# CAZINO.NL

Duty of care research 2025



# Colophon

Title: Casino.nl Duty of Care Survey 2025

On behalf of Casino.nl

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Aim of the study: The study aims to identify how Dutch online gambling operators implement their duty of care and protect players from gambling addiction. By assessing compliance with laws and regulations and highlighting best practices, the study encourages further professionalization of responsible gambling.

Methodology: The study consisted of a content analysis of 25 legal online gaming operators in the Netherlands, testing their websites against 37 mandatory and 38 optional criteria. Two researchers collected data (both on mobile and desktop, as a non-logged-in guest and logged-in player) and we processed feedback from operators.

Audience: Policy makers, regulators, gambling industry professionals, academics and consumers with an interest in gambling regulation and policy.

Questions and comments: contact info@casino.nl

Disclaimer: Casino.nl maintains commercial partnerships with some of the operators mentioned in this report. This research was conducted independently and prepared without interference from these parties. The author has no personal commercial interests with the surveyed operators. For more information, please visit our website.

#### Translation note:

This report was originally written in Dutch and translated into English using DeepL. While we have reviewed the translation for clarity and consistency, minor inaccuracies or interpretation differences may exist. In case of doubt, the original Dutch version prevails.

Keywords: responsible gambling, duty of care, online casinos, player protection, gambling regulations.



# **Executive Summary**

This second annual Duty of Care Survey by Casino.nl focuses on how Dutch online gaming operators fulfill their legal and social responsibility to prevent gambling addiction. We examined to what extent 25 legal operators offer clear information, prevention tools and intervention measures on their websites.

#### Research method

- Breadth and depth: We established 37 mandatory criteria (based on laws and regulations) and 38 additional best practices. Participating websites were assessed from two perspectives: as a non-logged-in guest and as a logged-in player and using desktop and a mobile device..
- Sources and validation: In addition to analyzing public information and player accounts, operators were approached to provide feedback on preliminary findings. This revealed a clear variation in the level of cooperation and willingness to make adjustments.

#### **Key Findings**

- **Findability and Visibility:** Only half of the operators place a direct link to "Responsible Gaming" at the top of the page. The responsible gambling slogan "Wat kost gokken jou? Stop op tijd. 18+" (translation: what is the price of gambling to you? make sure you stop in time. 18+) is clearly visible on half of the sites; the other half limit this to the footer or advertisements.
- **Education about addiction:** The basics information about minors being excluded and the Cruks exclusion register are mentioned almost everywhere. However, more in-depth explanations about gambling addiction (symptoms, suicide risk, risk to the cognitive impaired) are often lacking. Only a minority of operators offer thorough information on the causes and severity of addiction.

#### • Prevention & Tools:

- Limits: All operators offer deposit and time limits in accordance with the law.
- Self-tests: While each operator has a (often basic) self-test, the quality and presentation (e.g., via video or interactive elements) varies widely.
- Risk indication per game: Less than half show a clear risk matrix or explanation of which games carry higher risk.
- **Intervention:** Nearly all operators state that they may intervene in cases which show concerning gambling behavior, but few are specific about which signals trigger action or how they reach out and intervene.



• **Variety in collaboration:** Some operators responded extensively, sharing their views and seeing the survey as an opportunity to improve policy. Others did not respond or declined to cooperate substantively.

#### Conclusions

- **Mixed compliance:** Most operators meet minimum requirements, but notable gaps remain highlighting a lack of uniformity and suggesting limited monitoring or enforcement.
- **Positive developments:** In some areas (such as referrals to Cruks and the setting of limits), the industry has shown consistent improvement compared to our 2024 survey. Some operators also stand out with comprehensive educational materials and strong visual tools. There are also operators that excel in comprehensive education and visual aids.
- Lack of monitoring and enforcement: While most operators comply with legal minimums, not all do. This issue was already observed last year, and the fact that it persists suggests inadequate oversight and enforcement, allowing shortcomings to go unaddressed.
- Room for improvement: No platform achieved a perfect score. There are numerous points of improvement that we think are important and would contribute to better duty of care.

#### Recommendations

#### Operators:

- Follow a clear checklist and ensure key information is prominently displayed (e.g., always include a clearly visible button linking to "Responsible Gambling" content at the top of the page).
- Offer more variety in education (video, infographics) and be specific about intervention criteria.
- Take coordinated steps toward standardizing risk classifications across different types of games.

#### Policy makers and regulators:

- Define clear minimum standards for the depth and quality of responsible gambling information.
- Encourage clear and easy recognition of legal operators

With these findings and recommendations, the Duty of Care Study 2025 shows that the Dutch market is making strides in responsible gaming. However, it also makes clear that both operators and regulators still have work to do in strengthening



education and preventing gambling addiction. The key lies in more visible education, consistent preventative measures, and concrete interventions—supported by strong collaboration and clear legislation.



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# Introduction

Since the legalization of the gambling market in the Netherlands, the duty of care of gambling operators has undeniably taken a center stage. This duty of care means that operators must do everything in their power to prevent and minimize gambling addiction.

In practice, this means that online casinos and bookmakers must take measures to protect players from excessive participation and possible gambling addiction. Our research in 2024 as well as earlier signals from the Kansspelautoriteit (Ksa) and independent studies have shown that not all licensed operators are fulfilling this responsibility adequately. For example, in 2023 the Ksa found that many online operators fail to intervene quickly or effectively in cases of risky gambling behavior<sup>1</sup>. This raises the question to what extent operators have implemented and communicated the prescribed measures to players.

Casino.nl is an affiliate website that focuses on responsible gambling in order to inform consumers as honestly and transparently as possible about gambling. To fulfill this mission, we conduct an annual survey on how operators fulfill the duty of care. This is the second time we have conducted a duty of care survey. Conclusions from our previous duty of care survey<sup>2</sup> were that several casinos have a sound duty of care policy and comply with the legal requirements, with Holland Casino, TOTO, Tombola, Jacks.nl and LeoVegas tied at the top. At the same time, the low scores of ZEbet and Vbet, among others, showed that there is still much room for improvement in several areas to adequately protect players. This year we set up our research differently but the research question remains unchanged:

Research question: How are licensed gambling operators in the Netherlands implementing their duty of care? In which areas are they performing well, and where are they falling short?

This question remains highly relevant for both regulators and the industry itself. This report builds on previous findings and provides an overview of the situation at the end of 2024 and the beginning of 2025. We examine the visible implementation of the duty of care - such as the information provided and tools available on license holders' websites - in order to identify trends and key areas for attention.

<sup>&</sup>lt;sup>1</sup> Online gaming operators must intervene faster and better with potential problem players Sept. 12, 2023

<sup>&</sup>lt;sup>2</sup> Casino.nl duty of care investigation 2024



# Research method

#### Outline and sources:

For this study, we analyzed the "Responsible Gambling" information of 25 legal online gambling operators in the Netherlands (licensed under the KOA framework).

The primary source of data was the operators' websites, both publicly accessible (without login) and content available only to logged-in players. This analysis was conducted using a pre-prepared checklist (the questionnaire), which was based on the legal framework and recognized best practices in addiction prevention.

For the design of this study and the corresponding checklist (questionnaire), we created a legal framework with the help of a legal expert (see Appendix) based on the following documents:

- Gambling Act (Wok), including Remote Gaming Act (Koa Act).

  In force since April 1, 2021, six months before the first licensing. Among other things, this law forms the basis for the CRUKS (Central Register of Exclusion from Gaming) and other obligations around responsible gaming.
- Remote Gaming Decree (Koa).
   Effective July 15, 2022. Provides further clarification of the law with specific and detailed requirements, including mandatory gaming limits and measures to encourage more conscious gambling behavior.
- Gaming Recruitment, Advertising and Addiction Prevention Decree (VRA). Valid from July 1, 2023. Among other things, regulates the obligation of the warning phrase ("Wat kost gokken jou? Stop op tijd. 18+.") and prohibits non-targeted advertising.
- Regulation of Playing Limits and More Conscious Play.

  Effective date Oct. 1, 2024. Introduces new national deposit limits and monitoring obligations for playing behavior.

#### Analysis frameworks:

A set of 37 mandatory criteria was distilled from the legal framework that operators are required to meet at a minimum. These include:

- Clearly informing about risks of gambling and naming vulnerable groups (minors, self-exclusion through Cruks, high-risk groups).
- Providing information about gambling addiction and how to seek help.
- Offering prevention tools, such as adjustable playing limits (time, deposit, etc.) and exclusion options (temporary breaks, enrollment in Cruks).



- Transparency about the monitoring of player behavior what signals or behavioral patterns are being tracked, what data is stored, and what specific intervention measures are taken when potentially harmful gambling behavior is detected.
- Display of the mandatory warning message "Wat kost gokken jou? Stop op tijd. 18+" on the website.

In addition to the mandatory criteria, 38 additional (non-mandatory) items were included in the evaluation. These are considered best practices or extra measures that go beyond legal obligations and reflect a stronger commitment to responsible gambling. Examples include: delving further into features of gambling addiction (e.g., a comprehensive explanation of signs or negative consequences), offering self-tests or educational videos, additional limit options (such as loss limits) beyond the legal requirements, and placing the warning message more prominently on the website than strictly required.

#### Methods:

Commissioned by Casino.nl, two researchers created accounts at all licensed operators and independently reviewed the websites based on a pre-established checklist. We looked at both desktop and mobile versions of the websites from two perspectives: as a guest (without logging in) and as a player (logged in). We chose this because in the previous study we received comments from operators that we had only looked at desktop and that the information sought was available on mobile. In this way it is ensured that all relevant information and functions are mapped.

The findings were captured with screenshots and video recordings to support evidence and for possible later consultation. After the data were collected, we gave operators the opportunity to review our findings and provide feedback where necessary. Based on this, we corrected the data where necessary.

## Scoring methodology:

For each operator, we assessed whether each of the 37 mandatory criteria was present (score 1) or absent (score 0), as well as the presence of the 38 additional (non-mandatory) best practice items. We counted how many of these optional best practices were implemented by each operator. This resulted in a quantitative profile per operator, showing the number of mandatory criteria met (out of 37), along with the number of additional best practices adopted (out of 38). In addition, we made qualitative notes for each operator based on specific observations. Although not all criteria carry the same weight in terms of actual player protection, this approach provides an objective overview of each operator's compliance level and efforts toward responsible gambling.



