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CARNAVAL RESPONSIBLE GAMBLING POLICY

1. INTRODUCTION

Gaming can be a way for people to improve their social and emotional well-being; it has an effect on their professional and personal lives. It is not, however, a way for people to free themselves from economic or emotional issues. The majority of the adult population enjoys gaming in a safe, fun and controlled way, as one of their leisure activities. There is part of this population that struggles with gaming responsibly.

It is fundamentally important for Carnaval to support those struggling with gambling through the promotion of responsible gambling culture by encouraging users to enjoy their gaming activities responsibly.

As a company we are committed to responsible gambling and take our customers and our social responsibility very seriously. Our products are designed for entertainment and enjoyment, and we are committed to providing a secure, fair and socially responsible service. We recognize the fact that our business activities are only sustainable in a healthy and controlled context.

The Company has a firm commitment to society and views people beyond their roles as consumers or clients. In this regard it protects its users, paying close attention to the risks associated with excessive gambling such as addiction or betting excessive amounts.

We believe in a firm but fair approach to responsible gambling. That is why to assist our customers, we offer a range of advice and options to help manage their gaming habits and ensure that everyone who enjoys our service can do so in as safe a way as possible.

Responsible gaming is a serious matter and if a customer feels like gambling is becoming a problem, help is readily accessible. We intend to have a toll-free customer service helpline and our customer service agents will be ready to listen and support our clients.

2. RESPONSIBLE GAMBLING TIPS

We believe that gambling should always be an enjoyable leisure activity. Remembering these simple tips can help make sure our customers gambling does not become a problem.

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- a. Gambling should be entertaining and not seen as a way of making money.
- b. Bet sensibly and never chase losses.
- c. Only gamble what you can afford to lose.
- d. Monitor the amount of time spent playing.
- e. Balance gambling with other activities. If gambling is the only form of entertainment, we encourage our customers to think about whether they are still having fun.
- f. Take regular breaks from gambling. Gambling continuously will cause one to lose track of time and perspective.
- g. Do not gamble when under the influence of alcohol or any substance/circumstance that may impair your judgment or when you are upset or depressed.
- h. Think about how much money you spend gambling. You can track your activity by checking with our support staff.
- i. If you need to talk to someone about a gambling problem, contact our customer care service.

3. UNDERSTANDING YOUR LEVEL OF PLAY

Our customers can be able to take an easy Responsible gaming quiz by clicking on the link below to know about their playing style and to get an idea of how positive their play is.

[https:// gamhelpkenya.com/gambling-addiction-test/gambling-addiction-test](https://gamhelpkenya.com/gambling-addiction-test/gambling-addiction-test)

4. RESPONSIBLE GAMING CULTURE

The company will take the below approaches to promote a responsible gaming culture;

- i. Detecting potential problematic cases in our gaming establishment.
- ii. Information to customers, on the principles of responsible gaming and how they can be applied. For example, in the gaming halls we will advise customers to only gamble the amount of money they can afford.
- iii. Promoting specific prevention plans, designed for every gaming type and environment. These include regulated bets, not offering credit under any circumstance, not admitting minors, self-exclusion programmes, and

serving alcoholic drinks responsibly.

- iv. Active collaboration between the Company and public bodies in promoting prevention and social awareness programmes.
- v. Reinforcing self-exclusion whereby voluntary registration prevents users from accessing the activity. We will endeavor to effect self-exclusion requests within the shortest period business of their receipt, during which period we will undertake due diligence on the account activity and make inquiries with mobile money service providers, the National Police Service, the BCLB, the Ethics and Anti-Corruption Commission, the Financial Reporting Centre and the Unclaimed Financial Assets Authority among other relevant competent government authorities. This due diligence exercise applies to all self-exclusion requests and may delay the turnaround time for effecting such requests. Where we have many requests, for instance during peak seasons such as international football seasons, there may be delays in processing application for self-exclusion and we will encourage customers in any event, to engage the Responsible Gaming options and meet a counsellor to assist in their gambling journey.
- vi. Promoting of therapeutic treatments: Carnaval commits to provide information on where our customers, could seek professional help, support and advice pertaining to gambling problems. We acknowledge that we are not qualified professional advisers on problem or compulsive gambling related matters and accordingly, we are not in a position to offer professional advice of such nature to customers.

