NIISITAPI
GAMING COMMISSION

Responsible Gaming Policy for B2C Licensed Operators

Document control

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1. Purpose, authority and status

1.1 Purpose

The Niisitapi Gaming Commission (the "Commission") is committed to a safe, transparent and fair gaming environment. This policy sets the minimum responsible gaming standards that every Operator must meet, so that gambling remains a form of entertainment and gambling-related harm is prevented, detected and reduced.

1.2 Authority and effect

This policy is issued by the Commission under Regulation 46 of the Online Gaming Regulations (the "Gaming Regulations") and gives effect to the player-protection requirements in Regulation 18. Compliance with it is a condition of every License to which it applies (Regulation 46.3). Failure to comply will be dealt with under the Commission's monitoring and enforcement procedures (section 17).

1.3 Who must comply

- Every B2C Licensee (an "Operator"), for all brands, domains, apps and gambling products offered under the License.
- Operators are responsible for compliance by anyone acting for them, including affiliates, agents, sponsors, influencers and contracted service providers.

1.4 Scope limits

This policy applies to non-retail gaming and betting, such as professional players or syndicates, only to the extent appropriate to that business model.

1.5 Proportionality

The mandatory requirements apply to every Operator. Operators must apply them in a way that reflects their target markets and players.

1.6 Relationship to other instruments

This policy is to be read with the Gaming Regulations, the Commission's AML/CFT/CPF Code of Practice (the "AML Code"), which is the AML Policy under the Gaming Regulations, and its Player Complaints Policy. If there is a conflict, the Gaming Regulations prevail, and a mandatory provision of applicable law prevails over both (Regulation 47).

2. Definitions

Term	Meaning
Commission	The Niisitapi Gaming Commission.
Operator	A B2C Licensee under the Gaming Regulations.
Remote Gaming	Has the meaning in the Gaming Regulations.

Term	Meaning
Minor	Any person under 18 years of age, or under any higher minimum age that applies by law (Regulation 18.1(b)).
Vulnerable Person	A person under 18 (or under any higher minimum age that applies by law); a person with no or insufficient control over their gambling who is, or threatens to become, addicted and may harm themselves or others; a person excluded from gambling by a court, authority or Operator, or at their own request; or a person declared bankrupt.
Cooling-off	A period chosen by the player, of 24 hours up to 3 months, during which the player cannot place wagers. The player can still log in and withdraw.
Self-exclusion	A voluntary, long-term bar on all gambling with an Operator, for a minimum of one year, which the player cannot cancel during the term.
Operator-initiated exclusion	An exclusion imposed by the Operator as a high-risk intervention (section 11).
Marketing	All resources, messages and media that promote an Operator's domains, brands, products or services, including print and other media advertising, content marketing, digital marketing and social media campaigns.
Vertical	A product category offered by an Operator, such as casino, fixed-odds betting or poker and other peer-to-peer games.
RG Section	The dedicated Responsible Gaming area of an Operator's website and app (section 7).
PAM	The Player Account Management system in which an Operator keeps player accounts and records.
Mandatory requirements	The basic responsible gaming elements that every Operator must implement (section 4).
Gaming Regulations	The Online Gaming Regulations.
AML Code	The Commission's AML/CFT/CPF Code of Practice, which is the AML Policy under the Gaming Regulations.
Player Complaints Policy	The Commission's Player Complaints Policy for Licensed Operators, as amended. It defines "Responsible Gaming Complaint".
MLRO	The Money Laundering Reporting Officer, as defined in the Gaming Regulations and the AML Code (Part VI.3).
Go-live date	The date on which an Operator first begins accepting players or wagers under its License (the "Commencement of Operations" in the Gaming Regulations).

3. General requirements

3.1 Responsible gaming in the business model

Operators must build responsible gaming into their business models. Their policy must include proactive steps to protect Vulnerable Persons, promote responsible gambling and prevent or reduce problem gambling. Operators must:

- have a clear responsible gaming policy that is easy for players to find;

- give players responsible gaming tools and information resources;
- have monitoring in place to detect and address problematic gambling behaviour;
- handle player complaints, including Responsible Gaming Complaints, under the Player Complaints Policy; and
- meet all regulatory reporting and audit obligations.

