



Responsible Gaming Policy for Licensed Operators

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1 Definitions

CGA means Curacao Gaming Authority.

Cooling Off means a pre-determined period that can comprise hours, days or months which is set by the player during which time the player may not place any wagers whatsoever.

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.

Minor means any person under the age of 18

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.

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.

2 Policy Overview

The CGA is committed to fostering a safe, transparent, and fair gaming environment.

2.1 General Responsible Gaming Policy

Online gaming providers must integrate Responsible Gaming principles into their business models, ensuring that gambling remains an enjoyable form of entertainment rather than a source of harm. The policy must include proactive steps and processes to protect Vulnerable Persons, promote responsible gambling along with mitigation or prevention of problem gambling behaviour. This includes:

- Clear Responsible Gaming policy that is easily available to the players.
- Provision of Responsible Gaming tools and information resources to players.
- Monitoring mechanisms must be in place to detect and address problematic gambling behaviour.
- Compliance with all regulatory reporting and auditing obligations.

Operators must upload their Responsible Gaming policy to the CGA portal for CGA evaluation.

As a general principle no credit can be offered to players for the purpose of wagering.

Adherence to this Responsible Gaming policy is considered a requirement under the LOK, and failure to comply will be addressed by the Curacao Gaming Authority (CGA) in accordance with its monitoring and enforcement procedures.

2.2 High Risk Business Model

The CGA expects that those operators whose business model is entirely or partially high risk including but not limited to skin betting, agent/intermediary accounts, cryptocurrency, or high rollers/VIPs to provide a policy that suitably accommodates those elements of the business that are high risk.

2.3 Non-Retail Model

This policy does not apply to non-retail gaming and betting including but not limited to professional players or syndicates. General Responsible Gaming principles apply in line with such business models.

3 Mandatory Requirements

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

1. Age verification (Section 5)
2. Information accessibility (Section 6)
3. Player self-assessments (Section 7)
4. Behaviour tracking (Section 8)
5. Cooling-off Periods (Section 9.1)
6. Self-exclusion (Section 9.2)
7. Deposit limits (Section 10.1)
8. Consumer Advertising and Marketing (Section 12)
9. Training of employees (Section 11)

This policy requires that the operator will appoint someone which fulfils the Responsible Gaming role in the organization. Unless/until there is a person dedicated to Responsible Gaming endeavours, a Compliance Officer (not AML/CFT) is responsible for implementing and enforcing the Responsible Gaming policy and whoever fulfils the role must provide a report to the operator's management team ,at least once every twelve (12) months as to the effectiveness of the policy and related operational procedure. This report shall provide recommendations to management as to any proposed operational or policy enhancements. Any material changes to the Responsible Gaming policy must be reported to the CGA.

4 Implementation Schedule

Measure	Section	End Apr-25	End May-25	End Sep-25	End Mar-26	End Sep-26
Marketing & advertising cannot knowingly and deliberately target vulnerable persons	12	X				
Terms & Conditions should be visible and clear	6.3		X			
Responsible gambling policy: The document must be submitted to the CGA	2		X			
Management team to be aware of RG policy and its implementation	2		X			
Designate suitably qualified Responsible Gaming tasks to a person within the operator's online business	2		X			
Information Accessibility: Prominent display of information regarding responsible gambling and gambling addiction in English, as well as the language of the target market, including information on the website that gambling is prohibited for minors (under 18 years old)	6		X			
Gambling support referral: A prominent display of gambling treatment options in the target market, including local and/or international problem gambling support websites	6		X			
Marketing & promotions (other than vulnerable persons)	12			X		
Age verification: prohibition of gambling by self-excluded individuals and minors on the website	5.1 5.2			X		
Self-exclusion option must be functional and meet all requirements (offering at least 1-year Self-exclusion period to players)	9.2			X		
No credit offering for wagering	2.1			X		
RG message on all advertising (mandatory)	12			X		
Behaviour tracking and procedures for player identification and interventions must be functional	8				X	
Safer gambling tools. Deposit limits	10.1				X	
RG training of staff with customer interaction (i.e. Customer support and VIP at a minimum and marketing)	11				X	
Cooling-off option must be available to players	9.1				X	
Player self-assessments must be available to players	7				X	
Exclusion by the operator must be functional	9.2					X
Other RG tools as necessary based on risk profile: for example, Reality Check, time limit.	13					X

5 Prevention of underage gambling

5.1 Age verification

According to Article 1.4(d) of the LOK, it is prohibited for the gambling licence holder to allow a minor the opportunity to participate in games of chance.

