



Responsible Gaming Policy for Licensed Operators

Version 1.0

21st February 2025

Contents

| | |
|---|----|
| Definitions | 4 |
| Policy Overview..... | 5 |
| Mandatory Requirements | 5 |
| Player Protection | 6 |
| Transition Period | 6 |
| Player Information and Accessibility | 7 |
| Homepage Accessibility | 7 |
| Terms & Conditions Inclusion..... | 7 |
| Footer Information Requirements | 7 |
| Age Verification..... | 8 |
| Age Verification Requirements | 8 |
| Parental Control and Internet Filtering Tools | 9 |
| Self-Assessment..... | 9 |
| Behaviour Tracking..... | 10 |
| Key monitoring factors | 10 |
| Procedures for Player Identification and Intervention | 11 |
| Training and Staff Readiness | 12 |
| Escalation | 12 |
| Cooling Off | 12 |
| Availability and Accessibility | 12 |
| Immediate Activation and Restrictions..... | 13 |
| Reactivation and Additional Time-Out Options..... | 13 |
| Self-Exclusion..... | 13 |
| Self-Exclusion Process and Requirements..... | 14 |
| Accessibility and Communication | 14 |
| Immediate and Irreversible Action | 14 |
| Self-Exclusion Periods and Restrictions | 14 |
| Financial and Account Management..... | 15 |
| Reactivation and Post-Exclusion Protocol | 15 |
| Marketing and Contact Restrictions | 15 |
| Compliance and Regulatory Obligations | 16 |
| Operator-Initiated Exclusion | 16 |
| Limits | 16 |
| Deposit Limits | 16 |

| | |
|--|----|
| Other Limits | 17 |
| Exceptions to Limits and Exclusions | 17 |
| Reality Check..... | 17 |
| Marketing and Advertising | 18 |
| Advertising and Marketing Guidelines..... | 18 |
| Advertising and Marketing Restrictions | 18 |
| Responsible Gaming Commitments in Consumer Advertising | 19 |
| Consultation Period. | 20 |

Definitions

Games of Chance means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker

LOK is the National Ordinance on Games of Chance law of Curacao.

Marketing, promotion and advertising refer to all resources, messages and media that promote the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns.

Mandatory Requirements are the basic elements of a Responsible Gaming policy that must be implemented by all operators. These elements must reflect the target markets and players of the operator.

Operator is a holder of a B2C license from the Curacao Gaming Authority (or holder of an Orange Digital Seal "Certificate of Operations")

Self-exclusion is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator. That self-exclusion should apply across all domains and brands operated by the same operator.

Vulnerable Person is defined in the Clause 1.1 (h) of the LOK as

1. Under eighteen years of age.
2. Has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people.
3. Has been banned from playing any Game of Chance either by force or at his or her own request.
4. Has been declared bankrupt.

Policy Overview

The Curacao Gaming Authority (CGA) is committed to fostering a safe, transparent, and fair gaming environment. As the regulator responsible for overseeing the online gambling sector in Curacao, the CGA verifies that all licensed operators implement and maintain robust Responsible Gaming measures.

As part of its regulatory mandate, the CGA sets and enforces standards that mitigate the risks associated with problem gambling. Operators are expected to integrate Responsible Gaming principles into their business models, ensuring that gambling remains an enjoyable form of entertainment rather than a source of harm.

Operators must develop, document in writing, upload to the CGA Licensee Portal, and implement a Responsible Gaming policy which will be reviewed by the CGA to ensure that the policy aligns with the target audience and markets of the operations.

Mandatory Requirements

Certain Responsible Gaming elements are **mandatory** for operational compliance with the CGA gaming license:

- Age verification
- Information accessibility
- Player self-assessments
- Behaviour tracking
- Player facilitated cooling-off periods and self-exclusion
- Deposit limits
- Training of employees, affiliates, marketing partners, social media influencers
- General responsible gaming principles regarding marketing and advertising

However, the CGA encourages that minimum mandatory requirements are voluntarily exceeded by operators incorporating any/all of the other responsible gaming tools referenced in this document, where the operator's business model merits a higher degree of responsibility.

