby for you?"
 - "Do you think that gambling is affecting you negatively?"
 - "Are you in control of the level of your gambling?"
- (ii) Where the customer is unsure, encourages the customer to consider factors that may be of help in determining whether the customer is experiencing or may experience harm as a result of their gambling, such as:
 - "Do you believe your financial situation or personal relationships may have deteriorated as a result of gambling?"
 - "Have you ever found yourself wishing to stop gambling altogether but being unable to?"
 - "Have you ever found yourself gambling while at your place of business and being unable to focus on your work?"
 - "Do you believe that you're spending less and less time with your loved ones as a result of gambling?"
 - "Have you ever found yourself hiding the fact that you gamble from your spouse, your friends, or other family members?"
- (iii) If the customer confirms they are in control of their gambling levels and their gambling has not affected them negatively, escalates the case to the Compliance Team for further assessment, including appropriate categorization of the escalation as a safer gambling interaction, all relevant details of the interaction and the customer account to which it pertains, and a reference number to the interaction available for further review;

- (iv) If the customer confirms they are not in control of their gambling, their gambling is affecting the negatively an/or they wish to stop gambling, informs the customer on the account closure and the reason for the closure considering the Company's obligations, encourages the customer to seek help and support by directing them to appropriate resources, closes the customer account immediately thereafter in accordance with Safer Gambling Account Closure Procedure, and escalates the case to the Compliance Team;

5.4. **Risk of suicide.** When a Customer Support Agent suspects that, based on any of the above indicators of vulnerability or otherwise, the customer may be at risk of suicide, the Agent:

- (i) Follows guidelines, training materials and resources to provide basic emotional support;
- (ii) Inquires the customer, if appropriate, whether they are experiencing thoughts of suicide;
- (iii) Directs them to and encourages them to contact suicide prevention helplines and offers to call on their behalf if necessary;
- (iv) immediately escalates the case to the Compliance Team for further action;

Section III. Actions and approaches

1. Early action

- 1.1. At lower levels of indicators of harm, where the customer is considered "low risk", early generic or tailored action may be undertaken with respect to the customer, in order to prevent or minimize future harm.
- 1.2. All customer-facing staff are instructed and trained to always include safer gambling messaging in their interactions with customers, by encouraging them to play responsibly and make use of the gambling management tools available as a part of early generic action.
- 1.3. The Compliance Team may, where it is considered necessary or beneficial to prevent or minimize future harm, contact and further encourage the customer to make use of the safer gambling tools available, share helpful resources and safer gambling messaging, or share information on customer spend and behavior.

2. Medium action

- 2.1. Where the customer is considered "medium risk" and/or earlier stages of interaction have not had the impact required, medium action may be undertaken with respect to the customer, in order to prevent or minimize the risk of the customer experiencing immediate or future harm.
- 2.2. **Eligibility for promotions and bonuses.** A customer may be prevented from the taking up of new bonuses and promotions. This may be done:
 - (i) by the Compliance Team, on the basis of customer account assessment, or
 - (ii) automatically, when the customer account is classified as "medium risk" or higher, or
 - (iii) automatically, when an automatic affordability check shows an overall low affordability score;

Where a customer is marked as marked as not eligible for promotions and bonuses while the customer has an active bonus on their account, the Compliance Team decides, based on the overall risk of harm and in the interest of fairness, whether to allow the customer to continue wagering the bonus claimed or to award the customer a proportion of the winnings accumulated.