Operators must therefore implement rigorous age verification processes to ensure that all participants are of legal gambling age.

During the account registration process, the operator must verify that the player is not a minor. This begins with self-attestation, where the player is required to enter their date of birth and confirm they are over 18 by selecting a designated checkbox and additional checks must be carried out to gain sufficient certainty that the individual is not a minor.

If at any point, notwithstanding the checks put in place, the operator becomes aware that the player is a minor, the account must be closed immediately. The civil law implications of this action must be considered. These may include the obligation to refund all deposits made by the player and the forfeiture of any winnings. The operator must clearly communicate the reason for the account closure to the minor.

Regardless of the above, proof of age document submission and checks are 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) on reaching specified thresholds and in any case prior to first withdrawal.

Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification, may be undertaken by the operator at its own discretion, but do not supersede the government-issued document requirement.

Operators must maintain records of all age verification processes and their outcomes. These records must be made available for regulatory review.

6 Player Information and Accessibility

6.1 Responsible Gaming Section

At all times operators must ensure that a distinct Responsible Gaming Section (the “RG Section”) is available for players.

The RG section must

- Be clearly identifiable and accessible.
- Contain easily understandable information so that player can make informed choices.
- Include direct access to all relevant tools a player may use to manage their gaming behaviour including, but not limited to, self-exclusion, cooling-off period, limit setting and other Responsible Gaming measures.
- Display information about how the player may contact the operator regarding any Responsible Gaming concerns via email or chat.
- The RG Section must be made available in English and the language of the target market. At all times the English version takes precedence if there are discrepancies.

6.2 Homepage Accessibility

- A clear and visible link to the RG Section must be present on the website or app homepage.
- Display information about how the player may contact the operator regarding any Responsible Gaming concerns via email or chat.

6.3 Terms & Conditions Inclusion

- The RG Section 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.

6.4 Footer Information Requirements

The footer of the homepage of the gaming website or application 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 RG Section
- The operators CGA digital seal.
- A direct link to one or more gambling addiction support resources such as Gamcare, Gamblers Anonymous, Gambleaware. In addition to international support resources, information and links to local support sites (where available in the target market) can also be provided.

7 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 of at least the last six months, without prejudice to retention periods required by other applicable laws and regulations. Longer periods of transactions may be requested from the operator and must be provided within 10 working days. If the operator can show that this timeframe is not reasonably achievable given the circumstances, CGA may grant an extension for a period it deems appropriate.

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.

8 Behaviour Tracking

Active monitoring detects signs of problematic gambling and clear intervention strategies for high-risk players in order to mitigate harm. Article 1.4(e) of the LOK prohibits the operator to give a person who can reasonably be assumed to be a vulnerable person the opportunity to play games of chance.

By holistically analysing the player's relationship with the operator, the operator can identify at-risk individuals and take proactive steps to prevent gambling-related harm.

Key monitoring factors are outlined in section 8.1 below, however it is recognised that any single/individual factor shall not necessarily, by itself, classify a player as a potential gambling addict. A determination of problematic gambling behaviour may require the presence of multiple indicators occurring simultaneously and consistently.

Behaviour tracking is typically undertaken by frontline staff (such as customer service representatives 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 frontline 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).

8.1 Key monitoring factors

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- A pattern of Inexplicable extended play sessions.
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period.
- Players maxing out a credit card.
- Attempts to open multiple accounts to bypass deposit or loss limits.

8.2 Procedures for Player Identification and Intervention

Operators must have a structured and documented process for responding to identified indicators of problem gambling. This process must include the following components:

8.2.1 Player Profiling and Risk Assessment

- Operators must establish and maintain player profiles incorporating relevant data points to assess individual risk levels.
- A risk-based approach must be adopted to determine the appropriate level of monitoring and intervention.
- All Responsible Gaming interactions—whether initiated by the player or the operator—must be recorded in the Player Account Management (PAM) system, along with the indicators of concern and any actions taken.