#### Reclassification of questions:

For a more logical analysis, we rearranged the questions based on three themes:

#### Education (information)

- Information about gambling addiction
  - What is addiction (8.1)
  - Symptoms of addiction (8.2)
  - Possible negative consequences of addiction (8.3)
- Risks of gambling addiction (3)
- Who should be excluded from games of chance (1)
- Other factors risk groups (8.3.5)
- Risk of games (2)
- Possible consequences of gambling addiction (8.3)
- Referral to help agencies (4; 5)
- Findability information
- Differences mobile and desktop, and logged in or not (meta analysis)

#### Prevention

- Information on what constitutes responsible gambling (6)
- Information responsible gambling in neutral environment (18)
- Use the word mark 'Wat kost gokken jou? Stop op tijd. 18+ (19)
- Setting limits (9)
- Understanding player behavior (17)
- Monitoring player behavior (7.2; 10; 13; 14)
- Self-test (7.1)
- Exclusion of games of chance (11)

#### Intervention

- Information on criteria for intervention (15)
- Information on type of intervention (16)
- Reference to Cruks (12)



# Research limitations.

Some methodological limitations must be considered when interpreting the results:

Focus on communication, not implementation: This study focused on what operators say and offer on their websites, rather than how the duty of care is implemented in actual practice. In other words, we examined the policies and tools as they are presented to (potential) players. Whether and how effectively operators actually intervene in cases of problematic behavior was outside the scope of this research. A operator may present everything correctly on paper but still respond slowly or inadequately in practice—or conversely, may not explicitly communicate certain actions online while handling them well behind the scenes. Therefore, the findings should be viewed as an indicator of compliance and intent, rather than as proof of real-world outcomes.

**Snapshot:** The data was collected from October 2024 through January 2025 with checks, additions and corrections in February and March 2025. This provides a snapshot. The online gaming market is dynamic; operators regularly adjust their websites, for example in response to new legislation, incentives from the regulator or their own insights. It is possible that certain shortcomings have since been corrected (after our measurement).

**Public information only:** We limited ourselves to accessible information on the website. It cannot be ruled out that an occasional reference was hidden somewhere out of context where you would expect it, for example in an email to a player or a blog post on the site. We consider the impact of this to be small for the mandatory points, as they should normally be clearly stated in the responsible gambling section of the website.

**Interpretation of criteria:** Although we used a strict checklist, assessment sometimes required interpretation. For example, does a sentence like "some games pose a higher risk" count as a sufficient fulfillment of "distinguishing between high-risk and low-risk games"? It is a qualitative judgment whether something was communicated "sufficiently clearly" or not.

No Weighting of Criteria Importance: In the scorecard, all missing mandatory points were counted equally. This provides an objective total score, but it does not account for the relative importance of each criterion. For example, a missing warning slogan could arguably be more significant than the absence of information about cognitive impairments—since the former represents a direct legal violation and is publicly visible. However, in our scoring, both are simply recorded as one missed point. As such, the total scores should be interpreted as a measure of completeness, not necessarily of the severity or significance of the missing elements. To address



this, we have tried to contextualize the importance of certain gaps in the discussion—recognizing that some omissions are more serious than others.

Limited scope of best practices list: The list of non-mandatory "extra" items is not exhaustive. We inventoried the most common extra measures at our discretion, but there may be aspects that were not in our list. For example, if a casino does something unique, that may not have been included. In practice, we did not encounter this; most extras fell neatly into our categories. Still, we may not have done full justice to a single operator initiative in the quantitative count. We have named this qualitatively where relevant.

**Exclusion of ScoriPro:** ScoriPro, the fantasy sports operator, was ultimately not included in this study. We realized relatively late in the process that they were missing from our list of operators. This may be because we at Casino.nl focus on casino and bookmakers and does not pay much attention to fantasy sports. On top of that, ScoriPro indicated by email that they wanted to refrain from feedback and cooperation. In order not to exceed our timeline and research capacity, we decided not to include them in the research. This decision was based solely on practical considerations and does not imply any judgment about their compliance with the duty of care.

**Human error:** Although we have collected our data with great care, it cannot be excluded that things have been overlooked and/or mistakes have been made in recording the data. Therefore, we would like to emphasize that if we have indicated that we have not found something, that is no guarantee that the information sought is actually absent. Therefore, a "0" in the score means that our researchers could not easily find it while studying the content on the website, specifically the responsible gaming content as well as the terms and conditions.

Despite these limitations, the results provide a useful and up-to-date picture of how Dutch online gaming operators fulfill their duty of care to players. The main trends and conclusions below should be read with the above nuances in mind.



# **Findings**

In this chapter, we present the main results of the study. We answer the following questions in turn:

- 1. Desktop vs. mobile: How does responsible gambling information differ between desktop and mobile versions of the websites, and to what extent does it change depending on whether a user is logged in or not?
- 2. Collaboration with operators: How did operators cooperate in this study?
- 3. Visibility: How visible is the responsible gaming content to players?
- 4. Education: What are the findings (including definition and explanation of addiction and risks)?
- 5. Prevention: What are the findings regarding information and resources for prevention (including limits, self-tests)?
- 6. Intervention: What are the findings regarding information and resources for prevention (including monitoring of playing behavior, communication with problem players)?

This is followed by a discussion, in which we elaborate on matters that struck us, including the risk matrix per game type, the impact of comprehensiveness of information, the usefulness of mere text communication, and the question to what extent "naming" actually leads to better implementation of the duty of care. Finally, we present our Conclusion and offer Advice to all stakeholders involved in the gambling sector.

#### Discretion

To ensure discretion and avoid unnecessary publicity surrounding individual operators, we do not publish complete data by operator in this report. Each operator will have the opportunity to see their own results. The exception is information about which operator chose to collaborate and provide feedback and which did not respond or decided to abstain.

In the appendix, we indicate for all questions how many operators did and did not find the information, but without mentioning specific company names. This allows the industry as a whole to learn lessons, while individual operators remain protected.



Difference between desktop/mobile and logged in/not logged out

Results

#### Desktop vs. mobile

For 24 of the 25 operators, we found no differences in content between the desktop and mobile sites. The same information was offered and the pages were fairly similar in structure. The exception was one casino where the mobile site had noticeably less comprehensive information about responsible gaming; some text was only accessible on the desktop version because the menu on mobile differed significantly.

## Guest (not logged in) vs. logged in

With most operators, the responsible gaming content remained the same regardless of login status. We found one exception where as a guest we could not find direct links to external help sites, while those same links did appear when we were logged in. This was also true for some specific points around legal consequences of gambling addiction.

The fact that a operator displays certain information only to logged-in users can make potentially vulnerable players (who visit the site exploratory first) less likely to find appropriate help or alerts. For mobile users, the danger is that information sometimes gets lost in a sub-menu or footer.



## Cooperation during research

We approached the 25 surveyed legal online gaming operators with our preliminary research results and the findings we had gathered from their websites. Their responses varied widely:

#### No response received

Bet365, ComeOn, Kansino, ZEbet: These parties have not responded to our emails and reminders, so we have not received any additional clarification or correction from their side.

#### Response but no substantive feedback

Lucky7 Casino and One Casino sent a short response, but indicated that they did not want to give substantive comments and would abstain. Bingoal, Holland, Jacks.nl, TOTO, Unibet: only acknowledged receipt without giving substantive comments or corrections.

#### Yes: feedback received

The following operators provided constructive feedback and corrected factual inaccuracies in our findings where necessary: 711 Casino, BetCity, BetMGM, Betnation, Casino777, Circus, Fair Play, GGPoker, Goldrun, Hard Rock, Hommerson, LeoVegas, Tonybet, Vbet

Within that, we had extensive video interviews with *Tonybet, Hard Rock Casino, Nsus/GGPoker, LeoVegas/BetMGM, Fair Play* and *Betnation*. They shared their views on responsible gambling in detail and indicated that they greatly appreciated our research as an incentive to continually sharpen their duty-of-care policies.

yes: received feedback	711 Casino, BetCity, BetMGM/LeoVegas, Betnation, Casino777, Circus, Fair Play, GGPoker/Nsus, Goldrun, Hard Rock Casino, Hommerson, Tonybet, Vbet,
yes, response, no feedback	Bingoal, Holland Casino, Jacks.nl, TOTO, Unibet
reaction but abstinence	Lucky7, OneCasino
no response received	Bet365, ComeOn, Kansino, ZEbet

This diverse response shows the extent to which operators feel engaged in the topic of duty of care and in the quality of their accountable gaming communications. Overall, it appears:



Active collaboration (feedback, video calls) shows an ambition to improve policy and an openness to criticism. That a number of operators even scheduled a video interview to go deeper into their prevention and intervention policies confirms that some parties want to do more than just meet the minimum legal requirements. The resulting engagement and dialogue are an important step towards a higher level of player protection in the Dutch gaming market.



# Visibility of responsible gaming content

#### Results

We specifically looked at whether the website has a permanent, clear "Responsible Gambling" or "Responsible Gaming" button or link at the top of the page, without requiring the player to scroll or search through complex menus.

- 12 of the 25 operators had a visible "responsible gaming" or "responsible gaming" menu item "above the fold."
- For the remaining 13, the link was tucked away in a footer and/or submenu

In addition, we discovered that:

- Great differences existed in how "conspicuous" this visible link was. At some sites it was clearly visible, at others in a small font and less visible....
- About half of the sites displayed the warning phrase "Wat kost gokken jou? Stop op tijd. 18+" above-the-fold on the website. The other half placed it only in the footer and/or with promotional content.

## Interpretation

If this content is not easily findable, at-risk players may not see these warnings or resources. For education to be effective, it must be accessed quickly and easily.

