

Responsible Gaming Policy Document

Introduction:

The majority of Bahamians who engage in domestic gaming as a form of entertainment and a leisure activity of choice, do so responsibly. They are fully aware of and are savvy consumers based on their knowledge of the games and the transparency of the information provided by individual operator members – in addition to the standardized educational materials provided by The Bahamas Gaming Operators Association (BGOA). There is a recognition; however, that some consumers are "at risk" gamers, who may under certain circumstances, develop gambling related issues. Such individual behavior can range from moderate to compulsive to pathological. In the latter cases, particularly, the BGOA has in place escalation protocols for professional intervention by trained and internationally certified addiction specialist from Sandilands Rehabilitation Centre, The LEAD Institute, Renaissance Institute headed by Dr. David F. Allen and other Professional Clinicians trained in the area of addiction, with a special emphasis on gambling related issues.

Each operator member has in place as part of their regulatory mandate, a responsible gaming program, which is standardized to the BGOA's. The online platform used by the domestic gaming operators – would allow for the proper monitoring and tracking of players gaming behavior and patterns. Such use of technology, would afford operator members and their respective teams to ensure such valuable data is used to ensure consumer protection of gamers becoming "at risk" players.

Principle 1: PROMOTE RESPONSIBLE GAMING

- Providing customers with detailed educational responsible gaming guide about the possible risks and harms of online gaming, signs to look for relative to "at risk" behavior and tips of gaming more responsibly.
- Providing on-going extensive training for staff of operator members to ensure players game responsibly.
- Providing a 24/7 whatsapp, e-mail and telephone contact via the BGOA, for qualified sources of help.
- Offering customers the opportunity and ability to create self-imposed limits or to self-exclude.
- Not providing credit to customers.



Principle 2: KNOW-YOUR-CUSTOMER AND PREVENT UNDERAGE GAMING

- Prominently displaying a 'no under 18's' sign in every operator member location and on the homepage of the members' websites, linking to a clear message about why underage play is strictly prohibited.
- Advising parents/guardians regarding recognized filtering programmes, including a link to a
 recognized filtering programme to enable customers/parents to prevent minors from
 accessing gaming and betting sites
- Strictly enforcing the underage policy by ensuring security guards/and other staff check for appropriate identification to prevent access of such persons on gaming premises or to establish accounts.
- Regularly monitoring potential abuses of underage gaming and betting by conducting random checks of customers to ensure compliance with age restrictions.
- BGOA conducting quarterly town hall meetings and other educations forums to ensure its responsible gaming policy is widely known and to educate the market.

Principle 3: ZERO TOLERANCE OF FRAUDULENT AND CRIMINAL BEHAVIOUR

- Strictly enforcing through operator members risk compliance units, anti-money laundering (AML) and counter-finance terrorism (CFT) policies and procedures to cater for the identification, escalation and reporting to The Gaming Board For The Bahamas, unusual or suspicious activities, including investigating material or unusual deposits, withdrawals and customer accounts where little or no gaming or betting activity takes place.
- Strictly enforcing Know-Your-Customer (KYC), policies for opening and operating customer accounts for the sole purpose of gaming and wagering, in accordance with regulatory requirements.
- Logging of all information regarding changes to customer details and requesting appropriate verification documentation for significant changes (e.g. changes to customers' names and banking details)

Principle 4: PROTECT CUSTOMER PRIVACY AND SAFEGUARD INFORMATION

- Protecting confidential customer information from unauthorized or unnecessary disclosure by ensuring world-class data protection measures are in place by each operator member.
- Ensuring privacy and confidentiality: customers will be informed on BGOA's & Member websites about the exact terms and conditions of the member's privacy policy.
- Strictly ensuring that only customers who hold valid accounts are allowed to game and preventing third parties from using customer accounts for gaming.



Principle 5: PROMPT AND ACCURATE CUSTOMER PAYMENTS

- Ensuring prompt and accurate processing of payments subject to appropriate and necessary checks and verifications of all winnings
- Allowing customers to open only one account, by providing the following minimum information: name, age, address, unique username and password.

Principle 6: RIGOROUS INDEPENDENT ASSESSMENT OF PRODUCT FAIRNESS AND RANDOMNESS

- Implementing a product testing policy, approved and supported by the BGOA member's senior management, which will provide for the internal and external testing of all products for fairness and randomness.
- Ensuring internal audits are conducted by BGOA members to ensure all gaming platforms continue to meet GLI certified international best practice standards.

Principle 7: ETHICAL AND RESPONSIBLE MARKETING

- Ensuring that advertisements shall not entice the underage to game or wager and shall not be displayed in any form of media that is clearly targeted at the underage.
- Ensuring that advertisements only contain factually correct information and avoid misleading information.
- Ensuring that members do not knowingly engage in the distribution of unsolicited advertisements (i.e. SPAM) either directly or through a third party.

Principle 8: COMMITMENT TO CUSTOMER SATISFACTION AND SUPPORT

- Giving customers the opportunity to log complaints and disputes on a 24/7 basis, with clear escalation protocols on how complaints will be addressed and redressed.
- Ensuring that an independent third party shall be available for mediation or resolution of disputes received from members or their customers in accordance with the regulatory requirements of the Gaming Board for dispute resolution.



Principle 9: RESPONSIBLE PRACTICES UNDERPINNED BY A SECURE, SAFE AND RELIABLE ENVIRONMENT

- Having a legal operating license from issued by the Bahamas Government in accordance with the Gaming Act & Regulation of 2014.
- Having annual audits of accounts and financial statements conducted by reputable and qualified external accounting firms of BGOA members' to ensure compliance with best business and accounting practices.
- Having an independent third party assessing on an annual basis the BGOA members' compliance with international best practices and standards

Conclusion:

BGOA members take facts based measures on responsible gaming, which are customized to the customer behavior in order to ensure the protections of minors, vulnerable groups and problem gamblers. The BGOA responsible gaming policy are aligned to existing regulations of The Gaming Board for The Bahamas. The BGOA believes that consumer protection through awareness, education and advocacy is paramount to ensure that gaming as a form of entertainment and leisure is enjoyed in moderation and the risks associated with it is mitigated. The BGOA encourages its members to ensure it meets all aspects of our standardized responsible gaming policy and program and the process is transparent to all to ensure a high level of accountability and consumer protection in a highly regulated environment.