3.2 Submission of the operator's policy

Each Operator must submit its responsible gaming policy to the Commission for evaluation and must keep it consistent with this policy. Annex A lists what the Commission expects the Operator's policy to contain.

3.3 No credit

As a general principle, Operators must not offer players credit for the purpose of wagering, whether directly or through a third party. Promotional or bonus value that the Commission has expressly permitted, and that is clearly distinguished from withdrawable player funds, is not credit (Regulation 19.9).

3.4 Higher-risk business models

Operators whose business model is wholly or partly high risk, including skin betting, agent or intermediary accounts, Virtual Assets, and high roller or VIP services, must provide a policy that suitably covers those elements and apply the enhanced measures in section 15 where they are relevant.

4. Mandatory requirements and governance

4.1 Mandatory elements

Every Operator must implement the following elements as a condition of its License.

No.	Element	Section
1	Age verification	6
2	Player information and accessibility	7
3	Account history and self-assessment	8
4	Behaviour monitoring and intervention	9
5	Cooling-off	10
6	Self-exclusion	10
7	Deposit limits	12
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4.2 Responsible person

Each Operator must appoint a person to carry out the responsible gaming role. Until a person is dedicated to the role, the Compliance Officer (or the director performing that function under Regulation 13.3), who must not be the MLRO, is responsible for implementing and enforcing the Operator's responsible gaming policy. Where the Commission designates the responsible gaming role as a Key Person function, the appointment, replacement, resignation or removal of the person in the role must be notified promptly to the Commission (Regulation 13.1(q)).

4.3 Annual report to management

The person in the role must give the Operator's management team a report at least once every twelve months on how effective the policy and related operating procedures have been. The report must include recommendations for any operational or policy improvements. The report must draw on Responsible Gaming Complaints data (Player Complaints Policy). Management must be aware of the policy and how it is implemented.

4.4 Changes to the operator's policy

Operators must report any material change to their responsible gaming policy to the Commission within 30 calendar days of the change taking effect.

5. Effective date and implementation

There is no transition period. The requirements of this policy apply in full to every Operator from the effective date, and an Operator that goes live after that date must comply in full from its Go-live date. This reflects Regulations 10.5 and 18 of the Gaming Regulations, under which a Licensee, including a holder of a Provisional License, must maintain player-protection measures from the commencement of operations.

Measure	Section	Implement by
All requirements of this policy, including the mandatory elements in section 4.1	All	The effective date, or the Go-live date if later
Responsible gaming policy submitted to the Commission	3.2	With the application for a License (Regulation 6.2 and the Application Guidelines); for an Operator already holding a License, the effective date
Enhanced measures for higher-risk business models	3.4, 15	The effective date, or the Go-live date if later, where they apply to the Operator's risk profile or the Commission directs

6. Prevention of underage gambling

6.1 Duty

A Licensee must not allow a Minor to take part in Remote Gaming (Regulation 18.1(b)). Operators must therefore run robust age verification so that everyone who gambles is of legal age, and must prevent both Minors and self-excluded persons from gambling on their platforms.

6.2 Registration

At registration, the Operator must verify that the player is not a Minor. This starts with self-attestation: the player enters a date of birth and ticks a checkbox to confirm they are 18 or over (or the higher legal age in their jurisdiction). The Operator must also carry out additional checks to reach sufficient certainty that the person is not a Minor.

6.3 Identity documents

- Proof-of-age checks follow the Commission's Know Your Customer and AML requirements in the AML Code (Parts IV.2.1 and IV.3).
- At a minimum, the Operator must verify a valid government-issued ID (such as a passport, national ID or driver's licence) when the CDD Threshold in the AML Code (EUR 3,000, or the equivalent in another currency) is reached, and in every case before the first withdrawal.
- Secondary methods, such as electronic verification, payment validation, third-party or government database checks and selfie verification, may be used at the Operator's discretion but do not replace the government-issued document requirement.

6.4 If a Minor is identified

If the Operator becomes aware at any point that a player is a Minor, despite its checks, it must close the account immediately and clearly tell the Minor why. The Operator must consider the civil law consequences, which may include refunding deposits and forfeiting winnings.