2.3. Deposit limits. The Compliance Team may set daily, weekly, monthly, or yearly deposit limits in an amount of:

- (i) where the customer has provided a source of funds document and that document has been considered sufficient and true, a percentage of the customer's monthly net income as attested by the document, taking into account all other evidence available and considering national and/or regional statistics with regard to personal and/or household expenditure and budget;
- (ii) where the customer has not provided a source-of-funds documents upon request or until such document is provided, a percentage of the minimum of the monthly income calculated on the basis of current National Minimum Wage and National Living Wage figures;

2.4. Customer interaction and signposting. In order to minimize harm, evaluate the effectiveness of previous action or interactions, re-assess a customer's risks level and tailor further action appropriately, the Compliance Team and/or Customer Support agents carry out customer interactions (**Annex B**) and:

- (i) inquire about their state and gambling habits of the customer;
- (ii) ask the customer to confirm they are in control of their gambling and are not experiencing harm;
- (iii) encourage the customer to think on their gambling behavior and the effects it may have on their personal, professional, or financial situation;
- (iv) encourage the customer to use the safer gambling tools available to them;
- (v) direct the customer to safer gambling resources for help and support;

3. Strong action

3.1. Where the customer is considered "high risk" and/or earlier stages of interaction have not had the impact required, strong action may be undertaken, either following medium action or as the immediate next step in cases where that is appropriate, rather than increasing action gradually.

3.2. Strong action may include any of the actions that may be carried out where the customer is considered "medium risk", separately or cumulatively, or may include the ramping up on actions already undertake, such as decreasing the deposit limits already set on behalf of the customer, carrying out additional customer interactions, using diverse mediums of interaction, etc.

3.3. Temporary account suspension. A customer account may be temporarily suspended where there are strong indicators that the customer may be at risk of experiencing gambling related harm and where allowing them to continue gambling until such suspicion is partially or fully discarded may cause significant harm to the customer. In such cases, the Compliance Team may contact

the customer to request a source of funds document, in order to confirm that the customer is not gambling with money they do not have and experiencing financial harm as a result, or to inquire further about the customer's behavior and confirm that they are in control of their gambling. Depending on the nature of the interaction and the specifics of the customer account, the account may be temporarily suspended as a preventive measure until a response is received and/or the requested document is provided.

3.4. Account closure. Where concern persists and previous actions have not resulted in sufficient protections in place or behavior change by the customer, a customer's account may be closed:

- (i) by decision of the Compliance Team, where it is determined that allowing them to continue gambling is likely to cause significant harm to the customer, or

- (ii) by the responsible Customer Support agent, where the customer has displayed indicators of compulsive behavior or vulnerability and, upon being inquired about their mind state and behavior, has confirmed that they have gambling problems and/or that they wish to stop gambling;

Where the decision to close a customer account is made, the customer is immediately informed about the account closure and the reasons behind it, taking into account the Company's Safer Gambling policies and obligations, directed to safer gambling resources, and encouraged to seek further help and support. The remaining balance on the customer's account is refunded in accordance with and within the timeframes in our User Agreement and Withdrawal Policy.

Section IV. Evaluation, learning and development

1. Training and resources

- 1.1. All staff members that directly or indirectly interact with customers receive induction training on Safer Gambling and Customer Interaction and refresher training every 6 (six) months. The Compliance Team organizes induction and refresher trainings, distributes training materials and tests, maintains a list of staff relevant members receiving induction and refresher trainings, and ensures that all training materials and content is up to date and in line with any applicable regulatory instrument(s) and other guidelines and documents, including such published by the Commission.
- 1.2. All Customer Support agents undergo an eLearning course on Suicide Awareness in the Gambling Industry. The Customer Operations Management ensures that all newly onboarded Customer Support Agents are instructed to self-enroll and complete the course. The Compliance Team oversees the completion of the course and maintains a list of agents having completed the course.
- 1.3. The responsible Learning & Development Specialists maintain and make available to customerfacing staff knowledge bases with instruction manuals on all applicable procedures and courses of action, and other helpful resources. The Learning & Development Specialist update the knowledge bases on the instruction of the Compliance Team, which regularly monitors the content of the resources made available and ensures it is up to date and in line with any applicable regulatory instrument(s) and other guidelines and documents, including such published by the Commission.