Based on the foregoing, we will partner with service providers who provides responsible gambling education in Kenya for example GamHelp, which is one of the leading providers of Responsible Gambling education in Kenya and offers free treatment to problem gamblers across the country. Their specialized services include:

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- The operation of a toll-free hotline (0800-724835).
- A fully equipped treatment and Research Centre for problem gambling. The Centre provides both outpatient and inpatient services for all psychiatric cases, including chronic problem gambling and operates in partnership with several rehabilitation centers across Kenya.
- Fully certified to offer addiction treatment by the Kenya Counselling and Psychological Association (KCPA) and the National Authority for the Campaign Against Alcohol and Drug Abuse (NACADA). NACADA's free helpline service number is 1192 for telephone counseling and referrals.
- Their website, www.gamhelpkenya.org offers a free self-assessment and based on the outcome, if necessitated, directs one of the counsellors to reach out and follow up.

Once self-excluded, a customer will not be allowed to register a new account. Any request for a new account during self-exclusion period in force will be declined.

Where a new account belonging to a self-excluded customer is detected, it will be suspended and closed immediately. Any transaction undertaken within the new account after existing account is self-excluded would be voided, may be considered a Prohibited Act under our General Terms and Conditions and stake returned and you will be notified accordingly.

At the end of the exclusion period requested by the punter, self-exclusion applied will remain in place and continue to be in force for a minimum of seven (7) years, unless the customer takes positive action to gamble again by requesting the exclusion to be removed and/or the account to be re-activated.

The customer **MUST** contact Customer Services by email only after the period has expired in order to re-activate and to regain access to the account and be able to place bets. **Any other requests (other than by email) will not be considered (you will be requested to send a written request after the**

request via telephone has been made).

Carnaval reserves the right to exclude a customer for a longer period at its discretion. This may include instances where Carnaval is informed by legitimate sources (e.g. regulators or other authorities, authorized professional organizations, authorized medical professional etc.) that may warrant extension of a customer's self-exclusion period.

5. THIRD PARTY INFORMATION

We may receive problem gambling related information concerning our customers from third parties from time to time. Such information will be acted upon **ONLY IF** they are received directly from the following legitimate third parties:

- a. Regulators or other similar authorities;
- b. Authorized professional organizations that help and provide support to problem gamblers; or
- c. The customer's authorized medical general practitioner.

Information received from any other third parties will be afforded due consideration, but will not be acted upon in isolation. Activities of a customer who has been reported as problem gambler by such third parties will be monitored to establish if the person displays any signs of gambling problem. Whilst we recognize that information may be provided by such third parties with good intentions and for appropriate reasons, it may not always be the case. Rather than acting solely based on unverified information received, we will undertake appropriate monitoring and assessment of suspected problem gamblers to identify if the reported customer is potentially a problem gambler. We will not, at any point, discuss and/or disclose any aspect of customer's account with such third parties (related or otherwise).

6. PREVENTING UNDERAGE GAMBLING

It is illegal for anyone under the age of 18 to gamble. Carnaval takes its responsibilities to prevent access by persons under the permitted age very seriously. We make it clear in our Terms and Conditions that underage gambling is illegal. We reserve the right to carry out verification checks to ensure that all account holders are at least 18 years old and may suspend



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an account until adequate verification is received.

It is unlawful to allow minors to gamble and we ask our customers to do their part in ensuring that this does not happen. We ask all of our customers, and in fact it is the responsibility of our customers, to ensure that their account is not used for under aged gambling.

7.COMPLAINTS

Carnaval endeavours to make a customer's experience with us an enjoyable one. However, there may be occasions where a customer feels dissatisfied with the quality of our product/s or our customer service. A customer may raise a complaint by sending an e-mail to our Customer Service at the email that will be provided.

We will endeavor to handle complaints as soon as practicable. We request our clients to be patient with our internal processes owing to the number of requests we receive on a daily basis, system upgrades, changes requested by the regulator and new instructions from the customer.

A complaint shall be deemed to have been submitted in a valid manner when it contains clear information regarding the customer's identity and gives all relevant details giving rise to the complaint.