This policy requires that the operator will appoint someone which fulfils the responsible gaming role in the organization. Unless/until there is a dedicated Responsible Gaming Officer, the Compliance

Officer (not AML/CFT) is responsible for implementing and enforcing the Responsible Gaming policy and must provide a report to the operators Executive Management team no less frequently than once every twelve (12) months as to the effectiveness of the policy and related operational procedures and shall provide recommendations to management as to proposed operational or policy enhancements. Any changes to policy must be reported to the CGA.

Player Protection

Online gaming providers must take proactive steps to protect vulnerable persons, promote responsible gambling and prevent problem gambling behaviour. This includes:

- Clear Responsible Gaming policies and programs must be implemented by all operators.
- Operators must provide Responsible Gaming tools and educational resources to players.
- Monitoring mechanisms must be in place to detect and address problematic gambling behaviour
- Operators must comply with all regulatory reporting and auditing obligations.

Transition Period

Four months after this policy is published, the CGA will begin verifying and actively monitoring this Responsible Gaming policy. Regardless of when monitoring begins, the operator must immediately implement as many mandatory requirements as possible and initiate any necessary arrangements, including technical development, to meet the remaining minimum requirements within the transition timeline.

The Responsible Gaming policy will be uploaded by new LOK applicants as part of their application once the portal re-opens mid-March. Existing provisional LOK license holders and applicants currently in progress (i.e. submitted before 24th December 2024) must have their Responsible Gaming policy uploaded to the CGA Licensee Portal on or before 31st March 2025.

Player Information and Accessibility

At all times operators must ensure that sufficient information is provided throughout their website or application interface to enable players to make informed choices and take immediate action when necessary.

Homepage Accessibility

- A clear and visible link to the Responsible Gaming Policy must be present on the homepage and accessible from relevant pages of the website or application interface.
- The Responsible Gaming Policy must be made available in English and the language of the target market.
- Players must be provided with direct access to Responsible Gaming tools that allow them to manage their gaming behaviour including, but not limited to, self-exclusion, cooling-off period, limit setting and other responsible gaming measures.
- The homepage must also display clear information on how players can contact the operator regarding responsible gaming concerns via email.

Terms & Conditions Inclusion

- The Responsible Gaming Policy must be explicitly referenced and included within the Terms & Conditions of the website.
- The Terms and Conditions must be no more than one click away from the homepage of the website.
- Players must be informed about the responsible gaming tools available, their functionality, and how they can be used.

Footer Information Requirements

The footer of the gaming website must contain the following essential details:

- A clear visual indication that under-age gambling is prohibited.
- The name and registered address of the license holder.
- The official license number issued by the Curacao Gaming Authority.
- A statement confirming the regulatory oversight of the Licensee's operations by the Curacao Gaming Authority.

- A link to the Responsible Gaming Policy Statement.
- The operators CGA digital seal.
- A link to gambling addiction support resources (both local and international), including for example
 - International support sites, such as Gamcare, Gamblers Anonymous, Gambleaware.
 - Local support sites (where available) in the markets that the operator targets.

Age Verification

The operator must have strict age verification processes in place to prevent underage gambling. Players must confirm they are of legal gambling age before they can deposit or play.