6.5 Records

Operators must keep records of all age verification checks and their outcomes and make them available to the Commission for review.

7. Player information and accessibility

7.1 Responsible Gaming Section

Operators must provide a distinct Responsible Gaming Section ("RG Section") at all times. It must:

- be clearly identifiable and easy to reach;
- contain clear, easy-to-understand information on the risks of gambling, so players can make informed choices;
- give direct access to every tool a player can use to manage their gambling, including self-exclusion, cooling-off, limit setting and any other measures offered;
- explain how to contact the Operator by email or chat about responsible gaming concerns, and accept Responsible Gaming Complaints under the Player Complaints Policy and pass them on immediately; and

- be available in English and in the language of the target market. If the versions differ, the English version prevails.

7.2 Homepage

- The homepage of the website or app must show a clear, visible link to the RG Section.
- It must also show how the player can contact the Operator about responsible gaming concerns by email or chat.

7.3 Terms and Conditions

- The RG Section must be expressly referred to and included in the Terms and Conditions.
- The Terms and Conditions must be no more than one click from the homepage.
- Players must be told what responsible gaming tools are available, how they work and how to use them.

7.4 Homepage footer

The footer of the homepage must show:

- a clear indication that under-age gambling is prohibited;
- the name and registered address of the Licensee;
- the License number issued by the Commission;
- a statement that the Operator's activities are overseen by the Commission;
- a link to the Commission's digital seal (Regulation 22.3);
- a link to the RG Section;
- a link to the Complaints Procedure Statement (Player Complaints Policy); and
- a direct link to at least one gambling addiction support resource, such as GamCare, Gamblers Anonymous or GambleAware. Links to local support sites should also be shown where they exist in the target market.

8. Account history and self-assessment

8.1 Account history

Operators must let players see a detailed record of their betting and wagering history, with timestamps, for at least the last six months in their player account. Longer periods must be provided on request within 10 working days. If the Operator can show that this is not reasonably achievable in the circumstances, the Commission may grant an extension it considers appropriate. Other retention periods required by law are not affected.

8.2 Self-assessment

Operators must encourage players to check regularly whether their gambling is within healthy limits, by providing self-assessment tools made up of questions that help identify possible problem gambling. The tool may be a widely used quiz such as the Gamblers Anonymous 20 questions, or another scientifically recognized screening tool, for example the CAGE questionnaire adapted for gambling (Annex A, Part 2).

Operators must recommend that any player who recognizes problematic gambling behaviour through self-assessment explores the responsible gambling tools available.

9. Behaviour monitoring and intervention

9.1 Duty

Operators must actively monitor player behaviour to detect signs of problem gambling and must have clear intervention steps for high-risk players. An Operator must not give a person who can reasonably be assumed to be a Vulnerable Person the opportunity to gamble.

9.2 Approach

- Operators must look at the player's overall relationship with the Operator, so that at-risk individuals can be identified and helped before harm occurs.
- No single factor on its own necessarily makes someone a problem gambler. A finding of problematic behaviour may need several indicators occurring together and consistently.
- Behaviour tracking is normally carried out by frontline staff, such as customer service and VIP managers, who are best placed to see patterns and hear what players say. Operators may also use technology, including platform and in-game tools, artificial intelligence and machine learning.
- Operators' responsible gaming policies must include a structured process for flagging potential vulnerable players, which triggers a more detailed analysis of their behaviour.
- Monitoring and profiling must comply with data protection requirements (Regulation 35).

9.3 Minimum indicators

Operators must at least consider these indicators:

- sudden, unexplained increases in deposit or wagering frequency, or in gaming sessions;
- repeated failed transactions due to insufficient funds;
- players repeatedly cancelling withdrawal requests;
- a pattern of inexplicably long play sessions;
- unreasonably increased contact with customer support, including bonus requests that show agitation;
- frequent changes to responsible gaming tools, such as repeatedly setting or changing deposit or loss limits, or repeatedly using cooling-off;
- a player maxing out a credit card; and
- attempts to open multiple accounts to get around deposit or loss limits.

