



Responsible Gambling Policy – v10.0

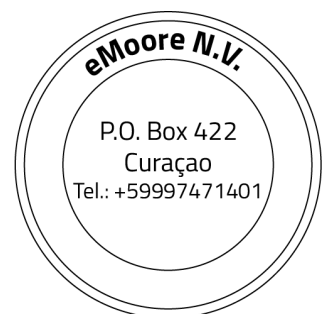
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1 Version Control

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3 Introduction and Policy Statement

Betboro is committed to promoting responsible gambling and protecting players from gambling-related harm. This policy outlines the tools, procedures, and safeguards in place to ensure a safe and transparent gaming environment in compliance with Curaçao's 2025 regulatory framework.

BetBoro believes in a responsible attitude towards gambling and has implemented measures detailed within this policy to promote and ensure responsible gambling. BetBoro believes that industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for those individuals requiring assistance.

For most people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. BetBoro appreciates that for a small number of people, gambling can have a negative impact on their life. As a result, BetBoro has developed this Responsible Gambling Policy (the '**Policy**') which outlines certain practices adopted by us when providing services to our customers.

BetBoro supports problem gambling and makes an annual contribution of 0.1% of its total gross gaming yield to a problem gambling research/support charity.

As part of BetBoro's problem gambling initiative all staff receive responsible gambling training as part of the induction process and annually thereafter.

4 Responsible Gambling

Responsible gambling involves the conduct of gambling in a manner where the potential for harm associated with gambling is reduced.

BetBoro respects the rights of our customers to enjoy our services and to take responsibility for their own conduct, but also acknowledges our own responsibility to our customers to provide them with appropriate information that may assist them to manage their gambling.

BetBoro's aim is to ensure that customers make informed decisions about gambling and if that customer requires assistance, to facilitate their access to gambling help services.

5 Information Visibility

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.

- Dedicated Responsible Gaming Contact: Players can directly contact our dedicated Responsible Gaming team via email at rg@betboro.com for confidential assistance. Customers may request support regarding gambling concerns, activation of Responsible Gambling tools (including deposit limits, time-out, or self-exclusion), or temporary or permanent account restrictions. All enquiries are treated confidentially.

6 Problem Gambling

Problem gambling occurs when there is a lack of control over gambling, particularly the scope and frequency of gambling and the amount of recreational time spent gambling.

‘Stay in control. Leave before you lose it. Gamble responsibly.’

The negative impacts may include:

- Extreme financial losses relative to their sources of income.
- Adverse personal effect on the customer, his or her family and friends.
- Adverse effect on employers and work performance.

BetBoro’s aim is to achieve equilibrium in the provision of gambling services, considering those customers who enjoy our services and use them as a form of entertainment, the wellbeing of our customers who have an acknowledged gambling problem, their families and the community at large.

7 Behavior tracking

The Company monitors customer activity to identify potential gambling problems. Behavior tracking will be done, amongst other elements, on the following factors:

- Deposit and wagering frequency;
- Repeated failed transactions due to insufficient funds;
- Reversing withdrawals;
- Inexplicable extended play sessions;
- Frequent changing to Responsible Gaming tools;
- Unreasonable increased communication with customer support;
- Attempts to open multiple accounts to bypass deposits or loss limits.

Behavior tracking will be conducted by the Company’s frontline personnel (such as customer support and/or VIP manager) and if at risk gambling behaviour arise, this behaviour is flagged for further handling. In addition, the Company can use technological tools including AI (Artificial intelligence) or ML (Machine Learning) for the flagging of gambling problems.

7.1 Player profile and Risk Assessment

The Company will create a customer profiler based on their risk rating. This Customer profile will determine the Customer's risk towards at risk gambling behavior, and the appropriate level of monitoring and Customer intervention.

7.2 Responsible Gaming intervention

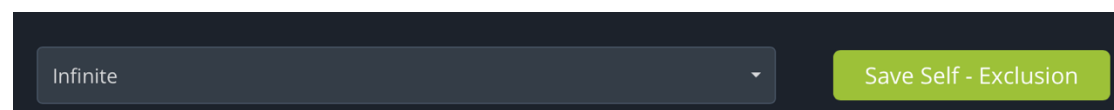
Customers identified as exhibiting at risk gambling behavior will be informed of the Responsible Gambling tools available. These tools are designed to combat at risk gambling behavior. These RG tools can range from deposit limits, cooling off and, self-exclusion options.