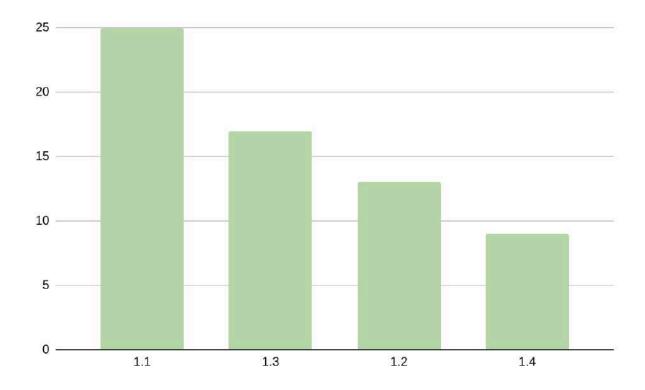
YES	Bet365, BetCity, Betnation, Bingoal, Circus, Fair Play, GGPoker, Hard Rock, Holland Casino, Tonybet, TOTO, Unibet
NO	711 Casino, BetMGM, Casino777, ComeOn, Goldrun, Hommerson, Jacks.co.uk, Kansino, LeoVegas, Lucky7, OneCasino, Vbet, ZEbet



# Findings on information

By "education" we mean, among other things, explanations of gambling addiction, risk groups, risk games and where to go for help. We noted:

All operators explicitly named minors as an excluded group (question 1.1, required by law). The other defined groups (1.2, 1.3 and 1.4) to whom no games of chance may be offered were not specifically named by all: persons exhibiting risky gaming behavior 13x; persons who have excluded themselves from gaming 17x; and persons with cognitive disabilities 9x



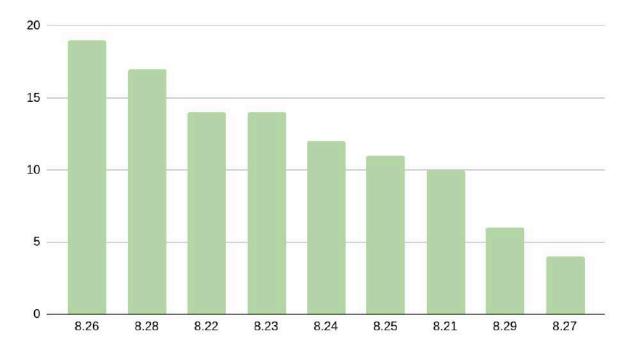
1.1	- Minors	25
1.2	- Persons exhibiting risky gaming behavior	13
1.3	- Persons who have excluded themselves from gaming	17
1.4	- Persons with cognitive disabilities	9

14 out of 25 explain that addiction is characterized by an uncontrollable urge to keep gambling (8.12) despite negative consequences. 7 refer to it as a "chronic and progressive condition" (8.11).



The most frequently mentioned symptoms of gambling addiction (8.2) are:

- Lying to family members, friends or others to hide the extent of gambling 19x;
- Loss of important relationships, job, educational or career opportunities due to excessive gambling 17x
- other symptoms were mentioned much less frequently



Graph: symptoms of gambling addiction

ref	question	number
8.21	- Constantly thinking about gambling and planning how to obtain more money to gamble	10
8.22	- Placing higher and higher bets to feel the same tension (tolerance)	14
8.23	- Attempts to stop gambling or control it have failed.	14
8.24	- Restlessness or irritability when trying to stop gambling.	12
8.25	- Gambling to escape problems or unpleasant feelings (e.g., guilt, anxiety, depression).	11
8.26	- Lying to family members, friends or others to hide the extent of gambling.	19
8.27	- Engage in illegal acts (e.g., forgery, fraud, theft) to obtain gambling funds.	4
8.28	- Loss of important relationships, job, educational or career opportunities by gambling too much.	17
8.29	- Relying on others to provide money to get through a desperate financial situation caused by gambling.	6



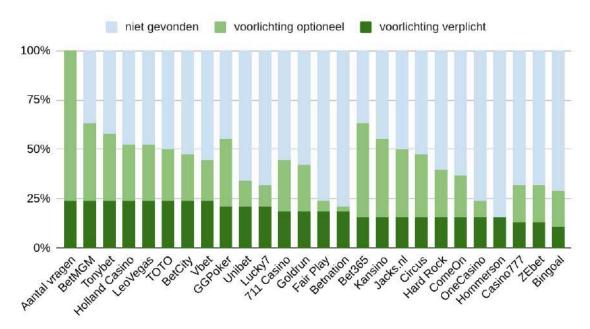
No operatorexplicitly mentions suicidal thoughts or behavior as a possible consequence.

Game risk definition: 16 of 25 distinguish high and low risk games; only 7 refer to a risk matrix (such as Asterig). Only 4 show a risk matrix. Interestingly, the risk ratings for the different game categories are classified in 3 different ways. (See appendix games risk matrix)

#### Interpretation

The basic information (minors and Cruks) is mentioned everywhere, but when it comes to further explanation of exactly what addiction means - and what (psychological) consequences there may be - we see reticence. Possibly operators find it difficult or too confrontational to be explicit.

The chart below shows how different operators score relative to each other in the information provided.



Graph: 'voorlichting' - how operators score with regards to providing objective information

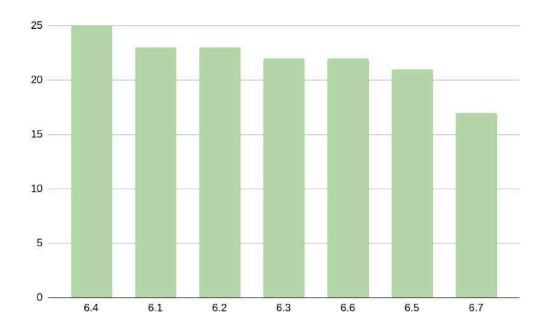


# Findings on prevention

In prevention, we looked at information on responsible gambling, limits, self-tests and behavior monitoring, among other things:

Information on responsible gambling:

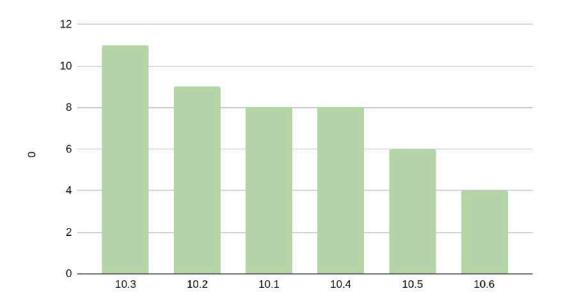
- All operators offer deposit limits, balance limits and time limits, as required by law.
- "Don't play under the influence" was mentioned the least often, but still by 17 operators.



ref.	question	number
6.1	- Determine budget	23
6.2	- Only play with money you can spare	23
6.3	- Don't borrow money, don't play on credit	22
6.4	- Setting limits	25
6.5	- Not playing to win back lost money	21
6.6	- Breaks	22
6.7	- Do not play under the influence	17



- Self-tests: The 25 licensees surveyed all offer a self-test. In most cases, this is a simple list of questions. Only a few make this test a visual or interactive element such as <u>Mindway Ai Gamalyze</u>.
- Understanding players gambling behavior: With all operators, logged-in players can fairly easily see how much time and money they have spent, as required by law.
- Monitoring players behavior: To the question, "Does the gaming operatorindicate that various aspects of player behavior are monitored?" (10), we found remarkably often no information. See table below. 21 operators do indicate that data on player behavior is stored (13), 18 operators indicate that player behavior is used for early detection (14) but details on what player behavior is monitored (10) we found clear information in less than half of the operators.



Graph: Monitoring player behaviour

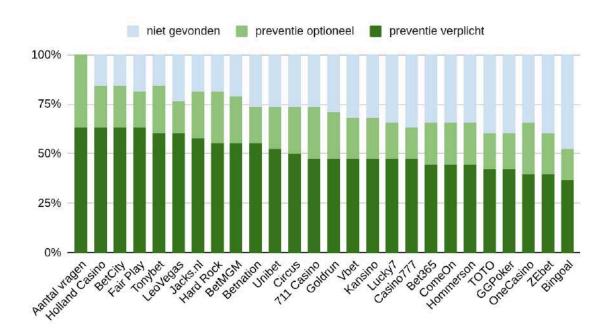
10.1	- Player behavior exceptional moments	8
10.2	- Player behavior longer play sessions	9
10.3	- Player behavior higher stakes	11
10.4	- Repeated replenishment	8
10.5	- Adjusting limits	6
10.6	- Requests for bonuses	4



#### Interpretation

The law guarantees that a basic set of prevention information and tools are present, but the elaboration varies greatly in ease of use and clarity. This was evident earlier in part from how visible the responsible gaming content is. And now again in how comprehensively responsible gambling and behavioral monitoring is explained. It gives a picture of how transparently and proactively the duty of care is carried out

The table below shows the information found and not found that deals with prevention.



Graph: information on prevention



# Findings on intervention

This aspect revolves around how operators intervene when gaming behavior is of concern. We asked the following questions:

- Under what circumstances are intervention measures taken (15)?
- What intervention measures will be taken (16)?
- Does the gaming operatorprovide information about exclusionary options through Cruks (11.2) and links to Cruks (12.1)?

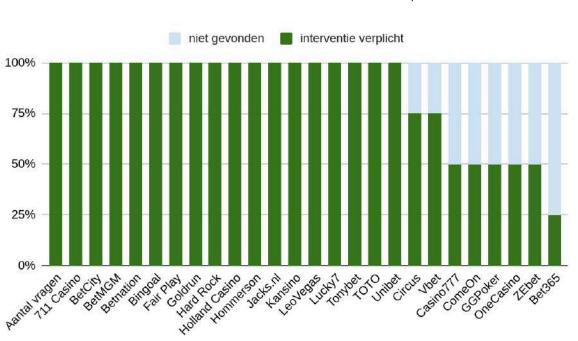
#### We saw:

- 19 out of the 25 operators mention in some form that interventions may occur
  when problematic behavior is detected, but 16 of them do not provide
  concrete details about what those interventions entail. Additionally, 8
  operators do not clearly specify which signals (e.g., repeated deposits,
  gambling through the night) would trigger such an intervention,.
- All 25 operators refer to Cruks, but with one the link to Cruks website did not work.

## Interpretation

There seems to be a reluctance to make explicit how and when to intervene. During the feedback round, we heard from some operators that they think too much transparency undermines the effectiveness of monitoring. Others pointed out that it would not be mandatory to share the exact criteria publicly. For the player, however, it often remains unclear how to intervene when things threaten to go wrong.

The following chart shows which operators had positive responses to the four questions regarding prevention.



Graph: information on intervention



# Discussion

In this section, we dive deeper into some recurring themes.