Age Verification Requirements

- Operators must implement rigorous age verification processes to ensure that all participants are of legal gambling age. Players must not be able to deposit or place wagers unless the operator is satisfied that the player is 18 or older.
- During account registration, the operator must verify that the player is not a minor through Date of Birth confirmation (and also if possible open source verification, an *I am over 18* tick box, and confirmation of payment method e.g. Credit card). If the verification process determines that a player is underage or the operator has reason to suspect the player is underage, then access must be denied, and appropriate actions must be taken. Excepting any funds frozen in accordance with the AML policy any funds deposited by a minor must be returned, and any winnings must be forfeited. The operator must clearly communicate the reasons for account closure to the minor.
- Age verification is subject to the CGA's Know Your Customer and AML policies and should at a minimum include a government-issued valid ID check (such as a passport, national ID, or driver's license). If the operator has any doubt whatsoever of a player's age prior to KYC or AML milestones being reached, age verification should be undertaken at that point.
- If necessary, secondary verification methods, such as proof of address, selfie verification, or third-party database checks, should be employed.
- Operators must maintain records of all age verification attempts and their outcomes. These records must be made available for regulatory review.

Parental Control and Internet Filtering Tools

To further prevent underage gambling, the operator can remind adults that they should take precautions when sharing devices with minors - such as safeguarding usernames, passwords, and payment details. Additionally, the operator may consider links to third-party software that can help restrict access to gambling websites. While there are myriad options available globally, the following third-party tools are examples that are available for parental control and website blocking:

Net Nanny – www.netnanny.com

GamBlock – www.gamblock.com

CyberSitter – www.cybersitter.com

Self-Assessment

Players must be able to access a detailed record of their betting and wagering history including timestamps of transactions from their player account from the date the account was opened.

Players should be encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits by providing self-assessment tools that allow them to answer a series of questions designed to help identify potential problem gambling behaviours. These tools empower players to make informed decisions about their gambling activity.

One commonly used test is available from Gamblers Anonymous – it is a 20 question quiz that is published on its website. <https://gamblersanonymous.org/20-questions/>

Alternatively or additionally operators could provide players with access to scientifically recognized screening tools, which may include:

The CAGE Questionnaire (Adapted for Gambling)

Players are encouraged to answer the following questions honestly:

1. **C – Cut Down:** Have you ever felt you should cut down on your gambling?
2. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
3. **G – Guilty:** Have you ever felt guilty about your gambling?
4. **E – Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

The operator must recommend that any player who recognize problematic gambling behaviours through self-assessment should explore the available responsible gambling tools.

Behaviour Tracking

Active monitoring detects signs of problematic gambling. By analysing deposit activity, betting patterns, session durations, and player interactions, the operator can identify at-risk individuals and take proactive steps to prevent gambling-related harm. This is also relevant in connection with Article 1.4(e) LOK that prohibits the operator to give a person who must within reason be assumed to be a vulnerable person, the opportunity to play games of chance.

Behaviour tracking is typically undertaken by frontline staff (such as customer services or VIP managers) as they are in the best position to identify problematic behaviour through patterns and direct interactions. A structured process on flagging potential vulnerable gamblers may serve as a trigger for a more detailed behavioural analysis and should be included in the Responsible Gaming policy itself.

In addition to using trained staff the CGA also permits operators to use technological tools including but not limited to gaming platform features, in-game tools, artificial intelligence (AI) or machine learning (ML).

Key monitoring factors

- Deposit and wagering frequency – sudden increases or erratic deposit, wagering or gaming session patterns.
- Use of multiple payment methods – particularly attempts to bypass limits.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- Extended play sessions – prolonged gaming without breaks.

- Increased communication with customer support – including requests for bonuses or signs of agitation.
- Frequent changes to responsible gaming tools – such as continuously increasing deposit or loss limits or repeatedly making use of cooling-off period.
- Players under 25 years old spending substantial amounts, particularly on casino or virtual games.
- Players maxing out a credit card and attempting to register additional cards.
- Unrealistic spending patterns that do not align with the player’s demographic profile.
- Attempts to open multiple accounts to bypass deposit or loss limits.

Procedures for Player Identification and Intervention

Operators must have a structured process for responding to problem gambling behaviour identified.

This process includes:

1. Player Profiling and Risk Assessment

- Operators must establish player profiles with relevant data points to assess individual risk levels.
- Behavioural risk factors should be continuously monitored, with real-time alerts for concerning activity.

