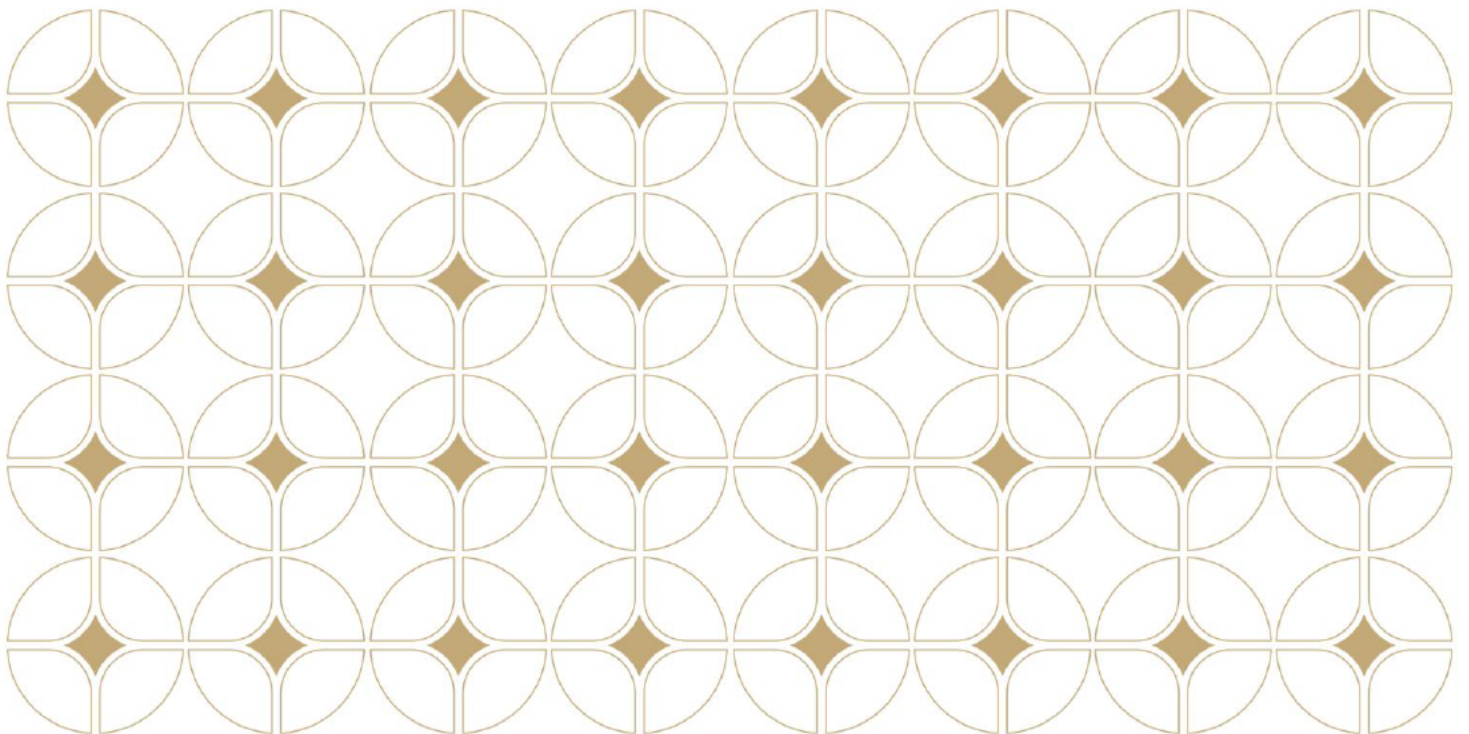


Responsible Gaming Framework

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Purpose, Goals, and Principles

Purpose

The General Commercial Gaming Regulatory Authority (GCGRA) is committed to ensuring that the entertainment activities it regulates focus on responsible play. This requires all stakeholders to work in a coordinated manner to address gaming-related risks, reduce harm, and improve player health. This Responsible Gaming Framework (the “Framework”) highlights the GCGRA’s objectives and strategies to encourage responsible play. The Framework will assist licensees to conduct operations responsibly. Moreover, it will ensure stakeholders are aligned on core objectives and collaborate in a shared commitment to providing players with a safe and enjoyable experience while minimising potential harm.