#### Game risk matrix

We saw that operators handle the risk classification of games very differently. Only a few use an official model (Asterig), others only broadly state the difference in risk for different games. This lack of uniformity can lead to confusion; players do not always receive a clear or consistent indication of which games are high-risk.

#### How extensively addiction and risk are adressed

Although the law requires operators to mention risks, there is no strict standard for how in-depth that information must be. As a result, some sites merely state that risks exist, while others provide more detailed information and explicitly name specific risks. Whether a brief explanation has any real impact is questionable; on the other hand, overly lengthy text may go unread.

#### Role of other media besides text

Most operators rely on blocks of text, occasionally accompanied by a few icons. The few who do use videos, infographics, or interactive media give the impression that they are making an extra effort and acting in line with the spirit of the law. Visual and interactive content can contribute to better communication.

#### How useful is merely naming something?

This raises the question of whether simply "mentioning" risk factors, vulnerable groups, or support services truly leads to effective protection. If someone with a cognitive impairment cannot understand the text, then it is worth questioning the value of stating on the site that such individuals are excluded from participation. At the same time, not naming these elements is not an option either. This highlights the tension between compliance (following the rules by naming the required elements) and effectiveness (actually reaching and helping the player)...

#### Naming Is no guarantee of proper execution

Whether operators actually intervene in practice, respond adequately, and offer a warm handoff to support services is not something this research can determine. For example, a operatormight communicate very well but be slow to act on risky gambling behavior in practice—and vice versa.



# Conclusion

Most operators meet the minimum legal requirements, but not all do. This was also observed in last year's study, and the fact that it remains the case a year later suggests that there is insufficient monitoring or enforcement, allowing these shortcomings to go unnoticed or unaddressed.

No operatoroffers a completely "perfect" package of information, tools, and transparency. However, it also appears that such a standard has never been clearly defined. This highlights that there is still significant room for improvement when it comes to the quality and clarity of information aimed at protecting players.

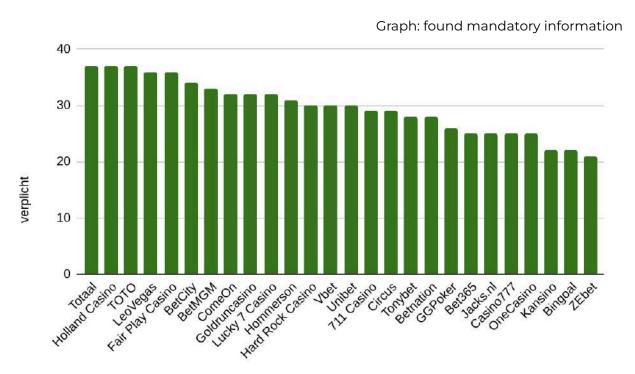
## Comparison with 2024 survey

Although we ask different questions and use a different scoring method—making a direct one-to-one comparison impossible—we still feel confident drawing the following conclusions in comparison to the results of our previous study:

- Everyone refers to Cruks in a clear way and allows players to set limits
- ZEbet still scores very low
- Vbet now scores significantly better

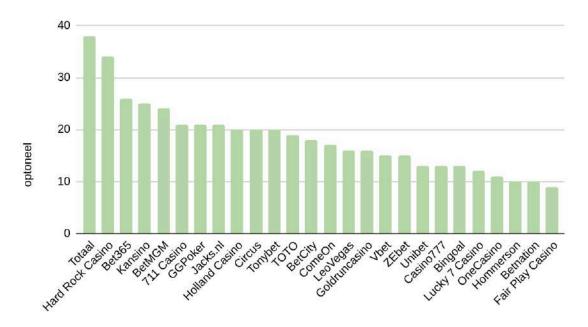
#### Kudos to the best in each category

**Overall mandatory content:** Holland Casino and Toto are the only operators where we were able to find all mandatory information. Nice to see the state-owned companies leading by example in regards to this aspect.



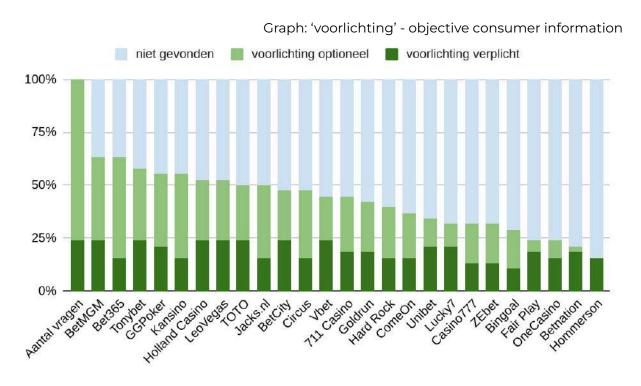


**Overall optional content:** Hard Rock Casino stands out and is clearly the most proactive and clear in providing information to support its duty of care.



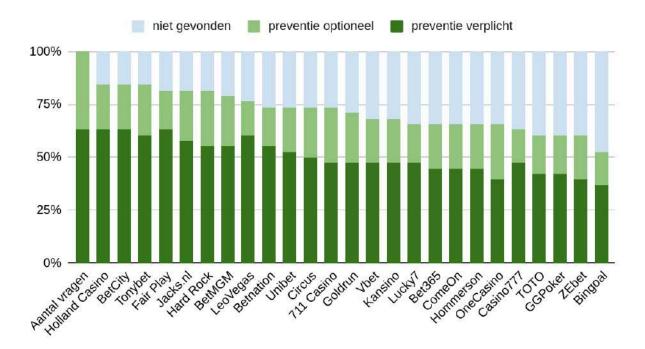
Graph: found best practice / non mandatory information

**Information**: The following operators provide significantly more educational information than their peers: BetMGM, bet365, Tonybet, GGpoker, Kansino, Holland Casino, LeoVegas, TOTO and Jacks.nl.





**Prevention**: Holland Casino, BetCity, Tonybet, Fair Play and LeoVegas score highest on information provision



Graph: scores on prevention

Extra kudos to operators who provide information using media other than just text:

- Visual representation risk games matrix: BetMGM, LeoVegas, Betcity, Kansino, Holland Casino
- Make use of video in their responsible gaming content: Betcity, Hard Rock Casino.
- Interactive self-test: Holland Casino (Mindway Gamalyze)



# Observations and Suggestions

In this final chapter, we want to share some suggestions for operators and policymakers based on our observations.

#### Make a checklist and do annual audits

operators interpret the duty of care in different ways because it contains no clear instructions and is free for interpretation. The various stakeholders can jointly make a clear checklist and then check annually, according to this list, whether all required components are demonstrably present and findable for players. Periodic audits based on this checklist ensure that the policy remains up-to-date and that best practices are identified.

#### **Use a Template for Duty of Care Communication**

This research has given us a clearer idea of what the minimum level of player education should include. We have translated these insights into a "Duty of Care Communication Template." This document outlines, in a clear and consistent way, the essential information a player should have before engaging in online gambling information that raises awareness of the risks of gambling and the operator's duty of care. Gambling operators, as well as their affiliates, can use this template to consistently communicate their duty of care. By adopting a uniform message towards players, we can help improve the effectiveness of education and prevention efforts across the industry.

#### A Central Place for Duty of Care Content

Without shifting the responsibility away from operators to properly educate their users, the creation of a central online hub - designed specifically for the target audience - could also play a valuable role. This platform would present clear, accessible information about addiction, risks, prevention, intervention, and available support services, all in one place and free from mixed messaging. Currently, websites run by the central government, the Dutch Gambling Authority (Ksa), Cruks, and the Gambling Stop campaign are primarily focused on discouraging gambling. While this is understandable, it may not be the most effective approach for individuals who are already inclined to gamble and are looking for balanced, practical, and non-stigmatizing information. A good example of such a more targeted approach is the recent initiative Eerlijk over gokken.

#### Make the legal status of operators clearly identifiable

It has been concluded several times that many players cannot distinguish between a legal and illegal operator. A survey by us in 2024<sup>3</sup> showed that licensees do not unambiguously use the wordmark or link to their license on the gaming authority's

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<sup>&</sup>lt;sup>3</sup> https://www.casino.nl/hoe-herken-je-legaal-online-casino/



page. The regulations should therefore provide clear strict instructions on how each licensee must clearly, at the top of each page (above the fold) carry the logotype that links to the operator's license page on the gaming authority website.

#### Make use of alternative media formats

People read poorly, and it is well known that general terms and conditions are generally accepted without reading them. Information that is important therefore benefits from being communicated in more ways than just text. Consumers and especially younger audiences want short, quick and visual information. Currently, only a few operators make use of this. Informing only through text indicates only compliance mentality. operators would do well to have their marketing department work with them to make responsible gaming content attractive and contribute to the brand image.

## Public campaigns and the role of players

Building on the previous point, a campaign is needed that familiarizes players with recognizing legal operators versus illegal ones. It is important that this is done in a way that does not further contribute to the normalization of gambling as it has occurred in recent years through advertising rules. The normalization of (online) gambling requires public campaigns that clearly emphasize:

- The risks of gaming AND excessive player behavior.
- The dangers of illegal operators beyond any oversight.
- How to recognize a licensed operator.

A good example of the kind of tone and approach that could work is the SIRE campaign "Vrij Veilig" about condom use—"If you're going to do it, do it safely." A similar message, using humor and relatability, aimed particularly at young players, could be highly effective in promoting safer gambling habits and raising awareness about legal versus illegal operators.

#### Discourage playing at illegal operators

At the same time, perhaps consequences should also be considered for players who choose the illegal offerings. In the past, the Ksa communicated that "if you gamble at an operator without a license you risk a fine of 8,700 euros. If the judge punishes you, you will also receive a criminal record." However, this text was removed in March 2023.

A player currently sees only "advantages" of playing at illegal operators (simple KYC, no limits, more bonus, crypto, etc.) and disadvantages of the legal Dutch operators.

<sup>&</sup>lt;sup>4</sup> Internet Archive, website gaming authority Oct. 18, 2021



Appealing to players' responsibility will probably not be enough to convince a player not to choose the illegal offerings. If a player knows he runs the risk of a fine and criminal record, that may be a reason for players to choose the legal offer.