2. Record keeping and evaluation of interactions

- 2.1. The Compliance Team records all customer interactions and maintains a Customer Interaction Report, which includes, as a minimum, information on:
 - (i) the behavior that prompted the interaction, such as thresholds, triggers and indicators hit;
 - (ii) the type of action or interaction that took place as a result;
 - (iii) review and outcome of the action/interaction;
 - (iv) any additional follow-ups with the customers and feedback received;
 - (v) final decision taken with respect to the account; (vi) analysis of the effectiveness of the interaction.

- 2.2. The Compliance Team record and evaluates the outcome of each stage of interaction, tailors and directs future action in accordance with previous interactions, and identifies good practices applicable with regard to all customers and/or particular segments of customers.
- 2.3. The Compliance Team makes available to the customer-facing staff records of previous interactions and actions taken with respect to a customer account for consideration and assessment of subsequent interactions.
- 2.4. The Compliance Team collects data on the number of interactions and number of customers interacted for the purpose of filing regulatory returns and ensures that rate of interaction in line with problem gambling rate for online gaming on slots and casino is maintained.

3. Quality Assurance (QA)

- 3.1. The responsible Learning and Development specialist(s) conduct Quality Assurance (QA) evaluations of all interactions that have been escalated to the Compliance Team as a result of a relevant risk indicator, using concrete measures and indicators that ensure that all indicators of harm have been appropriately identified, the appropriate course of action has been undertaken, and all applicable Escalation and Account Closure Procedures have been strictly followed.
- 3.2. The responsible Learning and Development specialist(s) conduct analyze the customer's response to the interaction, for the purpose of aiding the assessment of the overall interaction approach undertaken by the Company, on the basis of categorizations for measuring the effectiveness of interactions (on the basis of customer response only), as developed by the Compliance Team (**Annex C**).
- 3.3. The Learning and Development Team reports to the Compliance Team: (i) immediately following the assessment, each interaction that has not been appropriately escalated to the Compliance Team as a CG Interaction on the basis of the established procedures and policies, accompanied by the respective QA report, (ii) immediately following the assessment, each interaction that has otherwise not been appropriately handled by the agent on the basis of the established procedures and policies, accompanied by the respective QA report.
- 3.4. The Learning and Development Team may make written recommendations to the Compliance Team on the effectiveness of the Company's overall interaction approach, to the extent that the above scope of the QA evaluation is concerned on a quarterly basis, prior to the adoption of the Safer Gambling and Customer Interaction Framework Assessment.

4. Framework Assessment

- 4.1. The Head of Compliance prepares a Safer Gambling and Customer Interaction Framework Assessment on a bi-annual basis, (i) by the end December and (ii) by the end of June of the respective year.
- 4.2. The Head of Compliance consults relevant stakeholders, organizes consultation, receives recommendations, requests estimated dates of implementation, and presents a final version of the Assessment for approval.
- 4.3. The Assessment, as a minimum:
 - (i) Evaluates the Company's current approach to safer gambling and customer interaction in light of the Company's regulatory obligations;

- (ii) Evaluates the effectiveness of the current approach to safer gambling and customer interaction in light of the impact and results identified;
- (iii) Provide recommendations for further improvement, taking into account any changes in the Company's regulatory obligations, the need for industry learning, staff development needs, best practices, and other relevant factors;

4.4. The Assessment may be approved in its entirety or returned for further review and amendments. Recommendations are considered accepted upon the approval of the present Assessment, and are implemented as soon as reasonable, subject to technical or other limitations and the following of adopted procedures.