The Framework provides critical principles, guidelines, and recommended practices as a basis for developing licensees’ responsible gaming programs. The Framework further serves as a work plan for the GCGRA, mental health service providers, community organisations, and GCGRA licensees. It is structured to ensure that GCGRA licensees approach responsible gaming reasonably, consistently, and transparently to facilitate the overarching commitments to responsible play and harm minimisation.

Goals

The Framework is intended to support a gaming environment that is safe, enjoyable, and sustainable. This is achieved by balancing the interests of creating a valuable addition to the entertainment options in the UAE with the needs of players and the community. The responsibility for ensuring gaming is fun and safe does not reside with any one party. Instead, it is a shared responsibility amongst stakeholders involved in the gaming ecosystem and the communities it serves. To be successful, we must commit to deliver measurable results for the following goals:

1. Informed Decision Making

Our operators, technology providers, and other relevant stakeholders support player decisions based on a clear understanding of the risks of playing, odds of winning and losing, and consequences associated with their actions.

2. Positive Play

Individuals who choose to play will demonstrate responsible behaviours and beliefs, including pre-commitment, honesty and control, personal responsibility, and game literacy.

3. Protecting Vulnerable Populations

We prohibit underage access to gaming and avoid marketing to other vulnerable populations. We promote self-exclusion support for at-risk individuals and use advanced technology to monitor and address harmful behaviour.

4. Support for Players and Families

We provide access to resources that serve the needs of players and other affected individuals.

UAE Responsible Gaming Alliance

To help implement the Framework, the GCGRA intends to establish the UAE Responsible Gaming Alliance (the “Alliance”). The Alliance will serve as a platform to align stakeholders and coordinate resources. It will act as a strategic advisory council, forging a cohesive network of resources dedicated to public education, specialised training for counsellors, and support for mental health resources. This collaborative approach will support positive play by elevating awareness of tools and resources accessible to players and offering crucial support for those encountering difficulties with commercial gaming activities.



Key Principles

The Framework reflects a set of principles designed to enable players to make rational decisions about their gaming experience. We seek to enable every player to enjoy a safe experience free from harm. We will create monitoring tools to heighten awareness of problem behaviour and deploy strategies to educate and empower players and reduce harm. The following principles represent the building blocks of the GCGRA's collaborative strategy to promote responsible play and safeguard vulnerable players. By collaborating on these common core principles, stakeholders will ensure a sustainable, socially responsible, and accountable approach to commercial gaming. The Framework encourages innovation and will evolve under the leadership of the Office of Socially Responsible Gaming (OSRG) with a consistent focus on fostering positive impacts on communities, promoting healthy behaviour, and minimising harm.

1. Stakeholder Collaboration

We will enable collaboration between regulators, local governments, community organisations, researchers, clinicians, operators, technology vendors, and other industry stakeholders to create a cohesive and comprehensive approach to responsible gaming. The UAE Responsible Gaming Alliance will be at the centre of fulfilling the Framework's mission.

2. Informed Choice

We will ensure players have essential information about the games, the odds of winning, and the potential risks involved with participation. We will empower players to make decisions based on complete, accurate, and clear information.

3. Integrity, Transparency, and Fair Play

We will operate every game on a principle of fair play, ensuring that players are treated equitably and that games are rigorously evaluated for fairness. We will also ensure that the rules and functionality of the games are ethical, accessible, and understandable.

4. Time and Money Management

We will ensure players have tools to set limits on the amount of time and money they can spend. We will rely on fact-based research findings to develop the most effective strategies for encouraging responsible play.

5. Access Control

We will deploy the most effective strategies and technologies to restrict minors and vulnerable individuals from accessing gaming platforms. Our operators will deploy rigorous age verification processes and offer options for self-exclusion. The GCGRA will administer a broad self-exclusion program, allowing players to tailor the restrictions to their specific needs.

6. Support and Intervention

We will use a multi-faceted strategy to direct players with issues to counselling services, self-help resources, and player management tools to promote recovery and reduce harm.

7. Training and Awareness

We will train staff to educate players, dispel myths about gaming, recognise the early warning signs of problems, and provide resources to assist players most at risk of gaming-related harm.

8. Research and Innovation

We will continuously invest in research to understand the changing patterns of gaming behaviour and the latest strategies to promote responsible gaming. We will lead efforts to create technological solutions that can help mitigate problems in gaming.