9.4 Procedures

Operators must have a structured, documented process for responding to indicators of problem gambling. It must include:

- **Player profiles and risk assessment.** Player profiles with the data needed to assess individual risk, and a risk-based approach that sets the level of monitoring and intervention.

- **Recording.** Every responsible gaming interaction, whether started by the player or the Operator, recorded in PAM with the indicators of concern and any action taken. Responsible Gaming Complaints are recorded in PAM alongside these records (Player Complaints Policy, section 8.2).
- **Information.** Telling players who show at-risk behaviour about the tools available, such as deposit limits, cooling-off and self-exclusion.
- **Escalation.** A clear escalation protocol where appropriate, which may include a mandatory deposit limit, temporary suspension of the account pending assessment, and permanent exclusion in cases of severe or persistent risk.

9.5 No misuse of protective measures

Operators must never use responsible gaming measures as a pretext to prevent or delay a legitimate withdrawal. Misusing a protective intervention for financial gain is a breach of License conditions. Any hold on withdrawals must be objectively justified, documented and limited to the period reasonably necessary (Regulations 19.8 and 19.13).

10. Cooling-off and self-exclusion

10.1 Requirement

Operators must provide effective processes and tools that help players manage their own gambling. Two mechanisms must be available at all times through the RG Section:

- **Cooling-off:** a short-term, temporary restriction on gambling that the player can customise.
- **Self-exclusion:** a long-term restriction on all gambling under the Operator's License, which the player cannot cancel during the term.

Operators must not guide or influence players toward one option over the other, and must give no interference, bonuses or reassurances. Players must be clearly told how the two options differ and be offered the chance to go straight to self-exclusion if they identify themselves as vulnerable.

10.2 Comparison

	Cooling-off	Self-exclusion
Wagering	Prohibited, as selected by the player (all or by vertical)	Prohibited on all verticals
Deposits	Not permitted	Not permitted
Withdrawals	Permitted	Cleared funds must not be withheld, except where a lawful hold applies
Log-in	Permitted	Not permitted
Brands	Current brand, or all of the Operator's brands, as selected	All Platforms, brands and products controlled by the Operator under its License
Duration	At least 24 hours	At least 1 year
Changes	Can be made more restrictive	None
Ante-post bets	Remain active	Voided and refunded

	Cooling-off	Self-exclusion
Poker tournaments in progress	Must be completed	Must be completed
Marketing	Opt-out offered as an option	None; all messages blocked
Activation	By the player on the website; very limited operator involvement	By the player on the website; very limited operator involvement
Reactivation	Automatic	Initiated by the player

10.3 Activation rules for both tools

- The player activates the tool on the website or app. The Operator's involvement must be very limited.
- In exceptional cases the player may ask by email or chat. A self-exclusion request made in this way must take effect immediately on receipt. The selected cooling-off options must be enabled as soon as possible and in any event within 24 hours of the request.
- Subject to the previous paragraph, 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 continued play, or delay or complicate activation.
- The Operator may use one online confirmation step, neutrally worded, for example "You wish to cool off for one month. Please confirm." (Annex B).
- Operators must have a plan to fully automate any manual activation route in the short term.

10.4 Cooling-off

Requirement	Detail
Options	The player selects, by tick-box, a duration and a marketing opt-out. Selection of brand and vertical is at the Operator's discretion. Tick-boxes must not be pre-selected.
Durations	24 hours, 7 days, 1 month and 3 months.
Brand options	The current brand (website and/or app, including mirror domains), or all of the Operator's brands.
Vertical options	All gambling, or individual verticals offered by the Operator (for example casino, fixed-odds betting, poker and other peer-to-peer games). Casino may be split into all games or slots only.
If only duration is offered	All wagering on the brand where the restriction was started is restricted for the chosen period.
Timing	Restrictions take effect immediately.
Confirmation	For 1-month and 3-month periods, one neutral online confirmation may be used.
Account	The account stays active with gambling features disabled. Funds remain available to withdraw.

Requirement	Detail
Marketing	No marketing to players who opted out. No bonuses, free play or incentives during the period.
Reactivation	The account reactivates automatically when the period ends. The player need take no action.

