



network gaming

Responsible Gambling Policy

Version 1.2

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1 Definition

Responsible Gambling is the set of social responsibility initiatives employed by the gambling industry to ensure the integrity and fairness of gambling operators as well as to promote awareness of potential harms to players of participating in gambling activity.

Network Gaming takes this subject very seriously and ensures that we employ best practices to minimise the risk of harm to our players as well as our employees. Our policies and procedures are regularly reviewed to ensure we are doing the best job we can in pursuit of this aim.

2 New accounts and prevention of underage gambling

All new customers are required to apply for an account through our application form at www.networkgaming.co.uk. Part of the application process is to accept our terms and conditions. This acceptance includes they are comfortable for us to perform certain checks, some with 3rd party services to verify their identity and associated details.

On adding the address and before deposit, the client is immediately verified through GBG's ID3 Global to verify age and identity through a 2x2 matching check which also screens the

PEP and Sanctions list worldwide for name matches. This checks for a hard date of birth match. If the client fails the GBG check, they cannot access the system. We will then request an ID (passport or driving licence) and a copy of a utility bill dated in the last three months which matches their address. If they are matched on either a PEP or Sanctions list, we can run them through a Detailed Investigation with GBG to ascertain whether the match is the client or not. If we are uncomfortable with the results of our checks, Network Gaming will reject the application.

3 Responsible Gambling and Anti Money Laundering

Network Gaming operates strict AML procedures, which are detailed in the Network Gaming AML Policy and Procedures. This is closely tied in with the responsible gambling policy and those reaching CDD levels (£2,000 deposits) and EDD levels (£10,000, £30,000, £50,000, £100,000 deposits) are also interacted with regarding responsible gambling as we believe that the two policies should work hand in hand. Network Gaming make the interaction. We report monthly on the status of customers and those close to the thresholds.

4 Customer Interaction

If Network Gaming identifies a customer who we suspect may be experiencing, or at risk of developing, problems with their gambling, we initially attempt to interact with them to raise the concern and offer advice.

4.1 Identify

Network Gaming is aware of:

- The indicators of harm relevant to online gambling;
- How to spot when those indicators should trigger an interaction.

We put together what we know about the customer, with the indicators of harm, to decide whether we need to interact with the customer or not.

In order to identify at-risk customers, Network Gaming:

- Use a range of indicators relevant to our business. We don't rely on financial indicators alone but instead we use realistic trigger points for when usual behaviour becomes unusual and are aware that not every customer will trigger every indicator;
- Monitor customer activity in order that we can interact early and quickly. Invests in systems and staff to manage our process effectively;
- Ensure our processes and procedures keep pace with any increase in the scale of our operations;
- Train its staff to understand their roles and responsibilities as well as to recognise the signs of potential problems with a player's gambling activity;
- Ensure our customers are not at increased risk because they gamble overnight or out of regular business hours; and
- Takes social responsibility seriously for all customers and doesn't let commercial considerations override customer protection.

4.2 Using the appropriate indicators for our business

Changes in behaviour and gambling activity compared with previous known gambling activity is a general trigger that we use for customer interaction. When we do not have an adequate historical view, such a new customer, we assume lower levels of player spend as the benchmark that, if breached, will trigger interaction.

In order to determine if a customer is at-risk, we analyse the customer's activity to monitor for specific indicators such as:

- Account indicators - cancelled withdrawals, failed deposits, multiple payment methods;
- Use of responsible gambling tools - changing deposit limits, trying to stop reversing withdrawals, previous self-exclusions or previous customer interactions;
- Customer contact: information or hints from customers, frequent complaints, requests for bonuses following losses, or signs of distress;
- A 'big win' that could hide or even lead to harmful behaviour;
- Customers who bet at odd hours – activity outside of a customer's regular expected activity period; and / or
- Number of sessions/ 12 hour period (for instance, customers who have more than 5 sessions in a 12 hour period).

4.3 Spotting harmful behaviour

Network Gaming, when it increases its number of games to above 10, will produce a monthly report considering the following measures:

- Number of game tickets purchased;
- Number of game tickets purchased vs. previous period;
- The total staked; and
- The total won.

Since, currently, we only offer 10 games a year there are only limited window of opportunity for our players to gamble with us. However, we ensure it is still possible to spot patterns of harmful behaviour in the number of game tickets purchased.

4.4 Interaction

If a player is identified as being potentially at risk Network Gaming will seek to interact with the player in order to establish:

- They are comfortable with their level of play;
- They are comfortable with their level of spend;
- They are aware of the responsible gaming tools available to them should they want to apply limits to their account;
- If they mention anything about their losses that we explain that they can set a deposit/ casino loss limit on their account and refer them to the Responsible Gaming page of the website where they will find information about self-exclusion, problem gambling and where they can seek help if needed;
- If they show signs of being in distress, mention that they have a problem with gambling, that they are spending money they cannot afford and / or shows any signs

that their gambling is becoming a compulsion then the account is blocked immediately; and

- If they mention that they would like to close their account or self-exclude, the account is blocked immediately.

A customer interaction has three parts:

- Observation – behaviour we have spotted or something the customer tells us or our partners;
- Action – contact to prompt the customer to think about their gambling, and an opportunity for us to offer information or support; and
- Outcome – what we or what the customer does next.