The Company can also apply the following to the Customer's account if the at-risk gambling behavior persists:

- Applying mandatory deposit limit to the Customer's account;
- Temporarily suspend the Company's account pending further investigation for at-risk gambling behavior;
- Permanently exclude the Customer in case of severe or persistent risk.

8 Self-Exclusion

Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. BetBoro 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 Company takes all reasonable steps to refuse service or to otherwise prevent the individual who has entered a self-exclusion agreement from participating in gambling.



It is also BetBoro's policy to close an account which shows signs of a gambling problem, for example, if a customer mentions that he/she has financial difficulties as a result from overspending on gambling, this will indicate that the customer has a gambling problem, and the customer support team would enquire further and take appropriate action.

Any person wishing to self-exclude from our services can obtain information from us by contacting customer support by live chat or email or by clicking the responsible gambling link on the footer of our website.

BetBoro will take all reasonable steps to ensure that customers on our self-exclusion register are prevented from using their existing accounts or opening new accounts. Whilst on the self-exclusion register, customers also have certain obligations contained in the terms and conditions that they acknowledge when joining the self-exclusion program.

Customers can navigate directly to details of how to self-exclude through the responsible gaming page at the footer of the website(s). The responsible gaming page states as follows:

We close and prevent access to your online account for a specified period (between six months and five years). Your account can only be opened again after expiry of the self-exclusion period and following a 24-hour “cooling off” period where you are asked to fully consider your decision to resume gambling. After this deadline, please contact us again if you wish to extend your self-exclusion. Please note that you are not able to reduce or cancel your self-exclusion period.

For further details, please contact our support team or refer to the Terms and Conditions and Responsible Gaming.

The Company has the following procedures designed to ensure the self-excluded customer cannot gain access to gambling:

- Register of those excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the operator);
- A record of the card numbers to be excluded.
- Staff training to ensure that staff can administer effectively the systems; and
- The removal of access from those persons found to have gambled or who have attempted to gamble on the facilities.

The Company then signposts the individual to counselling and support services and encourages extending their self-exclusion to other remote gambling operators and making use of the national multi-operator self-exclusion scheme (GAMSTOP).

8.1 Self-Exclusion via Online

A customer can self-exclude automatically via the ‘My Account’ function online. Customers can self-exclude for a period of 6 months, 1 year, 3 years, or 5 years, 10 years or indefinite.

Upon the implementation of self-exclusion, the following is undertaken:

- Customer account is flagged as self-excluded.
- Customer is signposted to counselling and support services.
- Customer will be unable to participate in any gambling activity.
- Customer will be removed from BetBoro’s marketing database immediately after the account has been flagged as self-excluded.
- All unsettled bets will be void and stakes are refunded.
- All remaining funds within the customer’s account are returned to the customer.

8.2 Self-Exclusion via E-mail or Live Chat

A customer can self-exclude by contacting customer support by live chat or e-mail. Upon receipt of a request to self-exclude via these methods the customer’s account should be deactivated immediately whilst, if necessary, further information is sought. If the request is received by e-mail, or live chat whilst the customer is not logged in, BetBoro will request that the customer verify their identity by answering a random combination of security questions such as:

- Date of birth
- Telephone number
- First line of address clarification.

The customer must then advise what type of exclusion they would like to pick and then confirm whether they understand the consequences of self-excluding. By telephone, email, or live chat, this can be a direct question to the customer asking whether they understand.

Once the chat or phone session has ended, Customer Support will place a note on the account to explain they were contacted by the customer to self-exclude. The above self-exclusion stages then apply.