10.5 Self-exclusion

Requirement	Detail
Durations	1 year, 3 years, 5 years, 10 years and lifetime. The Commission's minimum is one year.
Scope	All Platforms, brands, domains and gambling products controlled by the Operator under its License. Marketing is blocked automatically. The player selects only the duration, by tick-box.
Online completion	The player must be able to start and complete self-exclusion fully online, without email contact or Operator approval.
Timing	The request is recorded and restrictions take effect immediately on every channel. A wager accepted in error after the request must be voided and funds returned to the player, taking civil law into account.
Confirmation	One simple, neutral online confirmation may be used to check the player understands the consequences, for example "You have chosen to self-exclude for 5 years. Please confirm."
Account	The account is closed and the player can no longer log in. Cleared funds must not be withheld: the Operator must remit any cleared balance to the player, or give the player a way to withdraw it, subject to lawful verification, AML/CFT/CPF requirements and any lawful hold (Regulation 19.7).
Duplicate accounts	Operators must have robust measures to identify duplicate accounts where reasonably possible, and to stop self-excluded persons from opening new accounts under different details.
Ante-post bets	Voided and refunded, subject to AML/CFT/CPF rules.
Tournaments	A tournament already in progress must be completed.
Progressive jackpots	Contributions already made stay in place, but the player cannot take part in the jackpot after the exclusion takes effect.
Marketing	No direct marketing or advertising may be sent.
Payment methods	Where possible and in line with other regulation, payment methods known to the Operator that the player used must be blocked during the exclusion.

Requirement	Detail
Ending the exclusion	After the period ends, the player must ask in writing (email or chat) for the account to be unblocked. The request may be prompted when the player tries to log in or be made unprompted through official support channels. The Operator must not restart contact to bring the player back. The request must be documented, and any additional safeguards the Commission prescribes must be applied (Regulation 18.1(c)). Self-exclusion cannot be reversed or revoked during the chosen period, and a complaint or request to end it early must be declined (Player Complaints Policy, section 8.3).
Records	Operators must keep records of self-excluded players for at least 5 years after the exclusion ends.

11. Operator-initiated exclusion

An Operator may exclude a player as a high-risk intervention if:

- the player shows problematic gambling behaviour; or
- the player attempts or engages in criminal activity through the Operator's platform.

An Operator must not exclude a player solely because of the amount of their winnings.

Every operator-initiated exclusion must be formally documented, and records must be kept for at least five years. The Commission may ask for these records at any time.

Where an exclusion relates to suspected money laundering or other financial crime, the Operator must not disclose that reason to the player and must follow the AML Code (Part V.2, no tipping off). Any cleared balance must still be handled under Regulation 19 and the AML Code. A player may complain about an operator-initiated exclusion under the Player Complaints Policy (section 8.3).

12. Deposit limits

12.1 Requirement

Operators must give players a tool to set deposit limits, for a daily, weekly or monthly period, so that players can tailor limits to their own habits.

- Once a limit is reached, the player cannot deposit more until the period resets.
- Where players can change a limit that is already in place, a request to make it stricter must take effect immediately. A request to make it less strict, or to remove it, must not take effect until at least 24 hours after it is made (Regulation 18.1(d)).
- Wagers placed before a limit was set, whether resolved or not, are not affected.

12.2 Active play

A limit, cooling-off or exclusion can affect a wager or tournament already in progress, for example a player in a poker tournament or with an unresolved ante-post bet on a future event. In those situations, the restriction must take effect immediately, except for the active gameplay or wager, which continues until it is completed (subject to the specific rules for self-exclusion in section 10.5). Until it ends, the player must not place any further wagers or enter another tournament.

13. Staff training

Operators must train customer service and responsible gaming staff, and relevant agents, to handle player interactions professionally and effectively. Training must be given on appointment, with refresher training at least annually, and records of completion must be kept (Regulation 18.1(g)). Training must cover at least:

- recognizing signs of gambling distress, such as agitation, aggression or financial desperation;
- holding sensitive, structured conversations with at-risk players; and
- directing players to appropriate support resources and responsible gaming tools.

As a minimum, staff in Customer Support, VIP management and Marketing, and staff who handle complaints (in particular Responsible Gaming Complaints), must be trained.