2. Direct Player Interaction

- When concerning behaviour is identified, the operator must initiate direct contact with the player via trained responsible gaming professionals.
- This interaction should be documented within the operators Player Account Management system, including indicators of concern and actions taken.

3. Responsible Gaming Interventions

- Players exhibiting at-risk behaviour must be informed about responsible gaming tools, including deposit limits, time-outs, and self-exclusion.
- Operators must have clear guidelines for escalating concerns, which may involve:

- Applying deposit limits to the player's account.
- Temporarily suspending access pending further review.
- Excluding the player in cases of extreme risk.

Training and Staff Readiness

- Operators must train customer service and responsible gaming staff to handle player interactions professionally and effectively.
- Training should cover:
 - Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation).
 - Conducting sensitive and structured conversations with at-risk players.
 - Directing players to appropriate support resources and responsible gaming tools.
 - Ensuring all interactions are documented for compliance and follow-up action.

Escalation

Any problematic behaviour identified must be escalated to the Compliance Officer or Responsible Gaming officer who must assess each case and determine whether further restrictions, exclusions, or responsible gaming interventions are necessary.

Cooling Off

The operator must ensure that the cooling-off period is easily accessible, immediate, and free from interference. In the event that technical or platform adjustments are required to implement this as a new feature on the platform, the operator will need to provide this service manually until a technological solution is available.

Availability and Accessibility

The operator must offer players the option to activate a 24-hour, a 7-day, 1 month or 3 month cooling-off period, during which they are temporarily restricted from gambling. The cooling-off

period must be clearly displayed on the website and accessible via a single-click button, without requiring email communication or approval from the operator.

Cooling-off may be selected by the player by any combination of one, more or all of the product verticals offered by the operator (for example Slots, Table Games, Fixed Odds Betting, Poker and other P2P games).

Immediate Activation and Restrictions

Once a player selects the cooling-off option:

- The player must be made aware of the difference between Cooling Off period and Self-Exclusion and must be offered the opportunity to proceed directly to Self-Exclusion if they so choose.
- It must take effect immediately.
- The player's account must be locked, preventing any participation in gambling activities for the full period selected by the player.
- The player must be given the option to enhance their own protection by opting-out of the marketing database during their cooling-off period.

The operator must not discourage players from activating the cooling-off period by:

- Questioning their decision.
- Offering reassurances to delay the process.
- Providing bonuses or promotions as incentives to continue playing.

Reactivation and Additional Time-Out Options

After the cooling off period has expired, the player's account must be automatically reactivated, allowing them to resume gameplay without needing further action.

Self-Exclusion

The operator must implement a clearly defined and documented self-exclusion program that is easily accessible and ensures immediate action upon a player's request. This tool is designed to help individuals regain control over their gambling behaviour and prevent further harm.

The operator must retain records of self-excluded players in a dedicated Self-Exclusion Register for a minimum of seven years from the end of a player's exclusion period. Additionally, any known payment method used by a self-excluded player must be blocked for future use during any exclusion period to prevent circumvention of restrictions.

Self-Exclusion Process and Requirements

Accessibility and Communication

- The operator must prominently display the self-exclusion option on the website, ensuring that players can easily locate and activate it.
- Information about self-exclusion must clearly outline.
 - The steps required to self-exclude.
 - The duration options available.
 - The benefits of self-exclusion, including its role in preventing problem gambling.

Immediate and Irreversible Action

- Players must be able to initiate and complete the self-exclusion process fully online, without requiring email communication or operator approval.
- Self-exclusion steps must be concise and easy to understand, taking no more than 15 minutes to complete.
- The operator must have measures in place to identify duplicate accounts and prevent self-excluded individuals from creating new accounts under different credentials.
- A player who self-excludes must also be excluded from all the operator's domains and the player should be encouraged to self-exclude from other gambling sites.