Section V. Roles and responsibilities

1. The Customer Support Agents:

- (i) Follow strictly all applicable procedures and policies on Safer Gambling and Customer Interaction;
- (ii) Are familiar with the Company's regulatory obligations and the functionalities offered to customers, including safer gambling tools;
- (iii) Regularly consult resources and guidelines made available to them;
- (iv) Undergo mandatory induction, refresher, and specialized trainings;
- (v) Consult and take into account all relevant information on a customer's account and interaction history prior to, during and after interacting with a customer;

2. The Learning and Development Team:

- (i) Maintains, makes available and updates on the instructions of the Compliance Team knowledge bases and resources for customer-facing staff;
- (ii) Conducts QA evaluations of all relevant interactions on the basis of parameters prescribed;
- (iii) Reports to the Compliance Team instances of inappropriately handled and/or escalated interactions;
- (iv) Makes available reports and scorecards of all Safer Gambling interactions evaluated;
- (v) Makes recommendations, if any, to the effectiveness of the Company's overall interaction approach;

3. The Customer Operations Management:

- (i) Organizes or instructs, as the case may be, the completion specialized trainings and access to learning materials for members of the Customer Support and/or Learning and Development Teams;
- (ii) Engages in consultations on recommendations;
- (iii) Oversees the proper carrying out of the responsibilities of the Customer Support and Learning and Development Teams;

4. The Compliance Team:

- (i) Monitors customer activity to identify indicators of harm;
- (ii) Assigns or re-assigns risk levels to customer accounts;

- (iii) Takes or instructs timely and appropriate action to minimize harm; (iv) Keeps records of evaluates customer interactions and actions;
- (v) Organizes and maintains lists on induction and refresher trainings;
- (vi) Monitors the completion and maintains lists on specialized trainings;
- (vii) Monitors, updates and/or instructs the update of training materials, resources, and knowledge bases;

5. The Head of Compliance:

- (i) Organizes the completion specialized trainings and access to learning materials for members of the Compliance Team;
- (ii) Presents final proposal for updates to Safer Gambling and Customer Interactions policies and procedures for approval;
- (iii) Prepares, presents for approval and oversees the implementation of bi-annual Framework Assessments;
- (iv) Oversees the proper carrying out of the responsibilities of the Compliance Team;

Section VI: Advertisement activities

The Company shall engage in responsible advertising. According to the LOK, The Company must ensure that its marketing and advertising activities, including the offering of bonuses:

- do not encourage excessive gaming.
- are not misleading, thus f.e. do not portray gaming as an investment, misrepresent skills vs games of chance as mentioned in the CGA RG Policy.
- do not target Vulnerable persons.

All advertisement done by the Company or third parties hired by the Company will include a clearly visible Responsible Gaming message or slogan.

Bonus conditions

As bonuses are regarded by the CGA as advertisement activities, they fall under responsible advertisement conditions under the LOK and the CGA RG Policy.

Therefore, the Company will communicate to the Customer the terms and conditions of any bonus and/or promotion clearly. Furthermore, the Company is committed to not use any bonus to encourage excessive gaming.

Third party responsibility

The Company shall make any contracted third-party aware of their Responsible Gaming Policy and require them to adhere to it.

The Company is accountable for materials provided to affiliates, representatives, sponsorship, ambassadors social media influences, including wordings and visuals representations, in case these influencers actions and/ or statements pertain to paid placement of advertisements.

Any Customer who is currently under a period of self-exclusion (cooling off) or a permanent exclusion due to problem gambling, will be removed from all marketing correspondence lists. No marketing or promotional materials is to be sent to excluded Customers.

Annex A

Figure 1. Safer gambling triggers and thresholds

	Indicator	Trigger	Risk level		
			Low	Medium	High
Account indicators	<i>Declined deposits</i>	3 or more declined deposits	x		
	<i>Multiple payment methods</i>	3 or more payment methods registered within 24 hours or less	x		
		5 or more payment methods registered within 24 hours or less		x	
Time and spend indicators	<i>Frequency and amount of spend</i>	10 or more deposits of 200 GBP overall or more over 24 hours or less	x		
	<i>Overnight gambling and time spent gambling</i>	3 or more sessions overnight (between 1 AM and 6 PM) within 7 days or less	x		
		5 or more sessions during the day and 5 or more (between 1 AM and 6 PM) sessions overnight within 7 days or less		x	
		6 or more sessions during the day and 4 or more (between 1 AM and 6 PM) sessions overnight within 7 days or less		x	
		4 or more sessions during the day and 6 or more (between 1 AM and 6 PM) sessions overnight within 7 days or less		x	