When BetBoro have confirmed the identity of the customer, the following is undertaken:

- Customer's account is flagged as self-excluded
- Customer is signposted to counselling and support services
- Customer is unable to participate in any gambling activity
- Customer is removed from BetBoro's marketing database immediately after the account has been flagged as self-excluded
- All unsettled bets will be void and stakes refunded
- All remaining funds within the customer's account are returned to the customer

My Profile

Documents **Self - Exclusion** Time - Out Reality Check Accumulated Losses

You will enter a voluntary self-exclusion agreement, preventing access to your online account for the time period specified (between 6 months and 5 years). Once you have made the decision to self-exclude with Betboro, this is irrevocable.

Whilst every effort will be made on our side to ensure that you do not open accounts under this licence, we cannot be held responsible if you attempt to open accounts illicitly, for example using alternative identification details. Please remember self-exclusion is a voluntary choice which requires your full cooperation.

Your account will only be re-opened if you contact us requesting to resume gambling after the self-exclusion period has expired. Any requests to resume gambling will be subject to a 24 hour "cooling off" period before gambling may resume. Alternatively, you may request an extension of the self-exclusion at this stage which will be applied immediately.

May we take this opportunity to encourage you to self-exclude from any other betting accounts that you hold. Customers experiencing gambling problems should seek help. For further details please contact our support and refer to the Terms and Conditions and Responsible Gambling pages.

By continuing you acknowledge that you have read and understood the above message.

☒
 6 months
 1 year
 2 years
 3 years
 5 years
 Infinite

Save Self - Exclusion

The screenshot shows a 'Self-exclusion' form with the following fields and callouts:

- Self-exclusion**: A callout points to the title of the form.
- In the Social Preferences, at the bottom you'll see Self-Exclusion**: A callout points to the bottom of the form.
- Excluded From**: A text input field.
- Excluded Until**: A date and time selector with a callout: **Choose the Period, 6 months, 1 year, 2 years or 5 years**.
- Type**: A dropdown menu with options: **Nothing Selected**, **Time Out**, **Self Exclusion**, **SportsBook Temporary Blo...**, **Beting Block**, and **Nothing Selected**. A callout points to this menu: **Choose the Type**.
- SAVE**: A button with a callout: **SAVE**.

8.3 Reopening a Self-Excluded Account

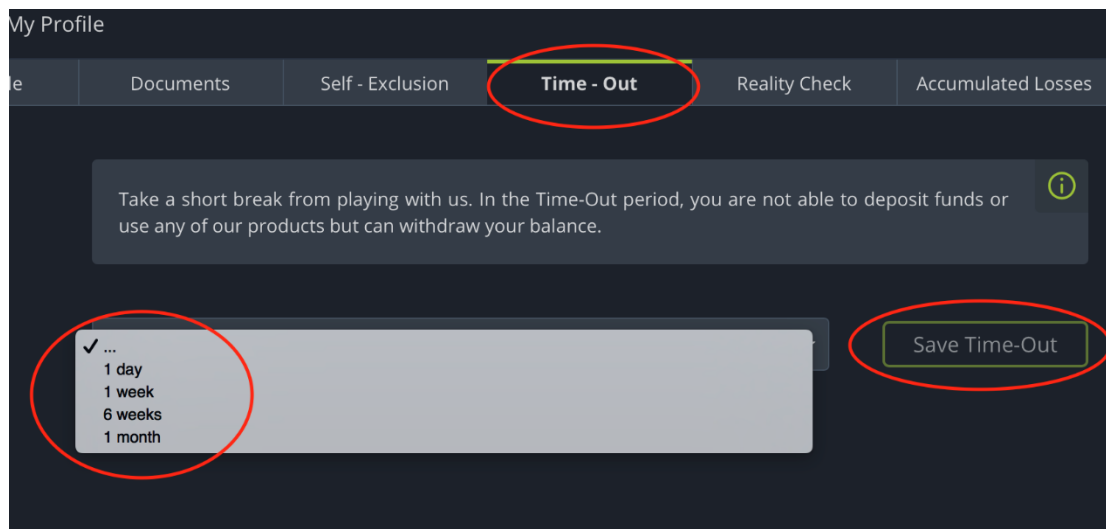
When a customer self-excludes for a period (6 months to 5 years), under no circumstances can the customer re-open their account until such period as chosen by the customer has expired. Upon expiry of the self-exclusion period, should the customer wish to re-activate their account they are required to take positive action to begin gambling again by calling customer support. No e-mails should be sent to the customer to advise them of the expiry of their self-exclusion and positive action should be undertaken on the customer's own accord.