Self-Exclusion Periods and Restrictions

In accordance with Clause 5.4(2) of the LOK, operators must offer a long-term self-exclusion periods of 1 year, with additional options for 3 years, 5 years, 10 years, and lifetime exclusion

- Once a self-exclusion request is submitted, it must take effect immediately.
- The operator must not discourage self-exclusion by questioning the player's decision, offering reassurances, providing bonuses, or delaying the process in any way.
- Once self-exclusion is confirmed, it cannot be revoked by the player before the exclusion period ends.

- Self-exclusion may be selected by the player by any combination of one, more or all of the product verticals offered by the operator (for example Slots, Table Games, Fixed Odds Betting, Poker and other P2P games).

Financial and Account Management

Upon activation of total self-exclusion of all verticals:

- All gambling-related transactions must be blocked immediately.
- The player's account must be deactivated, preventing further play.
- Excepting any funds frozen in accordance with the AML policy any remaining funds in the player's account must be refunded to the original payment method within two business days (subject to AML policy requirements).
- The operator must permanently remove the player's data from all marketing and promotional lists.

Upon activation of self-exclusion of one or more (but not all verticals)

- Game play and wagering must be totally restricted in accordance with the player's preferences.

Reactivation and Post-Exclusion Protocol

After the self-exclusion period ends, the operator must require the player to confirm in writing their request before unblocking the account. In addition the operator must provide a message regarding responsible gaming, remind the player of the safeguards that are in place and encourage the player to complete gambling anonymous questionnaire. The player's gaming history must be preserved, and the account must be restored only under their original credentials.

Marketing and Contact Restrictions

During and after the self-exclusion period (for one or more or all verticals):

- The operator must not contact the self-excluded player under during the period of exclusion, excepting any third party, legal or other non-marketing messaging required.
- The operator must not send promotional materials or encourage the player to resume gambling by offering free play, bonuses, or any other incentives.
- Cooling off periods end automatically, however after Self Exclusion the decision to resume play must be entirely initiated by the player.

Compliance and Regulatory Obligations

The operator must document all self-exclusion activities and actions in real time. The CGA may request these records at any time to ensure compliance.

If a self-excluded individual or minor is found to have accessed gambling beyond their self-exclusion choices, the operator must:

- Excepting any funds frozen in accordance with the AML policy refund all deposited amounts to the player within two business days.
- Immediately block the player's account to prevent further play.
- Submit a detailed report to the CGA within five working days, outlining how the issue occurred and what actions are being taken to prevent recurrence.

Operator-Initiated Exclusion

The operator may exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour.
- The player attempts or engages in criminal activities through the operator's platform.
- Operator-initiated exclusions must be formally documented, and records must be kept for at least five years. The CGA may request these records at any time.

Limits

The operator must offer the player with tools to control their gambling activity by setting deposit limits. Players can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

Players can make their limits more stringent at any time, and such changes take effect immediately. However, any request to ease a limit will be subject to a mandatory waiting period before taking effect, ensuring that decisions are made with due consideration.

Deposit Limits

- Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).
- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.

- Any request to reduce a deposit limit takes effect immediately, while requests to increase a limit are subject to a seven-day waiting period before implementation.

Other Limits

In line with the operators target player and/or market, other limits may be considered including loss limits, time limits or wager limits.

Exceptions to Limits and Exclusions

A limit or exclusion has the potential to affect active wagering – including, but not limited to:

- A time limit set when a player is active in a poker tournament.
- A limit or exclusion when a player has an unresolved ante-poste bet on a future event.

In these situations the restrictions as outlined above must be honoured immediately with the exception of the active gameplay or wager(s). Upon completion of the relevant tournaments, wagers or events the restrictions apply.

Reality Check

Reality check measures include, but are not limited to:

1. A real-time session timer that remains visible at all times while the player is logged in.
2. Player-Activated Reality Checks. Players may have the option to set customized reality check alerts at specific time intervals. When triggered, it requires the player to confirm that they have read the message before resuming play and offers the option to end the session or continue playing.