Use of gambling management tools	<i>Decrease or increase in deposit limits</i>	Increase in deposit limits 2 or more times	x		
		Decrease in deposit limits 1 or 2 times		x	
		Decrease in deposit limits 3 or more times			x
	<i>Timeout</i>	Opting into a “time out” at least once		x	
Other	<i>Cumulation of triggers</i>	2 or more low or medium triggers met			x

Annex B

Figure 2. Interaction templates

1.	“Dear <first name>,” We are writing to you in regard to your account with us and your recent activity. Please be informed that as a responsible company we take the safety of our customers very seriously and we need to make sure that no harm will come to our customers as a result of their experience on our website. Our wish is for customers who play on our website to do so without any inconvenience or harm to their personal relationships, their financial situation, or their quality of life. In order to ensure your pleasant and safe experience with us, we kindly ask you to confirm if gambling is still an enjoyable hobby for you and you feel comfortable with your gambling pattern. If you are unsure on whether the above is true, you may wish to consider the below: • Do you believe your financial situation or personal relationships may have deteriorated as a result of gambling? • Have you ever found yourself wishing to stop gambling altogether but being unable to? • Have you ever found yourself gambling while at your place of business and being unable to focus on your work? • Do you believe that you’re spending less and less time with your loved ones as a result of gambling? • Have you ever found yourself hiding the fact that you gamble from your spouse, your friends, or other family members? Please be aware that you need to provide the above confirmation within XX days, otherwise your account will be locked due to our Safer Gambling policy. Please be informed that a [monthly/weekly/daily] deposit limit up to £XXX was imposed on your account during the aforementioned XX days period for the sake of your pleasant and secure experience with us.
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	Please note that there are also several options available on our website to assist you to gamble in a responsible and safe manner. These include setting and decreasing your deposit limits, Self-Exclusion, Reality Check and Timeout. Simply Log in → Menu → ‘Responsible Gambling’ → choose your preferred responsible gambling option. Thank you in advance for your cooperation. The Winomania Compliance Team" <i>If you believe gambling may be affecting you negatively, we strongly urge you to visit BeGambleAware, which commissions national prevention and treatment services to keep people safe from gambling harms https://www.begambleaware.org/ or call the National Gambling Helpline, which is available 24/7 and gives confidential information, advice and support for anyone affected by gambling problems at 0808 8020 133.</i>
2.	

	"Dear <first name>," Please be informed that as a responsible company we take the safety of our customers very seriously and we need to make sure that no harm will come to our customers as a result of their experience on our website. Our wish is for customers who play on our website to do so without any inconvenience or harm to their personal relationships, their financial situation, or their quality of life. Per our last email, since we did not receive a reply from you within the time indicated, your account has been locked in accordance with our Safer Gambling policies and procedures. Please be informed that your account will remain locked until you have confirmed that gambling is still an enjoyable hobby for you, and you feel comfortable with your gambling pattern. Thank you for your understanding. We remain at your disposal for any additional questions and concerns. The Winomania Compliance Team" <i>If you believe gambling may be affecting you negatively, we strongly urge you to visit BeGambleAware, which commissions national prevention and treatment services to keep people safe from gambling harms https://www.begambleaware.org/ or call the National Gambling Helpline, which is available 24/7 and gives confidential information, advice and support for anyone affected by gambling problems at 0808 8020 133.</i>
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3.	