9. International Cooperation

We will work with global partners to foster the best research, technologies, and strategies to achieve common goals and use resources efficiently.



10. Continuous Improvement

We will regularly review and update policies, practices, and systems to ensure they align with the latest research and best practices. The GCGRA and stakeholders will maintain a dynamic approach that relies on evidence and analysis, mindful of changing risks, technologies, and player behaviours.

In summary, the GCGRA will adhere to an evidence- or fact-based approach to decision-making when administering the Framework. Where data exists, it should be used to help guide activities and programs in responsible gaming. Where evidence or data is lacking, the GCGRA commits to following a precautionary approach when there is reasonable concern that gaming-related harm could occur. The GCGRA and relevant stakeholders will apply the notion of continuous improvement. As more information becomes available, programs and services can be adapted to respond to opportunities and challenges around gaming in the UAE.



Comprehensive Planning

An effective, responsible gaming program is more than a collection of activities. It is a coordinated and comprehensive effort that ensures responsible gaming is integrated into all aspects of regulated gaming in the UAE.

As part of their licensing agreement, each gaming operator will submit a Responsible Gaming Program to the GCGRA, which must document consideration of the Framework and implementation of business-specific systems and processes in line with these guidelines. The GCGRA must approve this program before authorising the operator to conduct gaming activities. The operator must update the program annually.

Responsible Gaming Program Minimum Requirements

1. An overarching commitment to responsible gaming, including the Goals of the Responsible Gaming Framework;
2. A summary table describing how the contents of the program meet the Key Principles of the Framework in support of the broader Framework Goals;
3. A plan for educating players about gaming and positive play, informing them about support services available to individuals with problems and their families;
4. A plan for responsible marketing of gaming;
5. A plan for employee training related to responsible gaming and appropriate responses to circumstances in which individuals present signs of distress or disclose a problem;
6. A research and evaluation plan to assess the effectiveness of program components and ways to improve their performance over time and
7. Procedures to assess, prevent and address problematic play by individuals, including:
 - Identifying players with suspected or known harmful play;
 - Preventing sports wagering by Ineligible Persons; and
 - Identifying vulnerable populations.

Additional Operator Requirements

1. A commitment to participate in responsible gaming initiatives, including, but not limited to:
 - Participating in responsible gaming operator committees;
 - Providing additional education and awareness for vulnerable and non-player populations; and
 - Active involvement in the UAE Responsible Gaming Alliance;
2. Developing procedures for advertising and marketing that comply with applicable standards of socially responsible advertising, including all applicable GCGRA requirements for advertising, promotions, and marketing;
3. Annual reporting on responsible gaming activities; and
4. Other policies and procedures, as determined by the GCGRA, are to prevent problem gaming and encourage responsible gaming.

Responsible Advertising and Marketing

As part of the licensing agreement, operators in the UAE must develop and implement strategies to ensure that advertising and promotions are delivered responsibly. This includes advertising sensitive to possible youth exposure, considering vulnerable populations, and ensuring that marketing messaging is designed to promote positive play and the availability of problem gaming resources. The strategies should distinguish between mass, digital, and direct marketing to known players.

As part of its license application, each operator shall submit an advertising and marketing plan to the GCGRA, including strategies to limit unwanted advertising and marketing aimed at Underage Persons. These strategies



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shall not imply an expectation of financial reward or relief of financial difficulty, portray gaming as a source of employment or a way to achieve social status, or positively portray symptoms of problematic play.

At a minimum, operators will be responsible for ensuring all advertising and marketing materials comply with the following:

1. Disclose the identity of the gaming operator.
2. Contain a statement that Underage Persons are not allowed to open or have access to licensed gaming activities.
3. Do not include or depict:
 - Underage Persons, except live footage or images of professional athletes who may be Underage Persons in Sports Events on which Sports Wagering is permitted;
 - Students;
 - Schools or universities; or
 - School or university settings.
4. Do not state or imply endorsement or participation by:
 - Underage Persons;
 - Schools or universities; or
 - Schools or university athletic associations.
5. Do not target Underage Persons, Ineligible Persons, individuals with gaming problems, or other vulnerable individuals.