Customised Reality Checks must suspend play momentarily and required the player to confirm they have read the message before resuming play.

Custom messages may include

- Clearly indicate how long the player has been playing.
- Display the player's winnings and losses during that period.

Marketing and Advertising

The operator is responsible for ensuring that all marketing, promotional, and advertising activities adhere to responsible gaming principles. Direct marketing activities (including emails, messaging, bonuses or incentives) are prohibited during an active cooling off or self-exclusion period.

Advertising must not mislead, encourage excessive gambling, or target vulnerable individuals.

Additionally, the operator must ensure that all business partners, including affiliates, influencers (social media or otherwise), VIP representatives, and marketers, comply with the responsible gaming framework and applicable advertising regulations.

Advertising and Marketing Guidelines

Advertising and Marketing Restrictions

Operators must not engage in misleading, excessive, or irresponsible advertising. The following restrictions apply to all forms of marketing and advertising:

- No Aggressive or Misleading Tactics – Advertising must not be excessive, deceptive, or aggressive in nature.
- No Targeting of Vulnerable Groups – Marketing and promotions must not target or appeal to self-excluded players, individuals with gambling problems, minors, or financially vulnerable people.
- No Portrayal of Gambling as an Investment – Advertising must not promote gambling as a way to achieve financial success or solve financial difficulties.
- No Misrepresentation of Skill vs. Chance – Marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
- No Emotional Manipulation – Advertising must not portray gambling as a means of escaping stress, depression, loneliness, or other personal struggles.
- No Child-Friendly Content – Cartoons, animations, and visuals that appeal to children or minors must not be used.
- Operators must not use social media influencers, celebrities, or entertainers who appeal to minors in any marketing campaign.
- Marketing materials must not feature minors or depict them engaging with gambling content.
- No Sexual or Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.

- No Association with Unrelated Harmful Behaviours – There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.
- Bonus Conditions
 - Bonuses and promotions must be communicated transparently with clear terms and conditions.
 - Operators must not encourage excessive gambling through aggressive bonus promotions.

Responsible Gaming Commitments in Consumer Advertising

In addition to the measures above, the operator may consider implementing one of the following regarding consumer advertising:

- Responsible Gaming Messaging – All advertising must include a clearly visible responsible gaming message or slogan.
- Offline Advertising – Regardless of the requirements of the CGA or the LOK, all advertising on any media or platform must adhere to the code of conduct of that media outlet that vis-a-vis responsible gambling messaging and practices.
- Online and Social Media
 - Operators must enforce clear guidelines to ensure online advertising does not target vulnerable groups.
 - All social media gambling advertisements must be age-gated and explicitly identified as content from a gambling operator.
- Direct Marketing – The operator must implement strict protocols to ensure that all direct marketing campaigns (emails, SMS, push notifications) emphasize responsible gambling and exclude self-excluded players or those who have set gaming limits.
- Affiliate Advertising – The operator is responsible for ensuring that all affiliates comply with responsible gaming standards. This must be enforced through binding contracts, compliance audits, and penalties for non-compliance.
- Social Media Influencers
 - The operator is responsible for all actions and statements of any social media influencer pertaining to the operator business, whether or not the influencers actions and/or statement are paid placement or advertisement.

- Social Media Influencers representing the operator must be of-age, with a target audience that does not include vulnerable individuals (as defined above) and not be involved in sexually provocative activities.
- Sponsorships
 - Sponsorship agreements must not appeal to vulnerable individuals, particularly minors.
 - Operators must ensure that branding or promotional material does not appear on youth sports equipment or at events targeted at minors.
 - All sponsorship content should include responsible gambling messages.

Consultation Period.

In accordance with LOK clause 12.1 this policy is open for feedback and consultation. Please send any notes for the CGA to consider by email to onlinegaming@gcb.cw on or before March 5th 2025.

Amendments or changes made will at the discretion of the CGA.