Upon a customer requesting their account be re-opened BetBoro will first contact the customer by telephone and request that the customer verify their identity by answering a random combination of; security questions, date of birth, telephone number and first line of address clarification. The customer will also be advised to provide their request in writing which can in the form of an email from the customer registered email address. BetBoro will then decide as to whether the account will be re-activated. Upon advising the customer that the account can be reactivated, so that they can begin gambling again, a further cooling off period of 24 hours will be initiated prior to reactivation. No marketing material should be sent to the customer unless the customer has reconfirmed their agreement to receiving such material.

9 Time-Out

For customers who wish to take a short break from gambling BetBoro offers a time-out facility. Customers can set a time-out on their account through the 'My Account' function or via live chat or e-mail for a period of:

- 24 hours.
- One week.
- One month.
- Two months.



During this time-out the customer will have their account closed and all marketing material stopped.

The Company will ensure that the duration and marketing opt out options are always available to choose from. The Company will communicate which cooling off options are further available to the Customers

The customer can choose from the following when setting options for Cooling off:

The selection of restrictions submitted by the Customer will take effect immediately. The Company will not delay the activation of the Cooling off. Furthermore, The Company will not question the Customer's decision for accepting cooling off or conduct Marketing activities once opted out by the Customer.

The Company will incorporate a verification check for the selected periods of 1 or 3 months of cooling off for confirmation of such. The check will only be asked online and will be neutrally expressed.

The Customer's funds will remain accessible for withdrawal as the account will remain active but disabled.

The Customer's account will be automatically reactivated after the selected Cooling off period expires. No further action is required by the player.

Customers can find details of the time-out facility through the Responsible Gambling page at the footer of the website(s). The Responsible Gambling page states as follows:

A little break can do you a world of good. If you need a little break from playing on our website, you can do so using the time out option. You can set up a time out of 24 hours, a week, a month or even two months. Once you have selected a period, you will not be able to make further deposits or enjoy any services on our site. Although you have restrictions, you are still able to request a withdrawal if there are any deposits in your account.

10 Deposit Limits

For customers who wish to control the amount of money they are gambling BetBoro offers the opportunity to set a deposit limit. Deposit limits are offered as part of the first registration process and within the customer's 'My Account' function. Customers can also set a deposit limit by contacting customer support via live chat or e-mail.

Max Daily Deposit*	500
Max Weekly Deposit*	700
Max Monthly Deposit*	1000

Customers can find details of the deposit limit facility through the Responsible Gambling page at the footer of the website(s). The Responsible Gambling page states as follows:

You can use deposit limits to limit the number of deposits made to your account. The amount can be set for a daily, weekly or monthly period. This allows you to keep track of the amount of deposit to your account before betting takes place. The limits cannot be lifted by us, but you can reduce the deposit limit at any time. Changes will be made seven days after your request. Before raising your deposit limit, consider carefully whether you can afford it. Never choose to increase your limit because you have lost money and believe you can recover the amount lost by playing. This option is available in your player account under deposit limits, and you can set up, change, and confirm them.

Customers can reduce their deposit limit via the 'My Account' function, which are undertaken immediately and by live chat or e-mail, which are undertaken within 24 hours.

Customers are also able to increase their deposit limit via the 'My Account' function, live chat and e-mail. Increases are subject to a 24-hour cooling off period.