8.2.2 Responsible Gaming Interventions

- Players identified as exhibiting at-risk behaviour must be informed of the Responsible Gaming tools available, such as deposit limits, cooling off, and self-exclusion options.
- Operators must follow a clear escalation protocol where appropriate, which may include:

- Applying mandatory deposit limits to the player's account.
- Temporarily suspending the account pending further assessment.
- Permanently excluding the player in cases of severe or persistent risk.
- Under no circumstances may an operator use Responsible Gaming measures as a pretext to prevent or delay legitimate player withdrawals. Any misuse of protective interventions for financial gain will be considered a breach of licence conditions.

9 Cooling off and Self-Exclusion

Operators must implement and maintain effective processes and tools that empower the player to manage their own gambling behaviour.

Two key mechanisms must be made available to players at all times via the RG Section of the website or app:

- **Cooling Off:** A short-term, temporary restriction from gambling activities, which the player can customize.
- **Self-Exclusion:** A long-term, irrevocable exclusion from all gambling activities under the operator's licence.

Players must not be guided or influenced toward one option over another. No interference, bonuses, or reassurances may be provided.

Players must be clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable.

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

Antepost bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing messages	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. Operator should have a plan to fully automate this process in short term.
Reactivation	Automatic	Player initiated

9.1 Cooling Off

9.1.1 Overview

The operator must offer players the option to activate a cooling-off period, during which they are temporarily restricted from gambling activity. The options regard:

1. Duration
2. Brand: (includes both the primary and any mirror domains of that brand)
3. Vertical
4. Marketing Opt-Out

The Duration and Marketing Opt-Out categories are mandatory. Inclusion of the Brand and Vertical categories are at the discretion of the operator.

- Duration Only: Restriction on all wagering activity for the period selected on the brand where the restriction was initiated.
- Duration, Vertical and Brand: Restrictions as selected, on brands selected, on verticals selected.

The player must select (by tick-box) their preference in each of these categories. Tick-boxes must not be pre-checked.

9.1.2 Duration Options

- 24 hours
- 7 days
- 1 month
- 3 months

9.1.3 Vertical Options

- ALL gambling activity
- Restriction on individual product verticals offered by the operator (for example Casino, Fixed Odds Betting, Poker and other P2P games). Casino may be sub-categorised as All Games or Slots Only.

9.1.4 Brand Options

- The current brand (website and/or app)
- All of the operator's brand

9.1.5 Marketing

- Opt-out.

9.1.6 Actions and Implementation

9.1.6.1 Timing

The restrictions must take effect **immediately** and be enforced according to the player's selections.

The operator must not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The operator may incorporate a verification check for the elected periods of 1 or 3 months for the player to confirm the decision to take a break from gambling during the selected cool-off period, but such checks should be online only and neutrally expressed e.g. "You wish to cool off for one month. Please confirm".

9.1.6.2 Player Account

- Player funds remain accessible for withdrawal.
- Account remains active but with gambling features disabled.

9.1.6.3 Marketing and Communications

- Marketing materials must not be sent to players during their Cooling Off period if they have opted out.
- No bonuses, free play, or incentives may be offered during the cooling-off period.

9.1.7 Reactivation and Post-Cooling Off Protocol

- Accounts must be automatically reactivated after the selected Cooling Off period expires.
- No further action is required by the player.

9.2 Self-Exclusion

9.2.1 Overview

The operator must offer players the option to self-exclude from all gambling activity.

1. Duration: In accordance with LOK clause 5.4(2) operators must offer a long-term self-exclusion periods of at least 1 year.
2. Brand: All brands/domains operated under the operator's license.
3. Vertical: All gambling activity
4. Marketing: Automatic opt-out

The player must select (by tick-box) their preference as to the duration of the self-exclusion period, all the other elements are automatic.

With regard to the self-exclusion process(s) offered by the operator, at the very least the player must be able to initiate and complete the self-exclusion process fully online, without requiring email communication or operator approval.

9.2.2 Duration Options

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

9.2.3 Actions and Implementation

9.2.3.1 Timing

The restrictions must take effect **immediately** and be enforced according to the player's selections.

The civil law implications must be considered and may entail that any wagering that takes place following the self-exclusion request and prior to it being in effect must be voided and funds must be returned to the player.