#### Work toward uniform risk classification

At many operators, there is a lack of clear information about which games carry higher levels of risk. Among those that do provide such information, the categorization of games varies, even when using the same methodology. This inconsistency can lead to confusion for players. An unambiguous common, industry-wide, risk matrix that everyone uses is needed. Uniformity reduces the chance of confusion and shows that the industry is taking responsibility. On our web site we provide extensive information about the Asterig method along with a tool to calculate risk scores yourself. In line with this, it might be a good idea to mandatorily label each game with a clear risk label explaining the score.

#### A positive approach to responsible gambling

Finally, we want to emphasize that "responsible gambling" information need not consist only of warnings and discouragement. Casino.nl refers in this regard to our pilot project "MyStride Positive Play" - a tool that offers dopamine-managing mini-games as a preventive tool. This initiative shows that you can encourage desired playing behavior rather than just discourage undesirable behavior.

#### **Final comment**

The ambition and spirit of the duty of care largely depend on "voorlichting"—a concept deeply rooted in Dutch culture and one that has no exact equivalent in other languages. With 'voorlichting' is meant 'to shine light upon'. It comes down to providing objective information without the intent to shape opinion but to enable the recipient to form an opinion of their own. It reflects the Dutch tradition of freedom and responsibility: providing objective information so that individuals can make their own informed choices.

By working together—operators, affiliates, policymakers, industry organizations, and players—and by establishing clear and practical guidelines, the Netherlands has the potential to become a leading example in the field of responsible gambling policy, tackling a challenge that many countries around the world are still struggling to address.



# Epilogue

With this study, we sought to make a valuable contribution to the discussion surrounding the duty of care and the further professionalization of the legal gaming market in the Netherlands. By identifying both strengths and weaknesses, we hope to encourage operators, policymakers and other stakeholders to make further improvements.

In particular, we thank all participating operators for their cooperation and openness in providing feedback, as well as the researchers for their thorough and accurate analysis. At the same time, we emphasize that this report is a snapshot in time: the online gambling market and related regulations are constantly evolving, so information and practices can change rapidly. We therefore urge all stakeholders to continue the dialogue and continue to communicate any adjustments transparently.

While we have done our best to set out the duty-of-care principles clearly, we recognize the limitations of our research methodology and emphasize that actual policies in practice still need further exploration. We trust that the insights in this report provide a useful compass for a future in which responsible gambling and player protection remain at the top of the agenda.



# Appendix



# Questions and answers original order translated from Dutch

Dark green questions are mandatory according to legal framework. Light green questions are optional

The number on the right refers to the number of operators where we were able to find this information on the website.

	Inform about risks of gaming	
1	Does the gaming operatorindicate in an appropriate, clear and understandable manner, to which categories of persons may not be offered games of chance?	
1.1	Minors	25
1.2	Persons exhibiting risky gaming behavior	13
1.3	Persons who have excluded themselves from gaming	17
1.4	Persons with cognitive disabilities	9
2	Does the gaming operatorprovide information about the specific features of their gaming offerings, including features that may lead to addiction?	
2.1	Distinguishes between higher and lower risk games	16
2.2	Refers to a method used for the risk matrix	7
3	Does the gaming operatordisclose the risks of gambling addiction in their gaming offerings?	
3.1	Through text	23
3.2	Through other media (e.g., video, interactive elements)	5
3.3	Through links to external resources	12
4	Inform about what to do if gambling becomes/is a problem	
4	Does the gaming operatorindicate where players can go for help/information about gambling addiction from third parties active online in the Netherlands?	
4.1	Third parties active online in the Netherlands	25
5	Does the gaming operatorindicate where players can go for help/information about gaming addiction from third parties physically active in the Netherlands?	
5.1	Third parties physically active in the Netherlands	24
6	Does the gaming operatorprovide information about what exactly constitutes responsible gaming behavior?	
6.1	Determine budget	23
6.2	Only play with money you can spare	23
6.3	Don't borrow money, don't play on credit	22
6.4	Setting limits	25
6.5	Not playing to win back lost money	21



6.6	Breaks	22
6.7	Do not play under the influence	17
7	Does the gaming operatorprovide information about measures against addiction?	
7.1	Self test	25
7.2	Monitoring play behavior	23
8	Does the gaming operatorprovide information about what gaming addiction is and its possible negative consequences?	
8.1	Addiction is	
8.11	Chronic and progressive condition	7
8.12	Characterized by an uncontrollable urge to gamble despite negative consequences	14
8.2	Symptoms of Gambling Addiction:	
8.21	Constantly thinking about gambling and planning how to obtain more money to gamble	10
8.22	Placing higher and higher bets to feel the same tension (tolerance)	14
8.23	Attempts to stop gambling or control it have failed.	14
8.24	Restlessness or irritability when trying to stop gambling.	12
8.25	Gambling to escape problems or unpleasant feelings (e.g., guilt, anxiety, depression).	11
8.26	Lying to family members, friends or others to hide the extent of gambling.	19
8.27	Engage in illegal acts (e.g., forgery, fraud, theft) to obtain gambling funds.	4
8.28	Loss of important relationships, job, educational or career opportunities by gambling too much.	17
8.29	Relying on others to provide money to get through a desperate financial situation caused by gambling.	6
8.3	Possible Negative Consequences of Gambling Addiction:	
8.31	Financial Problems:	
8.311	Large debts or bankruptcy due to excessive gambling.	17
8.312	Sale of personal property to pay off gambling debts.	4
8.32	Health problems:	
8.321	Stress-related conditions such as headaches, stomach problems and insomnia.	5
	Depression, anxiety and other mental health problems.	12
	Self-harm or suicidal thoughts and behaviors.	0
8.33	Social Problems:	



0.331	Loss of relationships with family and friends.	11
8.332	Problems at work or school due to absences or reduced performance.	10
8.333	Feelings of isolation and loneliness.	3
8.34	Legal Issues:	
8.341	Getting involved in illegal activities to finance gambling addiction.	4
8.342	Arrests and legal fees resulting from criminal behavior.	1
8.35	A history of addiction in the family.	
8.351	Certain personality traits such as impulsivity.	1
8.352	Starting gambling at a young age.	0
8.353	Simultaneous existence of other addictions (e.g., alcohol or drug addiction).	0
8.354	Life stressors such as unemployment or relationship problems.	0
8.36	Prevention and Assistance:	
8.361	Information on where and how to seek help when gambling becomes a problem.	25
8.362	Contact details of addiction treatment facilities and helplines.	25
8.363	Encouragement to play responsibly and be aware of the dangers of excessive gambling.	23
	Tools for prevention	
۵	Does the gaming operatoroffer options to set limits when creating a new	
9	account, such as:	
	Time limits	25
9.1	·	25 25
9.1 9.2	Time limits	
9.1 9.2 <del>9.3</del>	Time limits  Deposit limits	
9.1 9.2 <del>9.3</del> 9.4	Time limits Deposit limits Bet limits	25
9.1 9.2 9.3 9.4 9.5	Time limits Deposit limits Bet limits Balance limit / automatic payout	25
9.1 9.2 9.3 9.4 9.5	Time limits  Deposit limits  Bet limits  Balance limit / automatic payout  Loss limits  Does the gaming operatorindicate that various aspects of gaming behavior	25
9.1 9.2 9.3 9.4 9.5 10	Time limits  Deposit limits  Bet limits  Balance limit / automatic payout  Loss limits  Does the gaming operatorindicate that various aspects of gaming behavior are tracked?	25 25
9.1 9.2 9.3 9.4 9.5 10 10.1	Time limits  Deposit limits  Bet limits  Balance limit / automatic payout  Loss limits  Does the gaming operatorindicate that various aspects of gaming behavior are tracked?  Play behavior exceptional moments	25
9.1 9.2 9.3 9.4 9.5 10 10.1 10.2 10.3	Time limits  Deposit limits  Bet limits  Balance limit / automatic payout  Loss limits  Does the gaming operatorindicate that various aspects of gaming behavior are tracked?  Play behavior exceptional moments  Play behavior longer play sessions	25 25 8 9
9.1 9.2 9.3 9.4 9.5 10 10.1 10.2 10.3 10.4	Time limits  Deposit limits  Bet limits  Balance limit / automatic payout  Loss limits  Does the gaming operatorindicate that various aspects of gaming behavior are tracked?  Play behavior exceptional moments  Play behavior longer play sessions  Playing behavior higher stakes	25 25 8 9 11
9.1 9.2 9.3 9.4 9.5 10 10.1 10.2 10.3 10.4 10.5	Time limits  Deposit limits  Bet limits  Balance limit / automatic payout  Loss limits  Does the gaming operatorindicate that various aspects of gaming behavior are tracked?  Play behavior exceptional moments  Play behavior longer play sessions  Playing behavior higher stakes  Repeated replenishment	25 25 8 9 11 8
9.1 9.2 9.3 9.4 9.5 10 10.1 10.2 10.3 10.4 10.5	Time limits  Deposit limits  Bet limits  Balance limit / automatic payout  Less limits  Does the gaming operatorindicate that various aspects of gaming behavior are tracked?  Play behavior exceptional moments  Play behavior longer play sessions  Playing behavior higher stakes  Repeated replenishment  Adjusting limits	25 25 8 9 11 8 6
9.1 9.2 9.3 9.4 9.5 10 10.1 10.2 10.3 10.4 10.5 10.6	Time limits  Deposit limits  Bet limits  Balance limit / automatic payout  Loss limits  Does the gaming operatorindicate that various aspects of gaming behavior are tracked?  Play behavior exceptional moments  Play behavior longer play sessions  Playing behavior higher stakes  Repeated replenishment  Adjusting limits  Requests for bonuses	25 25 8 9 11 8 6