Players > chris

General Financial Reports **Settings**

SportsBook Settings **Go to Social Preferences** **Deposit Limits**

Social Preferences

Payment Types

Limit Change History

Set the Deposit Limit per Day, Week and Month.
Please NOTE: In the Backoffice we are able to set Max Year Deposit and also Max Single Amount (which is the max Single Amount to be deposited at once)

Max Single Amount	Max Day Deposit Amount	Max Weekly Deposit Amount	Max Monthly Deposit Amount
	10	70	300
Max Year Deposit Amount			

The screenshot shows the 'DEPOSIT LIMITS' page in a dark-themed interface. At the top, a navigation bar includes links for 'PERSONAL DETAILS', 'CHANGE PASSWORD', 'VERIFY ACCOUNT', 'TIME-OUT', 'SELF-EXCLUSION', and 'GAMSTOP'. Below this, a secondary bar contains 'REALITY CHECKS' and 'DEPOSIT LIMITS', with the latter being highlighted by a red circle and a callout bubble that says 'Go to DEPOSIT LIMITS'. The main content area is titled 'DEPOSIT LIMITS' and contains a paragraph explaining that deposit limits allow users to restrict the amount of money entering their account. Below this, there are three input fields for 'Day', 'Week', and 'Month'. The 'Day' field has a value of '10', 'Week' has '70', and 'Month' has '300'. A red circle highlights these fields, with a callout bubble stating 'Type in your wished amount you want to set as your Daily, Weekly and Monthly Limit'. At the bottom right, a green 'SAVE' button is highlighted by a red circle, with a callout bubble saying 'Click SAVE'. A red line of text at the bottom states: 'Please note that you'll be able to increase your limits only after 24 hours from your 1st request.' Below this, there is a link for 'IMPORTANT INFORMATION'.

11 Reality Checks

Customers can set a frequency at which they will receive and see on the screen a reality check within a gambling session.

Through 'My Account' customers are offered the option to set a reality checks for the following frequencies:

- 10, 20 or 30 minutes.
- 1 – 8 hours.

My Profile

le Documents Self - Exclusion Time - Out **Reality Check** Accumulated Losses

We offer you an opportunity to manage the amount of time spent playing, by setting up a Reality Check on your account. Once you have saved your reality check time, you get a pop-up once this period has come up on the start of a casino session - placing a real money wager.

☐ no limit
☐ 10 mins
☒ 20 mins
☐ 30 mins
☐ 45 mins
☐ 1 hour
☐ 2 hours
☐ 4 hours
☐ 6 hours
☐ 8 hours

Save

Upon reaching the reality check timer e.g. 10 minutes, the system will advise the customer that 10 minutes has elapsed since their session began. At this point the customer can request to continue gambling or set another time limit.

All reality check notifications offer the customer the option to exit the gambling session e.g. log out and provides a link to the customer's account history:

Alert

You have been playing for 10 minutes. Please select if you want to continue or stop playing.

CONTINUE END AND OPEN BET HISTORY

Customers cannot proceed to gamble further until the reality check has been acknowledged.

12 Player Protection Measures

To prevent and combat problem gambling we provide, through our Responsible Gambling page, several measures to assist our customers including:

12.1 Independent Organisations

Our homepage displays the logo and direct link to GambleAware to assist problem gamblers – www.gambleaware.co.uk

These links are readily available on the footer of the website.

The following information is provided on the Responsible Gambling page:

Do you need help finding tips on how to control games?
Visit the following independent organisations that can help you:

GamCare

Web: www.gamcare.org.uk

E-mail: info@gamcare.org.uk

Helpline: (+44) 0845 6000133

Phone: (+44) 020 7378 5200 Fax: (+44) 020 7378 5237

Gordonhouse

Web: www.gordonhouse.org.uk / www.gamblingtherapy.org

E-mail: help@gordonhouse.org.uk / webmaster@gamblingtherapy.org

Phone: (+44) 01384 241292

GA Gamblers Anonymous

Web: www.gamblersanonymous.org.uk

Tel: 0207 384 3040

Gam-Anon

Web: www.gamanon.org.uk

Tel: 08700 50 88 80

Do you have a family member or a friend who is keen to seek help with gambling addiction?
Contact us if you need more information on organisations that offer help.

12.2 Problem Gambling Self-Assessment

The Responsible Gambling page contains a simple checklist that anyone who thinks they have a problem gambling can work through and get an insight into whether they do have a problem.

Do you have a gambling problem?

Undertake the following self-assessment to ascertain if you may have a gambling problem.
If you answered “yes” to seven or more of these questions you may have a gambling problem.