The operator must not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The operator may implement one simple verification check to ensure that the player is aware they have chosen to self-exclude and understands the consequences of this decision. The verification should be conducted online, and be brief and straightforward. The wording should be neutral, for example: "You have chosen to self-exclude for 5 years. Please confirm".

Player Account

- Account is closed. Player can no longer log-in.
- The operator must have robust measures in place to identify where reasonably possible duplicate accounts exist and prevent self-excluded individuals from creating new accounts under different credentials.
- The civil law implications must be considered. These may include that any ante-post bets must be voided and refunded, subject to AML/CFT regulations.
- The player must complete any tournaments (for example poker tournament) that is in-running at the time of the self-exclusion.
- Contributions to progressive jackpots that were made by the player through gameplay prior to the self-exclusion request remain in-situ, but the player is no longer entitled to participate with the jackpot after the self-exclusion is in effect.

9.2.3.2 Marketing and Communications

- No direct marketing or advertising can be sent to the player.

9.2.4 Reactivation and Post-Cooling Off Protocol

- After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account. The written request can be prompted at the point of the player attempting to log in after the exclusion period has ended or by unprompted written communication by the player via the official customer support channels. Reactivation cannot be instigated by the operator re-commencing communications with the player. Activation of a self-exclusion by a player is irreversible and irrevocable for the duration of the exclusion period selected.
- The operator must retain records of self-excluded in accordance with the applicable retention periods. Additionally, where possible, and in line with surrounding regulations, any payment

method known directly by the operator used by a self-excluded player must be blocked for future use during any exclusion period to prevent circumvention of restrictions.

9.3 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.
- Operators may not exclude players solely on the basis of the amount of their winnings.

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.

10. 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.

10.1 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.
- If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.
- Any resolved or unresolved wagers made prior to the deposit limit being set in place remains unaffected regardless of the limits set.

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 active gameplay, relevant

tournaments, wagers or events the restrictions apply. Prior to the event's completion, no further wagering is permitted – for example a player cannot enter another tournament or engage in other gameplay while the current tournament remains in progress, or a player may not place any wagering while an ante-post bet remains unresolved.

11 Training and Staff Readiness

Operators must train customer service and Responsible Gaming staff to handle player interactions professionally and effectively.

Training should cover, at least:

- 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.

12 Consumer Advertising and Marketing

Operators must not engage in irresponsible advertising.

- No Targeting of Vulnerable Groups – Marketing including visual content must not directly target 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 substitute for financial, emotional, or mental well-being
- Marketing materials must not feature minors or depict them engaging with gambling content.
- No Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
- No Encouragement of 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 use bonuses to encourage excessive gambling.
- Third Party Involvement

- The operator is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors social media influencers, including wordings and visual representations, where the influencers actions and/or statement are paid placement or advertisement.
- The operator must make any contracted third-party aware of their Responsible Gaming policy and require them to adhere to it.
- Responsible Gaming Messaging – All advertising must include a clearly visible responsible gaming message or slogan.

13 Enhanced Responsible Gambling measures

Based on higher levels of risk in its business model, the operator may decide to implement enhanced measures regarding responsible gambling. Higher levels of risk may be due to the business model being inherently high risk – see paragraph 2.2, or because of a disproportionately high number of an operator's players being assessed to be at risk either due to operator led checks or the numbers of players choosing to exclude/cool-off.

13.1 Internet Filtering Tools

To further prevent underage gambling, the operator is advised to 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 (some paid, some free) are examples that are available for website blocking and gambling site blocking in particular:

BetBlocker – betblocker.org

GamBlock – gamblock.com

Gamban – gamban.com

13.2 Direct Player Interaction

- Operators may employ automatic or manual pop-up notifications in response to concerning behaviours. These notifications must include a link for the player to contact a trained Responsible Gaming professional.
- When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the operator must initiate direct contact. This communication must advise the player to review the Responsible Gaming area and consider using the available tools and support services.

13.3 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.

13.4 Reality Check

Reality check measures are varied, and if used the operator can implement these measures without compromising the user experience. However, if used they must be fit-for-purpose and 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. A real-time clock in the players time zone.
3. Periodic pop-up reminders or prompts about session duration.
4. 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 require 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.