Operators must develop and implement strategies to ensure compliance with the GCGRA's evaluation and approval process for advertising before it is exposed to the public. To assist operators and their advertising vendors, the GCGRA has developed Advertising Guidelines establishing parameters to avoid targeting vulnerable groups or misleading the public. The Guidelines focus on player education and empowerment to promote responsible play.

Education and Awareness

A vital element of any responsible gaming program is ongoing education and awareness for players. Well-informed consumers are best able to make rational decisions about the risks of playing and how to protect themselves from potential harm. As part of its overarching commitment to responsible gaming in the UAE, the GCGRA will require its licensees to provide players with the information they need to make informed choices about their gaming behaviour.

The UAE Responsible Gaming Alliance will coordinate responsible gaming messaging required of gaming licensees to ensure players receive regular information on all public-facing channels, information concerning problematic warning signs, triggers, and responsible gaming tips. Age verification laws must be communicated. Players must be made aware of free counselling resources, urgent response counselling, and other forms of treatment referral available in the UAE. Finally, players must receive information about self-limitation tools, gaming activity reporting tools, and the GCGRA's Voluntary Self-Exclusion program.

We will reflect the Framework's focus on informed decision-making by investing in cognitive strategies to improve players' understanding of game functionality and odds and to discredit misconceptions that might lead individuals to develop harmful behaviour. The central premise of the cognitive approach centres on the understanding that how people think about the games and how they work significantly influences their behaviour as players.



Modifying these cognitive factors can promote responsible play and reduce harmful behaviours. Here are the main components and strategies involved in this approach:

1. Addressing Cognitive Distortions:

One of the key ideas is to recognise and address cognitive distortions or erroneous beliefs related to gameplay. Common distortions include:

- a. Illusion of control: Believing one has control over a game's outcome, which is genuinely random.
- b. Gambler's fallacy: Thinking past events can predict future outcomes (e.g., thinking a coin is "due" to land on heads after several tails).
- c. Overestimating chances of winning: Incorrectly perceiving the odds of winning to be higher than they are.

2. Promoting Cognitive Behavioural Therapy:

Cognitive Behavioral therapy is a therapeutic method that is used to treat gambling problems. It aims to identify and correct faulty cognitions and replace them with more accurate and healthier beliefs. This can reduce the urge to gamble and increase one's ability to resist temptations.

3. Awareness and Education:

Increasing awareness about game rules, strategy (including popular flawed strategies), the actual odds of winning, and the mechanisms behind games can dispel myths and reduce cognitive distortions. This includes advertising campaigns, warning labels on gaming machines, and educational programs.

4. Mindfulness and Self-awareness:

Teaching players to be present and self-aware can help them recognise their urges, thoughts, and feelings related to gameplay. By observing these without judgment, individuals can make more informed decisions about whether to play or if controls are needed to enjoy playing recreationally.

5. Pre-Commitment Strategies:

By understanding their own cognitive biases, players can set limits on the amount of time or money they will spend in advance, reducing the chances of excessive losses. Self-assessment tools, spending calculators and questionnaires can be considered.

6. Feedback Systems:

Games and player accounts may incorporate feedback mechanisms that provide players with periodic or real-time information about their money or time spent. By receiving this feedback, players can adjust their behaviour in line with their intentions and limits.

7. Time and Money Management Training:

Training in practical skills, like setting budgets or tracking time, can empower gamblers to play within their limits.

8. Relapse Prevention:

Recognising that setbacks can occur, cognitive strategies should include identifying high-risk situations and triggers, developing coping strategies, and establishing support mechanisms to prevent or manage relapses.

Our goal is to foster a balanced approach where individuals can enjoy the activity without falling into patterns of harm or addiction. The Alliance will continuously evaluate its strategy for content delivery to ensure the information is easily accessible and connected to the right audiences.



Responsible Gaming Tools

As part of the ongoing commitment to responsible gaming and harm minimisation, the GCGRA requires all operators to offer a minimum suite of tools that will allow gaming customers to set limits on their activity. Operators must consider these tools in designing, delivering, and evaluating gaming products.

Gaming operators must provide GCGRA-approved responsible gaming and problem gaming information that is readily accessible to each player and conspicuously displayed on each applicable Internet Website, Mobile Application, or land-based gaming venue.