	"Dear <first name>," We are writing to you in regard to your account with us and your recent activity. Please be informed that as a responsible company we take the safety of our customers very seriously and we need to make sure that no harm will come to our customers as a result of their experience on our website. Our wish is for customers who play on our website to do so without any inconvenience or harm to their personal relationships, their financial situation, or their quality of life. In order to ensure your pleasant and safe experience with us, we kindly ask you to provide us with a source of funds document (a payslip, a bank statement or any other relevant document dating no further back the 3 months) that can confirm your financial affordability. Please be aware that you need to provide the above document and confirmation within XX days, otherwise your account will be locked due to our Safer Gambling policy. Please be informed that a [monthly/weekly/daily] deposit limit up to £XXX was imposed on your account during the aforementioned XX days period for the sake of your pleasant and secure experience with us. Please note that there are also several options available on our website to assist you to gamble in a responsible and safe manner. These include setting and decreasing your deposit limits, Self-Exclusion, Reality Check and Timeout. Simply Log in → Menu → 'Responsible Gambling' → choose your preferred responsible gambling option. Thank you in advance for your cooperation. The Winomania Compliance Team" <i>If you believe gambling may be affecting you negatively, we strongly urge you to visit BeGambleAware, which commissions national prevention and treatment services to keep people safe from gambling harms https://www.begambleaware.org/ or call the National Gambling Helpline, which is available 24/7 and gives confidential information, advice and support for anyone affected by gambling problems at 0808 8020 133.</i>

4.	
	"Dear <first name>," Please be informed that as a responsible company we take the safety of our customers very seriously and we need to make sure that no harm will come to our customers as a result of their experience on our website. Our wish is for customers who play on our website to do so without any inconvenience or harm to their personal relationships, their financial situation, or their quality of life. Per our last email, since we did not receive a reply from you within the time indicated, your account has been locked in accordance with our Safer Gambling policies and procedures. Please be informed that your account will remain locked until we've received a sufficient source of funds document (a payslip or a bank statement dating no further back the 3 months). Thank you for your understanding. We remain at your disposal for any additional questions and concerns. The Winomania Compliance Team" <i>If you believe gambling may be affecting you negatively, we strongly urge you to visit BeGambleAware, which commissions national prevention and treatment services to keep people safe from gambling harms https://www.begambleaware.org/ or call the National Gambling Helpline, which is available 24/7 and gives confidential information, advice and support for anyone affected by gambling problems at 0808 8020 133.</i>
5.	
	"Dear <first name>," We are writing to you in regard to your account with us and your recent activity. Please be informed that as a responsible company we take the safety of our customers very seriously and we need to make sure that no harm will come to our customers as a result of their experience on our website. Our wish is for customers who play on our website to do so without any inconvenience or harm to their personal relationships, their financial situation, or their quality of life.

In order to ensure your pleasant and safe experience with us, we kindly ask you to provide us with a source of funds document (a payslip, a bank statement or any other relevant document dating no further back the 3 months) that can confirm your financial affordability.

Further, we kindly request you to confirm if gambling is still an enjoyable hobby for you and you feel comfortable with your gambling pattern. If you are unsure on whether the above is true, you may wish to consider the below:

- Do you believe your financial situation or personal relationships may have deteriorated as a result of gambling?
- Have you ever found yourself wishing to stop gambling altogether but being unable to?
- Have you ever found yourself gambling while at your place of business and being unable to focus on your work?
- Do you believe that you're spending less and less time with your loved ones as a result of gambling?
- Have you ever found yourself hiding the fact that you gamble from your spouse, your friends, or other family members?

Please be aware that you need to provide the above document and confirmation within XX days, otherwise your account will be locked due to our Safer Gambling policy.

Please be informed that a [monthly/weekly/daily] deposit limit up to £XXX was imposed on your account during the aforementioned XX days period for the sake of your pleasant and secure experience with us.

Please note that there are also several options available on our website to assist you to gamble in a responsible and safe manner. These include setting and decreasing your deposit limits, Self-Exclusion, Reality Check and Timeout. Simply Log in → Menu → 'Responsible Gambling' → choose your preferred responsible gambling option.

Thank you in advance for your cooperation.