1. Have you ever lost time from work due to gambling?

2. Has gambling ever made your home life unhappy?
 3. Has gambling affected your reputation?
 4. Have you ever felt remorse after gambling?
 5. Have you ever gambled to get money to pay debts or solve financial difficulties?
 6. Has gambling ever caused a decrease in your ambition of efficiency?
 7. After losing, do you feel you must return as soon as possible to win back your losses?
 8. After winning, do you have a strong urge to return and win more?
 9. Do you often gamble until you run out of money?
 10. Have you ever borrowed money to finance your gambling?
 11. Have you ever sold anything to finance your gambling?
 12. Are you reluctant to use "gambling money" for normal expenditures?
 13. Does gambling make you careless of welfare of yourself and your family?
 14. Do you ever gamble longer than planned?
 15. Have you ever gambled to escape worry or trouble?
 16. Have you ever committed or considered committing an illegal act to finance gambling?
 17. Has gambling ever caused you to have difficulty sleeping?
 18. Do arguments, disappointments or frustrations create within you an urge to gamble?
 19. Do you ever get the urge to celebrate any good fortune with a few hours of gambling?
 20. Have you ever considered self-destruction as a result of your gambling?
- The Company will recommend that any Customer who recognize problematic gambling behaviours through self-assessment should explore the available responsible gambling tools.

12.3 Filtering Software

The responsible gaming page contains a link to filtering software providers which enable customers to prevent children and young people accessing gambling sites via their computers.

Betboro doesn't allow minors (individuals under the age of 18) to participate in games and make bets.

That's why your date of birth is a mandatory requirement during registration.

Betboro takes the issue of minors taking part in online betting very seriously. In order to offer the best possible protection for minors, we also rely on the support of parents and careers.

Furthermore, we would recommend that you install software that allows you to restrict access to online content deemed inappropriate for children.

We recommend one of the tools listed below:

Netnanny: www.netnanny.com/features/internet-filter

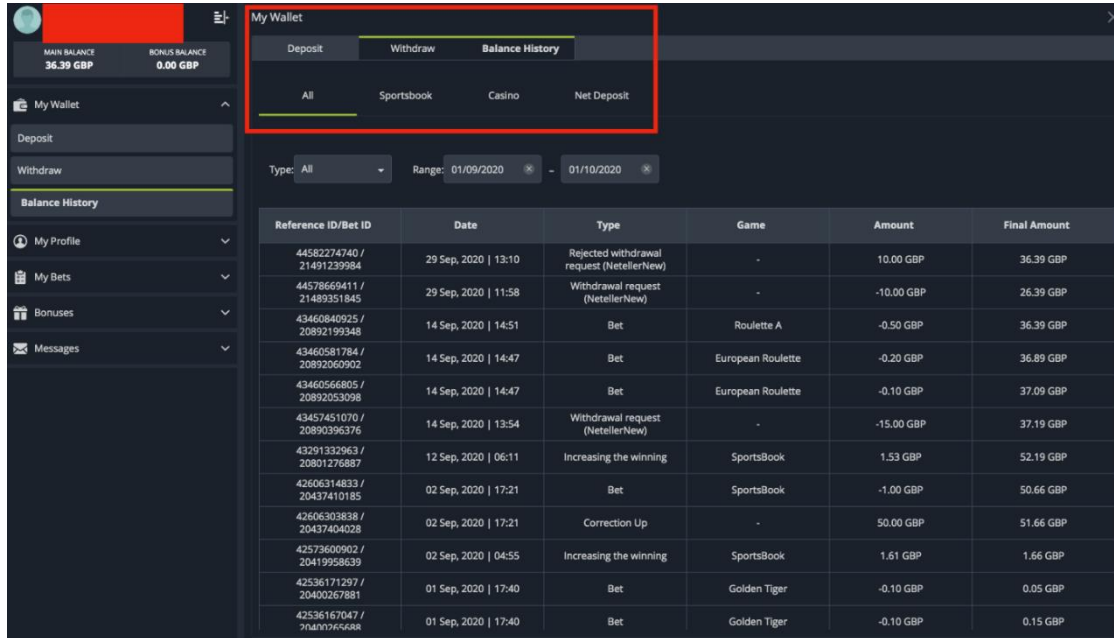
Gamblock: www.gamblock.com

Betfilter: <http://www.betfilter.com/>

CYBERSitter: <https://www.cybersitter.com/>

12.4 Gambling History

A registered participant's gambling history is available, including all deposits and withdrawals. This information allows a customer to monitor their gambling spend. A full statement can be found within the customer's 'My Account' function under 'Statement'.