14. Advertising and marketing

14.1 Standard

Operators must not engage in irresponsible advertising. Marketing, including visual content, must not:

- directly target Vulnerable Persons;
- target a self-excluded player;
- be misleading or abusive;
- represent gambling as risk-free;
- be directed into the Domestic Territory or a prohibited or restricted jurisdiction (Regulations 4 and 34.3);
- promote gambling as a way to achieve financial success or solve financial difficulties;
- suggest that skill can influence the outcome of games that are purely chance;
- portray gambling as a substitute for financial, emotional or mental well-being;
- be directed at Minors, or feature Minors or show them engaging with gambling content;
- contain overt sexual or pornographic imagery or suggestion; or
- link gambling with smoking, drug use, alcohol, seduction or enhanced attractiveness.

14.2 Bonuses and promotions

- Bonuses and promotions must be communicated transparently, with clear terms and conditions. Material terms, eligibility conditions and limitations must be presented clearly and must not be misleading by omission, prominence or presentation (Regulation 34.4).
- Operators must not use bonuses to encourage excessive gambling.

14.3 Third parties

- The Operator is responsible for the material it gives to affiliates, representatives, sponsors, ambassadors and social media influencers, including wording and visuals, where their actions or statements are paid placement or advertising.
- The Operator must make each contracted third party aware of its responsible gaming policy and require them to follow it.

14.4 Responsible gaming message

All advertising must carry a clearly visible responsible gaming message or slogan (Regulation 34.5).

15. Enhanced responsible gambling measures

15.1 When enhanced measures are expected

Operators whose business carries a higher level of risk may decide, or be expected by the Commission, to apply enhanced responsible gambling measures. Higher risk may arise because the business model is inherently high risk (section 3.4), or because a disproportionately high number of the Operator's players are assessed as at risk, either through the Operator's own checks or through the number of players choosing to self-exclude or cool off.

15.2 Internet filtering tools

- To help prevent underage gambling, Operators are advised to remind adults to take care when sharing devices with Minors, including keeping usernames, passwords and payment details secure.
- Operators may also link to third-party software that helps block access to gambling websites (Annex C).

15.3 Direct player interaction

- Operators may use automatic or manual pop-up notifications in response to concerning behaviour. Each must include a link for the player to contact a trained responsible gaming professional.
- When a player's behaviour reasonably suggests they may be a Vulnerable Person, the Operator must contact them directly, advise them to review the responsible gaming area and consider the tools and support services available.

15.4 Other limits

Depending on the Operator's target players and market, other limits may be considered, including loss limits, time limits and wager limits. Any limit an Operator offers is subject to the same rules on reductions, increases and removals as deposit limits (section 12.1).

15.5 Reality checks

Reality checks are optional. If an Operator uses them, they must be fit for purpose and can be designed without harming the player experience. They may include:

- a real-time session timer that stays visible while the player is logged in;
- a real-time clock in the player's time zone;
- periodic pop-up reminders about session length; and
- reality checks the player sets for themselves at chosen time intervals.

Player-set reality checks must pause play and require the player to confirm they have read the message before play resumes, with the option to end the session or continue. Messages may state how long the player has been playing and show winnings and losses for the period.

16. Records, reporting and supervision

16.1 Records

Record	Minimum retention
Responsible gaming interactions, indicators and actions (in PAM)	5 years
Age verification checks and outcomes	KYC/AML retention period; available to the Commission on request
Self-exclusion records	At least 5 years after the exclusion ends
Operator-initiated exclusion decisions	At least 5 years
Annual effectiveness reports and management responses	7 years
Complaint records, including Responsible Gaming Complaints	As set out in the Player Complaints Policy (at least 5 years)
Staff training records	At least 5 years after the training is delivered

16.2 Supervision

- The Commission may ask for any record required by this policy at any time, and Operators must provide it within 15 calendar days of the request.
- The Commission may review, inspect or audit an Operator's responsible gaming policy, controls and records, and Operators must cooperate, including with any Regulatory Support Provider appointed under the Gaming Regulations (Regulation 23).
- Operators must report any material change to their responsible gaming policy (section 4.4).
- The Commission may prescribe periodic returns on responsible gaming under Regulation 25.1 of the Gaming Regulations.