5 Ongoing reviews to our processes

We regularly review and scrutinise our customer interactions to establish their effectiveness in delivering the appropriate help and support to our customers. We evaluate our approach, use what is learnt to update our processes and to share details of our improved practices to our employees and also, where appropriate, with our business partners. The result of our evaluation is recorded in the customer's Custodian file using the "Customer interaction" note type. Each quarter a meeting is to review the effectiveness of our processes for monitoring of PEPs, KYC, Problem Gambling and Risk Assessment. The purpose is to review our monitoring and identify any areas for improvement. We also analyse any self-exclusions, cases of money laundering and problem gambling that have arisen in the previous quarter.

6 Employing people who are underage

It is the policy of Network Gaming to never employ anyone under the age of 18 and all employees have to submit a passport as proof of age before starting work.

7 Self-exclusion

Customers that wish to self-exclude can do so by emailing harry@networkgaming.io. Once received they can choose from three options:

1. Six month self-exclusion;
2. 1 year self-exclusion; or
3. Lifetime exclusion.

If selecting option 1 or 2 then customer will need to contact us once the exclusion period has elapsed to request account reactivation, this will be subject to a 24 hour review period. Customers may withdraw their request to re-open their account at any time during that 24-hour review period. If an account is approved to be reopened, members are provided with advice and information about our responsible gambling tools and we will enforce a deposit limit on the reopening of the account at a level the member has confirmed is affordable and sustainable.

8 Gamstop

Network Gaming supports and is integrated to the GAMSTOP self-exclusion service. We encourage and direct our members when they contact us to self-exclude to also consider using GAMSTOP in order to exclude themselves from all licensed Gambling sites in the UK.

The self-exclusion is available for a period of 6 months, 1 year or 5 years. Where we become aware a member has attempted to breach their GAMSTOP self-exclusion, we follow the reporting requirements as stipulated by the Gambling Commission.

9 Crime Prevention Staff

Network Gaming undertakes a stringent due diligence process when employing new members of staff, regardless of their level with the company. This will include Disclosure and Barring Service checks and possession of the appropriate licence issued by the UK Gambling Commission should the role require it.

10 Employee Training

The Head of Responsible Gambling is tasked with ensuring all relevant employees are aware of their obligations in respect of responsible gambling, and ensuring they receive regular training in Responsible Gambling. The training and support programmes are designed as a continual process that is aimed at raising the awareness levels of responsible gambling issues and providing real customer experiences plus any updates on industry related and regulatory initiatives and campaigns. Our internal training programme is also further supported by GamCare, who provide classroom industry related training and learning material for all our front-line facing staff and a marketing related training session for all our marketing employees on an annual basis.

11 Responsible Advertising Policy

Network Gaming operates a strictly enforced 18+ policy on account opening.

We do not advertise on television and if we use social media we target our advertising at a strictly 25+ audience using Facebook direct algorithms to ensure that the audience viewing our adverts are those engaged and of the correct demographic.

Network Gaming do not offer permanent sign-up offers but may on occasion offer one. It is not our policy in general to use Free Bets to entice new users, and instead we value long term relationships which are managed through responsible account management and frequent interactions. If our customers are happy, we are happy.

For any offers we do promote, clear terms and conditions will be attached.

Significant conditions are always prominently displayed with an advertised offer. If the significant conditions are not displayed with sufficient prominence, the ad will be seen as misleading.

Other terms and conditions of the offer are, at most, 'one click' away from the advertising. If the significant conditions are not displayed with sufficient prominence, the ad will be seen as misleading.

11.1 Best practices we adopt:

- Insert Ts and Cs hyperlink on the banner;
- Banner to redirect to the promotion page;
- Ts and Cs hyperlink to redirect to the promotion page; and

- Significant conditions to be displayed on the banner (significant conditions are key restrictions which apply to a Promotion, for instance who is excluded; time limitations; how to qualify; maximum stake size; Wagering Requirements (WR), etc).

Furthermore, we ensure all Significant Conditions are provided:

- In a clear, timely, intelligible, unambiguous, transparent, non-misleading and prominent manner;
- In the ad & headline offer on all relevant landing webpages and sign-up webpages (or equivalent) for that Promotion; and
- In the ad & headline offer on other advertising - except if impossible due to significant limitations on time and/or space ...in which case we give as much info about Significant Conditions as possible in the ad and headline offer plus a link to a webpage (or equivalent) with all Significant Conditions & other terms.

12 Third Party Organisations

Network Gaming clearly presents the website links and contact details for a number of self-help organisations on its websites where members can find further information, help and support for gambling related problems including:

- **Gamble Aware** provides information on how to gamble responsibly and offers advice on dealing with problem gambling, please visit www.gambleaware.co.uk
- **GamCare** is a registered charity that provides confidential telephone support and counselling to anyone who is affected by problem gambling. You can contact GamCare on 0808 8020 133 (local rate from UK) or by visiting www.gamcare.org.uk
- **Gamblers Anonymous (UK)** is a fellowship of men and women who have joined together to share their experiences, try and solve their common problems and thereby help others to recover from gambling problems. Gamblers Anonymous can be contacted on 020 7384 3040 (UK only) or by visiting www.gamblersanonymous.org.uk
- **Gamblers Anonymous International Service Office** - If you live outside the UK this organisation provides details of your nearest local participating Gamblers Anonymous support group. Please visit <http://www.gamblersanonymous.org> for further details.
- **Samaritans** is a registered charity aimed at providing emotional support to anyone in emotional distress, struggling to cope, or at risk of suicide throughout the UK and Ireland. <https://www.samaritans.org/>.