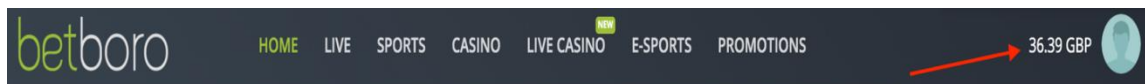


Reference ID/Bet ID	Date	Type	Game	Amount	Final Amount
44582274740 / 21491239984	29 Sep, 2020 13:10	Rejected withdrawal request (NetellerNew)	-	10.00 GBP	36.39 GBP
44578669411 / 21489351845	29 Sep, 2020 11:58	Withdrawal request (NetellerNew)	-	-10.00 GBP	26.39 GBP
43460840925 / 20892199348	14 Sep, 2020 14:51	Bet	Roulette A	-0.50 GBP	36.39 GBP
43460581784 / 20892060902	14 Sep, 2020 14:47	Bet	European Roulette	-0.20 GBP	36.89 GBP
43460566805 / 20892053098	14 Sep, 2020 14:47	Bet	European Roulette	-0.10 GBP	37.09 GBP
43457451070 / 20890396376	14 Sep, 2020 13:54	Withdrawal request (NetellerNew)	-	-15.00 GBP	37.19 GBP
43291332963 / 20801276887	12 Sep, 2020 06:11	Increasing the winning	SportsBook	1.53 GBP	52.19 GBP
42606314833 / 20437410185	02 Sep, 2020 17:21	Bet	SportsBook	-1.00 GBP	50.66 GBP
42606303838 / 20437404028	02 Sep, 2020 17:21	Correction Up	-	50.00 GBP	51.66 GBP
42573600902 / 20419958639	02 Sep, 2020 04:55	Increasing the winning	SportsBook	1.61 GBP	1.66 GBP
42536171297 / 20400267881	01 Sep, 2020 17:40	Bet	Golden Tiger	-0.10 GBP	0.05 GBP
42536167047 / 704801076588	01 Sep, 2020 17:40	Bet	Golden Tiger	-0.10 GBP	0.15 GBP

Should a customer require further detailed information in order to reconcile their activity, this can be obtained by contacting the customer support team. If the Customer requests records of their betting history longer than 6 months ago, then the company will aim to provide these records to the Customer within 10 working days or in line with the applicable data protection legislation, whichever is longest. However, the Customer must bear in mind possible (legal) limitations regarding record keeping and that not all records will always be available to the Company

12.5 Account Balance

An up-to-date account balance is always available to customers at the top of their screen to allow a customer to keep an eye on his or her spend.



12.6 Gameplay Indicating Possible Cause for Concern

BetBoro have created a range of triggers to identify gameplay that could be indicating possible cause for concern. These triggers are based on:

- 12 months rolling deposit (value).
- 30 day rolling deposits (value).
- 7 day rolling deposits (value).

- Daily deposits.
- 30 day rolling deposits (number of).
- 7 day rolling deposits (number of).
- Daily deposits (number of).
- Consecutive days gambling.
- Consecutive hours gambling (casino).
- Number of cancelled withdrawals (30 days rolling).
- Number of cancelled withdrawals (7 days rolling).

Following identification based on the above triggers, a full review of the account is conducted. When reviewing customer accounts, the following criteria is considered which may raise problem gambling concerns but is not limited to:

- Time and spend indicators: amount and frequency of time and deposits, time of day, large losses.
- Account indicators: cancelled withdrawals, failed deposits, multiple payment methods.
- Use of responsible gambling tools: changing deposit limits, trying to stop reversing withdrawals, previous self-exclusions or previous customer interactions.
- Customer contact: information or hints from customers, frequent complaints, requests for bonuses following losses, arguments over losses or belief that games are fixed, or signs of distress.
- Play indicators: chasing losses, erratic betting patterns and product choice.
- A 'big win': high staking following a win could hide or even lead to harmful behaviour.
- KYC: What KYC is held, does any give detail of the customer affordability?
- Previous referrals: Has the player been investigated or interacted with previously?