The Winomania Compliance Team"

If you believe gambling may be affecting you negatively, we strongly urge you to visit BeGambleAware, which commissions national prevention and treatment services to keep people safe from gambling harms <https://www.begambleaware.org/> or call the National Gambling Helpline, which is available 24/7 and gives confidential information, advice and support for anyone affected by gambling problems at 0808 8020 133.

6.	
	"Dear <first name>," Please be informed that as a responsible company we take the safety of our customers very seriously and we need to make sure that no harm will come to our customers as a result of their experience on our website. Our wish is for customers who play on our website to do so without any inconvenience or harm to their personal relationships, their financial situation, or their quality of life. Per our last email, since we did not receive a reply from you within the time indicated, your account has been locked in accordance with our Safer Gambling policies and procedures. Please be informed that your account will remain locked until we've received a sufficient source of funds document (a payslip or a bank statement dating no further back the 3 months) and you have confirmed that gambling is still an enjoyable hobby for you and you feel comfortable with your gambling pattern. Thank you for your understanding. We remain at your disposal for any additional questions and concerns. The Winomania Compliance Team" <i>If you believe gambling may be affecting you negatively, we strongly urge you to visit BeGambleAware, which commissions national prevention and treatment services to keep people safe from gambling harms https://www.begambleaware.org/ or call the National Gambling Helpline, which is available 24/7 and gives confidential information, advice and support for anyone affected by gambling problems at 0808 8020 133.</i>
7.	
	"Dear <first name>," We are writing to you in regard to your account with us. Thank you for providing the requested SOF document in a timely manner. It is our highest priority to ensure that our customers have a safe and enjoyable experience on our platform, without incurring any financial strain or harm in the process.

	In this regard, we would like to inform you that after a thorough review, we've made the decision to limit deposit made from your account to €/£ XXX per month. Thank you for your understanding. We remain at your disposal for any additional questions and concerns. The Winomania Compliance Team” <i>If you believe gambling may be affecting you negatively, we strongly urge you to visit BeGambleAware, which commissions national prevention and treatment services to keep people safe from gambling harms https://www.begambleaware.org/ or call the National Gambling Helpline, which is available 24/7 and gives confidential information, advice and support for anyone affected by gambling problems at 0808 8020 133.</i>
8.	

	"Dear <first name>, We are writing to you in regard to your account with us and your recent activity. Please be informed that as a responsible company we take the safety of our customers very seriously and aim to ensure that our customers don't experience any harm or inconvenience to their personal relationships, financial situation, or quality of life. In order to prevent any harm to you as a result of gambling on our website, we have made the decision to permanently close your account with us in accordance with our Safer Gambling policies and procedures. As a result of this, you will no longer be able to access your account and all outstanding funds on your account balance will be transferred back to your original payment method in accordance with and within the timeframes set out in our User Agreement and our Withdrawal Policy. We strongly urge you to visit BeGambleAware, which commissions national prevention and treatment services to keep people safe from gambling harms https://www.begambleaware.org/ or call the National Gambling Helpline, which is available 24/7 and gives confidential information, advice and support for anyone affected by gambling problems at 0808 8020 133. Please, be advised that you may also register with GamStop as a prevention measure from accessing all gambling websites in the Thank you for your understanding. We remain at your disposal for any additional questions and concerns.
	The Winomania Compliance Team"
9.	

	"Dear <first name>, Please, be aware that we have received your complaint and will attempt to provide you with an appropriate solution and resolve the issue to your satisfaction as soon as possible, but in any case, within 4 weeks of the date or receipt. In the meantime, we may contact you to inquire about any additional details that may assist us in providing a decision with regards to your complaint. We kindly ask you to cooperate with such inquiries and requests to the best of your ability, in order for us to be able to resolve your complaint as fairly and as diligently as possible. Please note that we are under the obligation to provide a final answer to your complaint within 8 weeks of receiving it. Should your complaint not be resolved to your satisfaction or within the above 8-week timeframe, you may choose to refer your complaint to the independent Alternative Dispute Resolution (ADR) entity used by us free of charge. We thank you for your cooperation. We remain at your disposal for any additional questions and concerns. The Winomania Compliance Team"
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Annex C