11.2	Exclusion of gaming offerings through Cruks?	25
12	Does the gaming operatoroffer referrals for exclusionary options through the Cruks?	
12.1	Reference to Cruks.	24
	Requirements implementation duty of care	
13	Does the gaming operatordisclose in an appropriate, clear and understandable manner what data about the player's playing behavior is stored?	
13.1	Data on storing play behavior.	21
14	Does the gaming operatorindicate in an appropriate, clear and understandable way the signals used to identify dangerous gaming behavior early?	
14.1	Signals used for early signaling	18
15	Does the gaming operatorindicate in an appropriate, clear and understandable manner the circumstances under which intervention measures will be taken?	
15.1	Circumstances intervention measures.	17
16	Does the gaming operatordisclose in an appropriate, clear and understandable manner the intervention measures being taken?	
16.1	Indication of which intervention measures.	19
17	Does the gaming operatorprovide an easily accessible overview of the player's gaming behavior, indicating:	
17.1	The maximum duration of player interface access per day, week or month;	25
	The maximum duration of player interface access per day, week or month;  The maximum deposits into the gaming account per day, week or month;	25 25
17.2		
17.2 17.3 17.4	The maximum deposits into the gaming account per day, week or month;  The maximum balance in the gaming account;  What time it is in the Netherlands;	25 25 24
17.2 17.3 17.4 17.5	The maximum deposits into the gaming account per day, week or month; The maximum balance in the gaming account; What time it is in the Netherlands; The time elapsed since the last login (session duration);	25 25 24 25
17.2 17.3 17.4 17.5 17.6	The maximum deposits into the gaming account per day, week or month; The maximum balance in the gaming account; What time it is in the Netherlands; The time elapsed since the last login (session duration); Play account balance.	25 25 24 25 25
17.2 17.3 17.4 17.5 17.6	The maximum deposits into the gaming account per day, week or month; The maximum balance in the gaming account; What time it is in the Netherlands; The time elapsed since the last login (session duration);	25 25 24 25
17.2 17.3 17.4 17.5 17.6	The maximum deposits into the gaming account per day, week or month; The maximum balance in the gaming account; What time it is in the Netherlands; The time elapsed since the last login (session duration); Play account balance.	25 25 24 25 25
17.2 17.3 17.4 17.5 17.6 17.7	The maximum deposits into the gaming account per day, week or month;  The maximum balance in the gaming account;  What time it is in the Netherlands;  The time elapsed since the last login (session duration);  Play account balance.  Statement of gains and losses  Is information about responsible gaming and addiction provided in a neutral	25 25 24 25 25
17.2 17.3 17.4 17.5 17.6 17.7	The maximum deposits into the gaming account per day, week or month;  The maximum balance in the gaming account;  What time it is in the Netherlands;  The time elapsed since the last login (session duration);  Play account balance.  Statement of gains and losses  Is information about responsible gaming and addiction provided in a neutral environment? (games, betting options and promotions should not be visible)	25 25 24 25 25 25
17.2 17.3 17.4 17.5 17.6 17.7 18 18.1	The maximum deposits into the gaming account per day, week or month; The maximum balance in the gaming account; What time it is in the Netherlands; The time elapsed since the last login (session duration); Play account balance. Statement of gains and losses Is information about responsible gaming and addiction provided in a neutral environment? (games, betting options and promotions should not be visible) Information in a neutral environment. Is the slogan "What does smoking cost you? Stop in time. 18+ visible on	25 25 24 25 25 25
17.2 17.3 17.4 17.5 17.6 17.7 18 18.1	The maximum deposits into the gaming account per day, week or month;  The maximum balance in the gaming account;  What time it is in the Netherlands;  The time elapsed since the last login (session duration);  Play account balance.  Statement of gains and losses  Is information about responsible gaming and addiction provided in a neutral environment? (games, betting options and promotions should not be visible)  Information in a neutral environment.  Is the slogan "What does smoking cost you? Stop in time. 18+ visible on every page?	25 25 24 25 25 24 24



20	Additional	
20.1	links clearly above the fold, without having to click (on a menu) to responsibly played content	12
20.2	Were they willing to cooperate?	18
20.3	Have they given feedback	12
20.4	Were there inconsistencies between information on mobile and desktop?	1
20.5	Were there inconsistencies between information available when we visit the site as a guest or as a player and are logged in?	1



# Questions/answers sequence education, prevention, intervention

Dark green questions are mandatory according to legal framework. Light green questions are optional

The number on the right refers to the number of operators where we were able to find this information on the website.

	Information	
1	Does the gaming operatorindicate in an appropriate, clear and understandable manner, to which categories of persons may not be offered games of chance?	
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1.3	Persons who have excluded themselves from gaming	17
1.4	Persons with cognitive disabilities	9
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2.1	Distinguishes between higher and lower risk games	16
2.2	Refers to a method used for the risk matrix	7
3	Does the gaming operatordisclose the risks of gambling addiction in their gaming offerings?	
3.1	Through text	23
3.2	Through other media (e.g., video, interactive elements)	5
3.3	Through links to external resources	12
4	Does the gaming operatorindicate where players can go for help/information about gambling addiction from third parties active online in the Netherlands?	
4.1	Third parties active online in the Netherlands	25
5	Does the gaming operatorindicate where players can go for help/information about gaming addiction from third parties physically active in the Netherlands?	
5.1	Third parties physically active in the Netherlands	24
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8.11	Chronic and progressive condition	7
8.12	Characterized by an uncontrollable urge to gamble despite negative consequences	14
8.2	Symptoms of Gambling Addiction:	
8.21	Constantly thinking about gambling and planning how to obtain more money to gamble	10
8.22	Placing higher and higher bets to feel the same tension (tolerance)	14



8.23	Attempts to stop gambling or control it have failed.	14
8.24	Restlessness or irritability when trying to stop gambling.	12
8.25	Gambling to escape problems or unpleasant feelings (e.g., guilt, anxiety, depression).	11
8.26	Lying to family members, friends or others to hide the extent of gambling.	19
8.27	Engage in illegal acts (e.g., forgery, fraud, theft) to obtain gambling funds.	4
8.28	Loss of important relationships, job, educational or career opportunities by gambling too much.	17
8.29	Relying on others to provide money to get through a desperate financial situation caused by gambling.	6
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8.312	Sale of personal property to pay off gambling debts.	4
8.32	Health problems:	
8.321	Stress-related conditions such as headaches, stomach problems and insomnia.	5
	Depression, anxiety and other mental health problems.	12
	Self-harm or suicidal thoughts and behaviors.	0
	Social Problems:	
8.331	Loss of relationships with family and friends.	11
8.332	Problems at work or school due to absences or reduced performance.	10
8.333	Feelings of isolation and loneliness.	3
8.34	Legal Issues:	
8.341	Getting involved in illegal activities to finance gambling addiction.	4
8.342	Arrests and legal fees resulting from criminal behavior.	1
8.35	A history of addiction in the family.	
8.351	Certain personality traits such as impulsivity.	1
8.352	Starting gambling at a young age.	0
8.353	Simultaneous existence of other addictions (e.g., alcohol or drug addiction).	0
8.354	Life stressors such as unemployment or relationship problems.	0
8.361	Information on where and how to seek help when gambling becomes a problem.	25
	Prevention	
6	Does the gaming operatorprovide information about what exactly constitutes responsible gaming behavior?	



6.1	Determine budget	23
6.2	Only play with money you can spare	23
6.3	Don't borrow money, don't play on credit	22
6.4	Setting limits	25
6.5	Not playing to win back lost money	21
6.6	Breaks	22
6.7	Do not play under the influence	17
7	Does the gaming operatorprovide information about measures against addiction?	
7.1	Self test	25
7.2	Monitoring play behavior	23
8.362	Contact details of addiction treatment facilities and helplines.	25
8.363	Encouragement to play responsibly and be aware of the dangers of excessive gambling.	23
9	Does the gaming operatoroffer options to set limits when creating a new account, such as:	
9.1	Time limits	25
9.2	Deposit limits	25
9.3	<del>Bet limits</del>	
9.4	Balance limit / automatic payout	25
9.5	<del>Loss limits</del>	
10	Does the gaming operatorindicate that various aspects of gaming behavior are tracked?	
10.1	Play behavior exceptional moments	8
10.2	Play behavior longer play sessions	9
10.3	Playing behavior higher stakes	11
10.4	Repeated replenishment	8
10.5	Adjusting limits	6
10.6	Requests for bonuses	4
11	Provides the gaming operatorwith information on:	
11.1	Temporary "time outs" .	23
13	Does the gaming operatordisclose in an appropriate, clear and understandable manner what data about the player's playing behavior is stored?	
13.1	Data on storing play behavior.	21

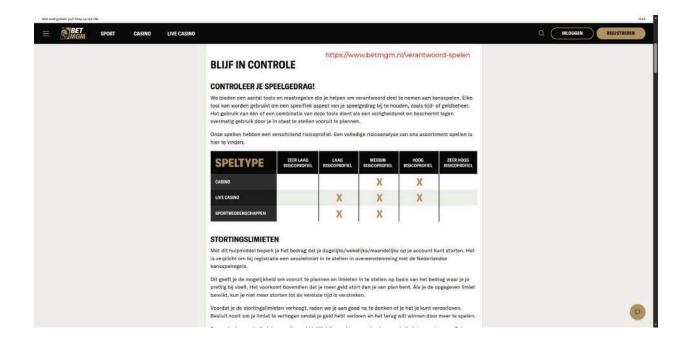


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14.1	Signals used for early signaling	18
17	Does the gaming operatorprovide an easily accessible overview of the player's gaming behavior, indicating:	
17.1	The maximum duration of player interface access per day, week or month;	25
17.2	The maximum deposits into the gaming account per day, week or month;	25
17.3	The maximum balance in the gaming account;	25
17.4	What time it is in the Netherlands;	24
17.5	The time elapsed since the last login (session duration);	25
17.6	Play account balance.	25
17.7	Statement of gains and losses	24
18	Is information about responsible gaming and addiction provided in a neutral environment? (games, betting options and promotions should not be visible)	
18.1	Information in a neutral environment.	24
19	Is the slogan "What does smoking cost you? Stop in time. 18+ visible on every page?	
19.1	'Above the fold'	12
19.2	In the footer	24
19.3	With each promotion	12
	Intervention	
11.2	Exclusion of gaming offerings through Cruks?	25
12.1	Reference to Cruks.	24
15	Does the gaming operatorindicate in an appropriate, clear and understandable manner the circumstances under which intervention measures will be taken?	
15.1	Circumstances intervention measures.	17
16	Does the gaming operatordisclose in an appropriate, clear and understandable manner the intervention measures being taken?	
16.1	Indication of which intervention measures.	19
20	Additional	
20.1	links clearly above the fold, without having to click (on a menu) to responsibly played content	12
20.2	Were they willing to cooperate?	18
20.3	Have they given feedback	12