If problem gambling concerns are raised following a review of a customer account, then a customer interaction will be initiated, and the Customer Interaction Process followed (see Customer Interaction Policy and Daily Monitoring Procedure).

If management elect to contact the player, they may do so via email or telephone. They will ask the customer directly if they are happy with their levels of gambling and whether they have read our responsible gambling page and are aware of the facts surrounding gambling.

If a manager cannot reach a player or does not receive a satisfactory response the account will be suspended until the player gets in touch and confirmed they are in control of their gambling.

12.7 Preventing Underage Gambling

BetBoro do not allow anyone under 18 years of age to play on their website(s). For further details please refer to BetBoro's Age Verification Policy. Age verification occurs prior to allowing a customer to deposit, bet (with real money or free bets) or play any free-to-play games. In the unlikely event that an underage player does manage to play, all deposits will be returned to the customer regardless of win or loss. The account will be closed immediately.

12.8 Preventing Customers from Opening Duplicate Accounts

A report is produced daily of all new registrations to identify potential duplicate accounts. A search is conducted to identify accounts with matching first name, surname and DOB. The account is investigated and if the duplicate is confirmed, then the account is blocked, and action taken accordingly. The usual course of action is to void all open bets and refund all stakes to the original payment method. All actions are recorded within the customer notes, along with ticket numbers.

All duplicate accounts will be identified and blocked within 24 hours.

A further check is carried out for all self-excluded accounts to ensure duplicate accounts are not created.

12.9 Language

All problem gambling material and content is available in English language only.

Procedures remain the same irrespective of language.

13 Complaints Handling

Occasionally when a customer requests self-exclusion they will ask to be compensated for their loss. This request should be escalated to management and the outcome or decision will be conveyed to the customer via e-mail.

In extraordinary circumstances they may be referred to senior management. If a customer support representative becomes concerned about the customers gambling, they may decide to engage with the customer about it to establish whether they are gambling beyond their means.

Triggers that may start this conversation could include (but not limited to) repeated requests for bets to be cancelled, repeated requests for free bets or bonuses, repeated requests to extend limits and other scenarios.

If a customer requests permanent closure of their account and then re-opens a further account all deposits will be cancelled, refunded and any bets void.

Any correspondence from a customer threatening self-harm or legal action should be brought to the attention of senior management.

Anything that a staff member is uncertain of or might cause concern at a later stage should be escalated to senior management.

14 Advertising and Promotions

BetBoro make sure that advertising or promotions comply with all applicable laws associated to the advertising and promotion of gambling products. Such advertising and promotions will be rolled out in a socially responsible manner.

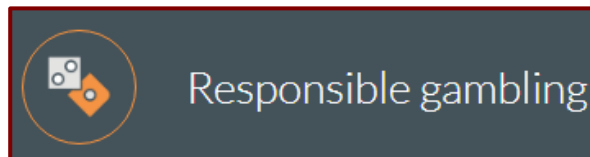
According to the LOK, The Company must ensure that its marketing and advertising activities, including the offering of bonuses:

- 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.

Any customer who is currently under a period of self-exclusion or indeed a permanent exclusion due to problem gambling, or is considered a vulnerable person shall be removed from all marketing correspondence lists. As such, no marketing or promotional materials shall be sent to excluded customers. As such, no bonuses, free play, or incentives may be offered during this period.

15 Staff Training and Support

All staff are provided with induction training on responsible gambling and annually thereafter.



The trainings given will cover at least the following:

- Recognizing signs of gambling distress (e.g. Agitation, aggression, or financial desperation)
- Conducting sensitive and structured conversations with at risk Customers.
- Directing Customers to appropriate Responsible Gambling support resources.

Staff are also advised that if they need support following a difficult conversation regarding gambling addiction or if they think they may have a gambling problem and need support they can contact GamCare either with a manager present or in confidence.

End of Document