Figure 3. QA Evaluation: Identification & action component

Compliance			Weight
17.	Recognition of CG behavior	Agent effectively recognized any customer behavior exhibited during interaction that may indicate that the customer is at risk of experiencing gambling-related harm	1
18.	Recognition of vulnerability indicator(s)	Agent effectively recognized any direct or indirect signs that the customer may be in a vulnerable position and more likely to experience gambling-related harm	1
19.	Safer gambling inquiry	Agent followed applicable at-risk customer handling & safer gambling procedures with regard to inquiring about the customer's gambling behavior	1
20.	Escalation for further assessment	Agent made an immediate escalation to the Compliance Team in the appropriate form where further assessment was necessary	1
21.	Account closure	Agent followed safer gambling account closure procedures:	5
		(i) appropriately and immediately informed customer on account closure; (ii) provided necessary safer gambling support and help information; (iii) closed the customer's account immediately thereafter; (iv) escalated account closure to Compliance Team in the appropriate form as soon as possible; (v) left an explanatory note on the customer account;	

Figure 4. QA evaluation: Response component

Component	A.	Effective	B.	Semi-effective	C.	Ineffective	Weight
Effectiveness of interaction based on customer response when asked to confirm gambling is still an enjoyable hobby for them, they are in control of their gambling, etc.	A.1.	Customer confirms no gambling issues in a calm and collected manner	B.1.	Customer does not respond	C.1.	Customer becomes aggressive with support agent or expresses negative feelings towards question(s) asked and refuses to provide answer	0
	A.2.	Customer confirms no gambling issues in a calm and collected manner	B.2.	Customer does not respond and enters into selfexclusion or timeout	C.2.	Customer becomes aggressive with support agent or expresses negative feelings towards question(s) asked and closes account	0
	A.3.	Customer admits to gambling issues	B.3.	Customer does not respond and closes account	C.3.	Customer otherwise has a negative reaction towards question(s) asked	0
	A.4.	Customer admits to gambling issues and expresses wish to close the account permanently or enter into self-exclusion					0

Category A. Effective: Effective interactions are deemed to be interactions in which there is active acknowledgement of the question(s) asked by the support agent, including such in which the customer remains calm and collected and confirms no gambling problems in a calm, collected and often elaborate manner, as well as such in which the customer does confirm the existence of a problem in a way that allows for the support agent to follow through with the applicable interaction procedure by (i) informing the customer on the account closure to follow and the reasons behind it, (ii) encouraging the customer to seek further help

and support and providing relevant information and link sources, and (iii) encouraging the customer to extend their self-exclusion to other operators, and (iv) informing the customer about the possibility of self-excluding via the Gambling Self-Exclusion Scheme.

Category B. Semi-effective: Semi-effective interactions are deemed to be interactions in which the customer provides no response to the question(s) asked, either taking no action, which allows for the support agent to continue the interaction at a later stage or closing the account/entering into self-exclusion/entering into timeout. These interactions are deemed semi-effective, due to the agent not being able to, at this stage, follow the above procedure. While such circumstances are largely outside of the agent's control, we should aim to phrase and direct our interactions with customers in a manner that allows us to prevent future harm in the most effective way possible, including by encouraging the customer to seek further help and support and to extend their self-exclusion to other operators, etc.

Category C. Ineffective: Ineffective interactions are deemed to be interactions in which the customer displays a negative reaction towards being asked question(s) with regard to their gambling behavior. While such circumstances are largely outside of the agent's control, we should aim to phrase and direct our interactions with customers in a manner that allows us to prevent future harm in the most effective way possible, including by encouraging the customer to seek further help and support and to extend their self-exclusion to other operators, etc. To that end, it is important to flag such interactions, as they may allow us to identify deficiencies in the language, phrasing, means of communication, etc. which prevent us from effectively minimizing future harm to individual customers to the largest extent possible.