20.4	Were there inconsistencies between information on mobile and desktop?	1
	Were there inconsistencies between information available when we visit the site as	
20.5	a guest or as a player and are logged in?	1

## Game risk matrix

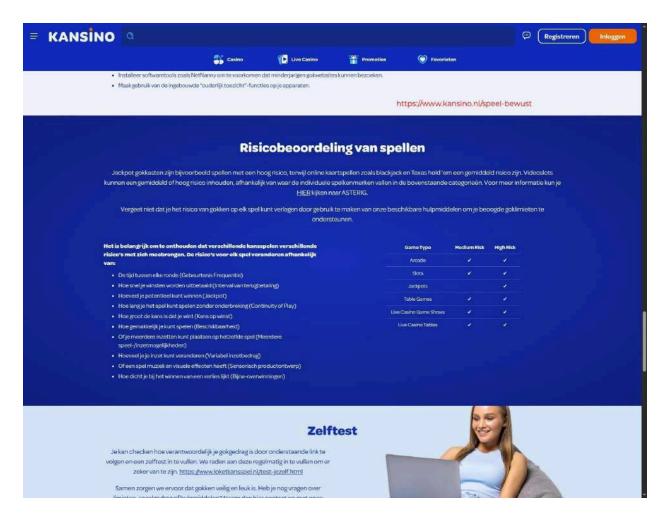




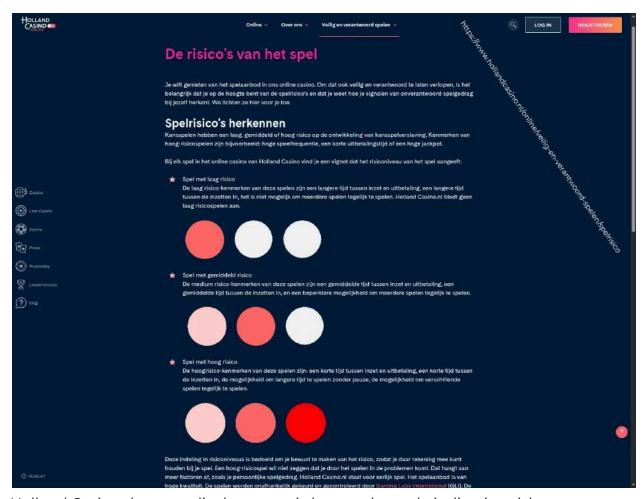


BETCITY.NL					
SPELTYPE	ZEER LAAG RISICOPROFIEL	LAAG RISICOPROFIEL	MEDIUM RISICOPROFIEL	HOOG RISICOPROFIEL	ZEER HOOG Risicoprofiel
PRE-MATCH BETTING				x	
LIVE BETTING				х	
LIVE BLACK JACK		Y N		x	
LIVE ROULETTE				X	
JACKPOT SLOTS					X
SLOTS		14		X	_
TAFELSPELLEN			-	X	









Holland Casino does not display a matrix but a color code indicating risk.



# Explanation of legislation by question

1

Does the gaming operatorindicate in an appropriate, clear and comprehensible manner, to which categories of persons may not be offered games of chance?

#### VRA decision art 8.1.a

Article 8.1.e: provides consumers with appropriate, clear and understandable information on at least the following topics: a.the categories of persons to whom gaming may not be offered;

Vulnerable persons:

Article 2.5 Vulnerable groups of persons.

Without prejudice to the provisions of article 2, subsection 3, Decree on the recruitment, advertising and prevention of addiction to games of chance, at least the following are considered vulnerable

- consumers with intellectual disabilities,
- consumers who have or have had in the past an addiction to gambling
- and consumers who have no more than the social minimum referred to in Article 2 of the Supplementary Benefits Act to spend.

Section 2 Decree on recruitment, advertising and addiction prevention for games of chance (source) 3:

Licensees do not focus their recruitment and advertising activities for games of chance on socially vulnerable groups of persons. Vulnerable groups of persons are in any case understood as minors and persons who display characteristics of risky gaming behavior.



Does the gaming operatorprovide information about the specific features of their gaming offerings, including features that may lead to addiction?

Source: <u>Decree WRV Par 2 Art 8</u>

B. the specifics of the games of chance it organizes;

C. the risks of gambling addiction associated with participation in the games of chance he organizes;"

2.1 Distinguishes between higher and lower risk games

#### Decision 26.1.21 Koa art 4.5

Section 8 Decree on the recruitment, advertising and addiction prevention of games of chance

1b: specific characteristics

2.2.3. Risk analysis gaming offer: In order to prevent gambling addiction, a licensee di e offering remote games of chance or games of chance in gaming casinos or slot machine halls must apply a risk analysis to its gaming offerings. Using this analysis, the licensee identifies the addiction risk potential of its gaming offerings for gambling addiction. It must adjust its addiction prevention policy accordingly.



Does the gaming operatordisclose the risks of gambling addiction in their gaming offerings?

#### Decree WRV Par 2 Art 8 c

c.the risks of gambling addiction associated with participation in the games of chance organized by him;

## 3.1 Through text

#### VRA decision art 8.1.a

Section 8 Recruiting, Advertising and Addiction Prevention of Games of Chance Decree Section 2. Information and Facilities,

Article 8.1: The holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade or to organize remote gaming shall provide consumers with appropriate, clear and comprehensible information on at least the following topics:

C: the risks of gambling addiction associated with participation in his organized games of chance;



Does the gaming operatorindicate where players can go for help/information about gambling addiction from third parties active online in the Netherlands?

#### Decree VRA Par 2 Art 8 g

g.addiction care and anonymous help available in the Netherlands;

4.1 Third parties active online in the Netherlands

#### WRV decision art 8

Section 8 Gambling Recruiting, Advertising and Addiction Prevention Decree Section 2 Information and Facilities, Section 8. Section 1: The holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade or to organize remote games of chance shall provide consumers with appropriate, clear and comprehensible information on at least the following topics:

> G: addiction care and anonymous help available in the Netherlands;

2: The licensee shall also provide access in a clear and understandable manner to:

A: the websites of one or more online operating institutions for addiction care, of one or more online operating institutions for anonymous help with gambling addiction, of one or more physically operating institutions for addiction care and of one or more physically operating institutions for anonymous help with gambling addiction;



Does the gaming operatorindicate where players can go for help/information about gaming addiction from third parties physically active in the Netherlands?

#### Decree VRA Par 2 Art 8 g

g.addiction care and anonymous help available in the Netherlands;

5.1 Third parties physically active in the Netherlands

#### WRV decision art 8

Section 8 Gambling Recruitment, Advertising and Addiction Prevention Decree Section 2 Information and Facilities, Section 8. Section 1: The holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade or to organize remote gaming shall provide consumers with appropriate, clear and comprehensible information on at least the following topics: > G: addiction care and anonymous help available in the Netherlands;

2: The licensee shall also provide access in a clear and understandable manner to:

A: the websites of one or more online operating institutions for addiction care, of one or more online operating institutions for anonymous help with gambling addiction, of one or more physically operating institutions for addiction care and of one or more physically operating institutions for anonymous help with gambling addiction;



Does the gaming operatorprovide information about what exactly constitutes responsible gaming behavior?

## Decree WRV Par 2 Art 8 d

The holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade or to organize remote gaming shall provide consumers with appropriate, clear and comprehensible information on at least the following topics: d.responsible play behavior;



Does the gaming operatorprovide information about measures against addiction?

#### Decree WRV Par 2 Art 8 e

e.the addiction prevention policy implemented by him;

7.1 Self test

#### Decree WRV Par 2 Art 8 para 2 b

Section 8 Decree on the recruitment, advertising and addiction prevention of games of chance

2: The licensee shall also provide clear and understandable access to:

b: a facility by which the player can easily gain insight into his playing behavior;

#### 7.2 Monitoring play behavior

#### Decree WRV Par 2 Art 8 f

Section 8 Decree on the recruitment, advertising and addiction prevention of games of chance

1: The holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade or to organize remote gaming shall provide consumers with appropriate, clear and comprehensible information on at least the following topics:

f: the recording and analysis of playing behavior and the policy pursued by it regarding the processing of personal data and the protection of player privacy;



Does the gaming operatorprovide information about what gaming addiction is and its possible negative consequences?

## Decree WRV Par 2 Art 8 c

c.the risks of gambling addiction associated with participation in the games of chance organized by him;



Does the gaming operatoroffer options to set limits when creating a new account, such as:

- 9.1 Time limits
- 9.2 Deposit limits
- 9.4 Balance limit / automatic payout

#### Koa Article 4.14 & Act Article 31k Gaming Act

By definition, Article 4.14 of the Remote Gaming Decree makes the following components mandatory:

Time limit (4.14.(2)(a);

Landfill limit (subd. b);

Balance limit (subd. c).

Wok 31K1: The holder of a license to organize remote games of chance does not offer remote games of chance to a person who is not registered and notified with him as a player. c. that person has indicated the limits of his playing behavior.

#### Article 4.14

1.The licensee shall register a person as a player only after that person has indicated the limits of his playing behavior.

2.The limits referred to in paragraph 1 shall in any case relate to:

a.the maximum duration of access to the player interface per day, week or month;

b.the maximum deposits into the gaming account per day, week or month, and

c.the maximum balance in the gaming account.

3.The licensee shall take appropriate measures to ensure that the player can change the limits referred to in paragraph 1 at any time, provided that:

a.a reduction in one or more caps takes effect immediately, and

b.an increase in one or more ceilings does not take effect until after at least one week.

4.The licensee shall take appropriate measures to ensure that the limits referred to in subsection 2 cannot be exceeded.

10, 13, 14:

Does the gaming operatorindicate that various aspects of gaming behavior are tracked, what behavior is tracked and stored.

Section 8 Gaming Recruitment, Advertising and Addiction Prevention Decree paragraph 1 The holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade or to organize remote gaming shall provide consumers with appropriate, clear and comprehensible information on at least the following topics:

Sub f: the recording and analysis of gaming behavior and the policies it pursues regarding the processing of personal data and the protection of player privacy..."

We have based the interpretation of the survey on the most common interpretations, so that we can assign scores as specifically as possible. A very important yardstick is article 3.1.12 of the Policy Rules on responsible gaming, where under paragraph 5 various aspects of gaming behavior are mentioned.