The GCGRA's requirements include a series of tools that allow players to establish their own limits in areas such as:

Cooling Off Periods

Each operator shall enable a player to restrict themselves from a licensed operator's online gaming platform for a period of time the player specifies, which must not be less than seventy-two (72) hours, by submitting a request to the operator through its Internet Website or Mobile Application with the operator's customer support team. During the cooling-off period, operators must not engage in direct or indirect marketing activities targeted at players who have opted for this pause in gaming activities. During the cooling-off period, operators must not:

1. Engage in direct marketing communications, including any personalised communication intended to encourage or invite the player to gamble, such as emails, text messages, mail, or phone calls.
2. Offer any promotions, bonuses, free bets, or incentives, explicitly or implicitly, to the players in the cooling-off period. This includes suspending any ongoing promotions or loyalty benefits that the player was previously entitled to and ensuring no new offers are communicated or made available to them.
3. Use indirect marketing tactics such as general advertising, social media, or any public communications designed to reach players indirectly in the cooling-off period. Operators must employ measures to minimise exposure to these players, leveraging technology and data insights to exclude them from such marketing exposure.

Informed Player Requirements

The operator shall also provide information on the following:

1. Available resources addressing addiction and compulsive behaviour;
2. How to close an account and restrictions on opening a new account during the period of self-restriction;
3. Requirements to reinstate an account at the end of the self-restriction period;
4. The ability to enrol in the GCGRA's Voluntary Self-Exclusion (VSE) Program and a link to the VSE site and
5. How the operator will manage bonuses or promotions and account balances during and after the period of self-restriction, and when the player closes their player's account.

Player Management Tools

1. A deposit limit shall be offered on a daily, weekly, and monthly basis and shall specify the maximum amount of money a player may deposit into their player's account during a particular period of time. The deposit limit implementation process should include normative feedback to the customer to assist in setting the deposit limit (e.g., "The average deposit limit is AED 500 per month"). The aim is to provide information about positive play but not constrain individual choice.
2. Any decrease to these limits shall be effective immediately or at the point in time (e.g., next login, next day) that was clearly indicated to the player. Any increase to these limits shall become effective only after the time period of the previous limit (e.g., day, week, month, etc.) has expired and the player reaffirms the requested increase.



Voluntary Self-Exclusion

The GCGRA's Voluntary Self Exclusion (VSE) program is available in the UAE to assist players who recognise they have experienced challenges or a loss of control over their gaming behaviour and wish to use the VSE program as a tool to assist them in managing their problem behaviour. The GCGRA administers the program by dedicating specialised resources and imposing requirements on operators to assist in the program administration. Operators must train their employees, in conformance with GCGRA requirements, to inform players about the goals and requirements of the VSE program and how it may be accessed.

Voluntary participation in the VSE program ensures that players are:

1. Excluded from marketing lists, including social and online sites;
2. Prohibited from establishing a player account;
3. Declared ineligible to place a wager with a licensed gaming operator (similar to an underage person) and, as a result, ineligible to win if the participant violates the terms of self-exclusion and illegally places a wager and
4. Excluded from the premises of gaming facilities where licensed gaming is offered.

Each person seeking placement in the GCGRA Voluntary Self-Exclusion Program acknowledges that it is their responsibility to refrain from engaging in gaming activities under the jurisdiction of the GCGRA and must agree to:

1. Refrain from participating in gaming activities for the period specified in the exclusion registration agreement and
2. Not petition the GCGRA for removal from the program for the period specified in the exclusion registration agreement.

An individual may request to have their name placed on the Voluntary Self-Exclusion List by completing the exclusion registration agreement.

When a person signs up for VSE, this does not prevent an Operator from seeking payment of a debt accrued by the individual before the individual entered the program.

The confidential lists will be regularly provided to operators who shall establish procedures to add the identities from the Voluntary Self-Exclusion List into their internal list to exclude from licensed gaming activities.