17. Compliance and review

17.1 Compliance

Adherence to this policy is a requirement of the License. Where an Operator fails to comply, the Commission will act in line with its monitoring and enforcement procedures, which may include directions to remedy, additional License conditions, financial penalties, suspension or revocation. Under the Gaming Regulations, failing to comply with a corrective direction, or a serious or repeated breach of player-protection requirements, may constitute serious non-compliance or grounds for suspension or revocation (Regulations 37 to 41).

17.2 Review of this policy

The Commission will review this policy at least every two years and after any significant regulatory change. It will publish changes together with the date on which they take effect.

Annex A. Checklist for an operator's responsible gaming policy

An Operator's responsible gaming policy submitted to the Commission should address each item below.

The Operator's policy should…	Section	Confirmed
Name the person responsible and describe the annual report to management	4	[ ]
Describe age verification at registration, at thresholds and before first withdrawal	6	[ ]
Describe the RG Section, homepage link, Terms and Conditions and footer content	7	[ ]
Describe account history and the self-assessment tool used	8	[ ]
Describe behaviour monitoring, indicators, risk levels, escalation and recording in PAM	9	[ ]
Describe how cooling-off and self-exclusion work, including duplicate account controls	10	[ ]
Describe the process and approval for operator-initiated exclusion	11	[ ]
Describe deposit limits and the handling of active play	12	[ ]
Describe staff training content, audience and frequency (on appointment and at least annually)	13	[ ]
Describe advertising controls, third-party oversight and the RG message	14	[ ]
Describe enhanced measures for higher-risk elements of the business	3.4, 15	[ ]
Confirm that no credit is offered	3.3	[ ]
Describe how Responsible Gaming Complaints are received, recorded and handled under the Player Complaints Policy	3.1, 7.1, 9.4	[ ]
Describe record keeping and review of the policy	16	[ ]

CAGE self-assessment questionnaire (Annex A, Part 2)

Players are encouraged to answer honestly:

1. **Cut down:** Have you ever felt you should cut down on your gambling?
2. **Annoyed:** Have people annoyed you by criticizing your gambling?
3. **Guilty:** Have you ever felt guilty about your gambling?
4. **Eye-opener:** Have you ever gambled or felt the need to gamble first thing in the morning to steady your nerves or recover from losses?

Interpreting the result: no “yes” answers indicates low risk. One indicates moderate risk, and further assessment may be needed. Two or more indicates high risk, and further evaluation and intervention are strongly recommended.

Annex B. Illustrative player-facing wording (guidance)

This wording is guidance only. Operators may use their own wording, provided it is neutral, clear and meets the requirements of this policy.

Use	Illustrative wording
Advertising message	Gambling can be addictive. Play responsibly. 18+ only.
Cooling-off confirmation	You wish to cool off for one month. Please confirm.
Self-exclusion confirmation	You have chosen to self-exclude for 5 years. Please confirm.
Explaining the two tools	Cooling-off is a temporary break of 24 hours to 3 months. You can still log in and withdraw. Self-exclusion is a long-term exclusion of at least one year. Your account is closed and cannot be reopened during the term. Any cleared balance will be returned to you. If you feel you have lost control of your gambling, you can go straight to self-exclusion.
Contact with a player showing at-risk behaviour	We noticed changes in your recent activity and would like to check in. You can set limits, take a break or self-exclude at any time in our Responsible Gaming Section. To speak to our responsible gaming team, reply or use live chat.
Closing a Minor's account	We have closed this account because our records show that you are under 18. Gambling is not permitted for anyone under 18.
Reopening after self-exclusion	Your self-exclusion period has ended. If you wish to request reopening, please confirm this in writing.

Annex C. Examples of support resources (guidance)

Operators should verify each resource, and add local support services for every target market, before publication.

Organization	Website	Type
GamCare	gamcare.org.uk	Support and information
Gamblers Anonymous	gamblersanonymous.org	Peer support; 20-question self-assessment
GambleAware	begambleaware.org	Support and information
BetBlocker	betblocker.org	Website blocking software
Gamban	gamban.com	Gambling site blocking software
GamBlock	gamblock.com	Gambling site blocking software