In monitoring and enforcing the duty of care referred to in Article 4a of the Act and related laws and regulations, the board of directors may in any case include as a signal that the player:

a.can no longer bear the financial consequences of his gaming behavior;

b.excessively tries to recoup his losses;

c.urgently or repeatedly complains about not winning or not winning enough;

d.urgently or repeatedly requests bonuses;

e.uses a credit card or e-wallet to make a deposit into the gaming account;

f.uses multiple payment methods for a deposit to the gaming account;

g.participates at times unusual for the player, paying particular attention to participation at night (from 00:00 to 06:00);

h.participates for more than six hours in total within a twenty-four hour period;

i.participating significantly more often than other players at the licensee;

j.exhibits gaming behavior that causes negative personal, social or societal consequences;

k.denies, avoids or ignores negative personal, social or societal consequences of his gaming behavior; or

l.attempts to conceal a signal or evade or circumvent an intervention measure.

Article 17 of the Regulation on the Recruitment, Advertising and Addiction Prevention of Gambling additionally provides further clarity in this regard.

a.high or increasing frequency of play;

b.long or increasing playing time;

c. Socially inappropriate treatment of or expressions toward individuals;

d.bets or betting behavior that show a different pattern from bets already made by the player or betting behavior already exhibited by the player;

e.expressions of frustration or discomfort;

f.deviations in the pattern of playing times;

g.setting or having set a high deposit limit.

Provides the gaming operator with information about temporary timeouts and Cruks

#### VRA decision art 8 h

"Section 8 Gaming Recruitment, Advertising and Addiction Prevention Decree

The holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade or to organize remote gaming shall provide consumers with appropriate, clear and comprehensible information on at least the following topics:

Paragraph h: the possibilities for the player to exclude himself from participating in the games of chance organized by that licensee;

Temporary time outs:

Article 4.19

Paragraph 1.Unless a statutory provision provides otherwise, the licensee shall in any case suspend the opportunity to participate in the licensed games of chance:

a.at the player's request;

"h.the possibilities for the player to exclude himself from participating in the games of chance organized by that licensee.

i.the possibilities for the player to exclude himself from participating in games of chance, organized in amusement arcades, in gaming casinos and at a distance, by registration in the register;"

#### Koa art 4.19

1.Unless a statutory provision provides otherwise, the licensee shall in any case suspend the opportunity to participate in the licensed games of chance:

a.at the request of the player;"



Does the gaming operatoroffer referrals for exclusionary options through the Cruks?

#### Gaming Act art 33h

WRV decision art 8 paragraph 2 c and d

The board of directors, referred to in Article 33a, shall keep a register of persons who are temporarily excluded from participating in games of chance organized in an establishment as referred to in Article 30c, first paragraph, under b, in a gaming casino as referred to in Article 27g, second paragraph, and at a distance as referred to in Article 31, first paragraph.

section 2, article 8 paragraph 2 c & d

2 The licensee shall also provide access in a clear and understandable manner to: c.a provision that allows the player to exclude himself from participating in the games of chance organized by that licensee;

d.a provision by which the player can exclude himself from participation in games of chance, organized in amusement arcades, in gaming casinos and at a distance, by registration in the register;



Does the gaming operatorindicate in an appropriate, clear and understandable manner the circumstances under which intervention measures will be taken?

### Wok art 27ja paragraph 1 jo. paragraph 4

1 Without prejudice to the provisions of or pursuant to Article 4a, the holder of a license to operate a gaming casino shall record and analyze data regarding the player's gaming behavior in a consistent and unambiguous manner. In doing so, he may process data on the player's health as referred to in Article 4, item 15 of the General Data Protection Regulation to the extent that this is necessary for the prevention of excessive participation in games of chance or gambling addiction.

4 The licensee shall notify the Executive Board referred to in Section 33a if the player referred to in subsection 3 fails to register in the register referred to therein. In doing so, he may use the citizen service number referred to in Section 1(b) of the General Provisions on Citizen Service Number Act.



Does the gaming operatordisclose in an appropriate, clear and understandable manner what intervention measures will be taken?

The Besluit werving, reclame en verslavingspreventie kansspelen (Decree on the recruitment, advertising and prevention of addiction to games of chance) indicates in article 8 (1) (e) that **licensees** to organize remote games of chance must **provide consumers with** appropriate, clear and comprehensible **information about their addiction prevention policy.** 

# <u>Decree on the recruitment, advertising and addiction prevention of gambling gives in Article 8 (1) (e):</u>

"The holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade or to organize remote gaming shall provide consumers with appropriate, clear and comprehensible information on at least the following topics.

- a. The categories of persons to whom gaming may not be offered;
- b. the specifics of the games of chance it organizes;
- c. the risks of gambling addiction associated with participation in the games of chance he organizes;
- d. responsible gaming behavior;
- e. the addiction prevention policy he pursued".

The Regulation of the Decree recruitment, advertising and addiction prevention games of chance (Regulation recruitment, advertising and addiction prevention games of chance) indicates in article 12 sub g that **licensees** to organize remote games of chance shall **in any case indicate in its addiction prevention policy the intervention measures** referred to in article 18 paragraph 1 of the Decree on games of chance a its implementation within the organization.

# Regulation on recruitment, advertising and addiction prevention games of chance article 12 sub q:

"The addiction prevention policy of the holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming arcade, or to organize remote games of chance, shall in any case include a description of the manner in which the implementation of addiction-preventive measures and facilities in its organization as well as the appropriate and effective application of these measures and facilities is ensured. In this description, at least special attention shall be paid to:

- a. cooperation with experts and experts by experience as referred to in <u>Article 7</u>, <u>paragraph 1</u>, <u>of the Decree</u>;
- b. the risk analysis referred to in <u>Article 7, paragraph 2, of the Decree</u>, and in any case:
  - 1. What science-based methods are used for this purpose;
  - 2. How the results of the risk analysis are incorporated into addiction prevention policies;



- c. the basic course and the supplementary course;
- d. the provision of the information referred to in <u>Article 8, paragraph 1, of the</u> Decree:
- e. composition of the information referred to in <u>Article 8, paragraph 1, of the Decree</u>, in accordance with <u>Article 16</u> of these regulations;
- f. the analysis referred to in <u>Articles 27ja</u>, <u>30v</u> and <u>31m of the law</u>, and in any case:
  - 1. In what manner the analysis is performed;
  - 2. What methods and tools are used for this purpose;
  - 3. How it is verified that the results of the analysis are aligned with the gaming behavior exhibited;
  - 4. In what way is provision made for the continued development of the analysis;
- g. the intervention measures referred to in article 18(1) of the Decree;"

Article 18 (1) of the Decree on the recruitment, advertising and addiction prevention of gambling (referred to by Article 12 (g) of the Regulation on the recruitment, advertising and addiction prevention of gambling) indicates that it concerns the intervention measures to prevent excessive participation and addiction to gambling as much as possible.

# <u>Decree on recruitment, advertising and addiction prevention games of chance article 18 (1):</u>

"If the analysis referred to in <u>Article 15</u> indicates excessive participation in games of chance or risks of gambling addiction, the holder of a license to organize a gaming casino, to have one or more gaming machines present in a gaming hall or to organize remote games of chance shall take appropriate intervention measures to prevent excessive participation and gambling addiction as far as possible. The holder of a remote gaming license shall in any case take such measures if the player exceeds a limit as referred to in <u>section 4.14</u>, <u>second paragraph</u>, <u>under a or b</u>, of the Remote Gaming Decree."

**In conclusion** article 8 sub 1 states that remote gaming operators shall provide information to the player in an appropriate, clear and understandable manner regarding their addiction prevention policy. Article 12 sub g of the Regulation on the recruitment, advertising and prevention of addiction to games of chance states that remote gambling operators must include at least the intervention measures in its addiction prevention policy.



Does the gaming operatorprovide an easily accessible record of the player's playing behavior?

#### Section 4.31 Remote Gaming Decree

The licensee shall provide the player with access on each page or screen of the player interface to the necessary data relating to the player's gaming account and gaming account movements. Such data shall include at least:

A. the current balance of the gaming account;

B. the beginning balance of the gaming account at the time of the last application;

C. the total commitment since the last notification;

D. total gains and total losses since the last notification, and

E. a record of all transactions on the gaming account for at least the last 90 days.

Section 9 Recruitment, Advertising and Addiction Prevention of Games of Chance Decree 1: The holder of a remote gaming license shall provide access to the information referred to in Article 8, first paragraph, on the publicly accessible part of the gaming interface and on the player interface, referred to in Article 1.1 of the Remote Gaming Decree. He shall also provide on the initial screen of the player interface the date and time of the players penultimate registration as referred to in section 1.1 of the Remote Games of Chance Decree.

2: The holder of a remote gaming license shall provide the access referred to in Article 8, second paragraph, on each page or screen of the player interface. In doing so, he also provides access to a facility that allows the player to change his player profile, as referred to in Article 1.1 of the Remote Games of Chance Decree.

3: Without prejudice to Article 8, the holder of a license to organize remote gambling shall make it continuously clear to the player on the player interface:

- What time it is in the Netherlands;
- the time elapsed since his last notification, and
- the balance in his gaming account.



Is information about responsible gaming and addiction provided in a neutral environment? (games, betting options and promotions should not be visible)

#### Ksa rules gaming advertising

The information the player receives about the limits of his playing behavior must not contain advertising. Also, the area of the player interface where the player can indicate or change the limits of his playing behavior must not contain advertising.

It was considered when assessing the point that there are no advertising activities, nor references to advertising activities (e.g. link to bonuses and the like). Just used the term "neutral environment" because not only advertising was taken into account but also whether other references to gaming were visible (for example, that gaming is visible in the background), but was more convenient to expand it in terms of explanation.



Is the slogan "What does smoking cost you? Stop in time. 18+ visible on every page?

#### Law Koa Article 4a

3 Careful and balanced recruitment and advertising activities as referred to in the second paragraph shall in any case mean that recruitment and advertising activities are not misleading and that in these activities;

a.at each activity separately, the risks of immoderate participation in games of chance are pointed out by displaying a text to that effect, drawn up in consultation with representative and independent organizations whose aim is to reduce and prevent addiction to games of chance;