The Operator shall establish procedures that are designed to make all commercially reasonable efforts to:

1. Prevent an individual on the Voluntary Self-Exclusion List from opening a new player's account.
2. Identify and suspend any player's accounts of an individual on the Voluntary Self-Exclusion List to prevent further participation in gaming in the UAE.
3. Promptly notify the GCGRA or its designee if an individual on the Voluntary Self-Exclusion List attempts to place or is discovered to have placed a wager.
4. Deny an individual identified on the Self-Exclusion List from any winnings derived from wagering while on the Voluntary Self-Exclusion List or Involuntary Exclusion List.
5. Refund any remaining balance to an individual on the Voluntary Self-Exclusion List, provided that the gaming operator acknowledges that the funds have cleared.
6. Ensure that individuals on the Voluntary Self-Exclusion List do not receive direct marketing, telemarketing promotions, player club materials, or other targeted promotional materials relating to gaming in the UAE.



Ongoing Improvement and Reporting

Consumer behaviour, technology, and economic conditions all drive changes in risk profiles that require adjustments to strategy, creation of new tools, and reallocating resources towards programs or processes that address relevant risks. Accordingly, program evaluation and Key Performance Indicators (KPIs) are essential to continuous improvement and validating strategic investments. KPIs provide quantifiable measures reflecting the performance and success of the Framework's objectives and strategic goals. KPIs enable effective governance, create stakeholder accountability, and provide public confidence in our mission.

In support of the Framework Goals, licensees are expected to develop a program evaluation and improvement strategy that assesses the relative performance of programmatic elements and operations. Licensees should identify which metrics are strategically important as part of this program. They should serve as business KPIs, what appropriate industry benchmarks are available for the measures, and how management, the GCCRA, and other stakeholders should use them to make timely decisions, evaluate risk, and allocate resources.

As part of its licensing agreements, all operators are responsible for continually improving their responsible gaming strategies and reporting annually on their accomplishments. To meet these objectives, operators will commit to:

1. Maintain appropriate records relating to their practices in the Responsible Gaming Framework;
2. Provide responsible gaming-related updates to the GCCRA and designated Mental Health institutions, as requested;
3. Submit an annual Responsible Gaming Plan progress report according to GCCRA standards;
4. Participate in and cooperate with the UAE Responsible Gaming Alliance; and
5. Participate in any GCCRA-led, sponsored, or officially recognised research relating to gaming activity.

Maintaining Player Behaviour Database

Operators must maintain a detailed Incident Register. This register should systematically document incidents involving patrons and the subsequent actions taken by staff. The information recorded should be comprehensive and include at least the following:

1. The date and time of the incident.
2. The specific location where the incident occurred.
3. A clear description of the nature of the event, especially if it pertains to a gaming-related issue or a complaint made by a patron.
4. The full name and address of the individual associated with the incident; if this information is not obtainable, a detailed description of the person should be provided.
5. The name of the staff member who managed the incident

Staff Training

Responsible gaming (RG) training is provided for employees and encompasses a comprehensive curriculum that ensures staff are well-versed in company RG policies, local codes of practice, self-exclusion procedures, and regulatory requirements. This begins with the identification and accessibility of RG policies during training, underpinning the organisation's commitment to RG through detailed explanations, examples, and operational policies, such as prohibited marketing activities. The program's content should be expert-informed, drawing on insights from responsible gaming specialists and adult education professionals to ensure it reflects best practices and current research in RG.



The training emphasises the understanding of all aspects of the RG program, including:

1. Problem gambling and its effects;
2. The risks involved with gaming;
3. Signs of problems; and
4. Strategies for safer gaming.

Employees should learn about game mechanics, the randomness involved in gaming, the house edge, and the odds of winning and losing. Practical application should be addressed as staff are educated on interacting with and assisting players potentially facing issues. This includes role-specific guidelines, identification and response techniques for suspected problem gambling, escalation processes, and cultural sensitivity. To prevent the reinforcement of gambling myths, staff are trained on how to address common misconceptions and taught ways to avoid perpetuating false beliefs. Training is mandated for all new hires and is refreshed periodically, with specialised training for key personnel, including those in customer-facing roles and those responsible for escalated events.

The training strategy is designed with clear objectives, catering to diverse learning styles, and has materials tested for understanding and comprehension. Follow-up reviews are instituted to reinforce the learning. An integral part of the training program is its evaluation process, which is both formative and summative. The primary purpose of formative assessment is to monitor learning progress during the instructional process. It is diagnostic and designed to provide ongoing feedback to instructors and learners to improve the teaching and learning process. Summative assessment aims to evaluate the effectiveness of a program, course, or instructional intervention at its conclusion. It measures the extent to which the learning objectives have been achieved.

