

Africa Optimum Market Structure

Report 2 Responsible Gambling Best Practice

> Prepared by H2 Gambling Capital April 2025

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Executive Summary

This second report prepared by H2 Gambling Capital (H2) on an Optimum Market Structure for the Africa online gambling industry is focused on Resonsible Gambling (RG). RG is arguably the most important consideration for governments and regulators in the industry today, with enhanced player protection an increasingly key concern of licensed operators in a well-regulated market.

The report examines in greater depth why RG is central to future industry regulation in Africa, how it can help to minimise the illegal offshore market, and looks at some of the best practice currently active in the industry today.

As in our first report in the series, only some, not all, of the recommendations provided herein are also applicable to the Africa landbased gambling industry, which by definition should be treated differently to the online sector by governments and regulatory bodies.

The following headline findings emerged from our work:

About Responsible Gambling

Responsible Gambling (RG) should arguably be the No 1 focus for governments looking to establish a well-regulated online gambling industry in Africa today.

RG refers to a set of initiatives and measures designed to encourage players to gamble in a way that is safe, fair, and enjoyable. It is now an obligation in almost all well-regulated jurisdictions.

> The most common RG initiatives typically include: Player Education and Awareness Self-Exclusion Tools Deposit Limits, Loss Limits and Time Limits Age Verification Problem Gambling Detection Responsible Marketing Responsible Game Design

Third Party Collaboration with Specialist Support Charities, Researchers & NGOs Continuous Improvement and Transparency.

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RG Best Practice Initiatives

Player Education and Awareness is the key start point. Common tools for player education include: Self-Assessment Tests, Educational Content, RG Portals, and Awareness Campaigns.

Self-Exclusion Tools give players a practical, immediate way to take control of their gambling habits by removing temptation and creating space to seek help or recover.

One of the most widely used tools is customer-controlled Playing Limits. The most common are in the level of deposits made, the total sum of losses allowed, and the amount of time played.

Ideally, operators should implement robust Age Verification processes to ensure that only individuals of a legal gambling age can access their services. Particularly within Africa, this should include cross-checking against Know Your Customer (KYC) obligations already required of individuals by mobile money providers

The current most trending RG initiative – though not yet as relevant in emerging markets such as Africa – is the introduction of AI Machine Learning technology to predict and Detect Problem Gambling behaviour in players before it happens.

Operators, particularly online operators with no significant landbased brand presence, need to advertise. A balanced approach to Responsible Marketing is needed however and practices can play a significant role in promoting RG.

Responsible Game Design can also significantly impact player behaviour and the potential for harm. Increasingly operators are looking to prioritise responsible game design principles as a result.

In addition to the partnership between government / regulator and licensed operator, collaboration should also be built with Specialist Third Parties, particularly addiction charities and healthcare expertise wherever possible.

In well-regulated markets, operators should also implement RG Continuous Improvement loops to remain effective and relevant.

RG's Contribution to Player Protection

Responsible Gambling can contribute to enhanced player protection in several ways. Key benefits are: Prevention; Early Intervention; Harm Reduction; Support and Recovery; Safer Gambling Environment; Regulatory Compliance; Industry Sustainability.

In markets without meaningful RG: Offshore operators thrive; Vulnerable players are exploited; The public perceives all gambling as dangerous; and Governments lose tax revenue and control over player welfare.



Section 1 About Responsible Gambling

HEADLINE FINDINGS

Responsible Gambling (RG) should arguably be the No 1 focus for governments looking to establish a well-regulated online gambling industry in Africa today.

RG refers to a set of initiatives and measures designed to encourage players to gamble in a way that is safe, fair, and enjoyable. It is now an obligation in almost all well-regulated jurisdictions.

The 9 most common RG initiatives typically include: Player Education and Awareness Self-Exclusion Tools Deposit Limits, Loss Limits and Time Limits Age Verification Problem Gambling Detection Responsible Marketing Responsible Game Design Third Party Collaboration with Specialist Support Charities, Researchers & NGOs Continuous Improvement and Transparency.

What is Responsible Gambling (RG)?

Responsible Gambling (RG) should arguably be the No 1 focus for governments looking to establish a well-regulated online gambling industry in Africa today, ensuring that player protection remains a priority while at the same time maintaining an ethical and sustainable market.

The most progressive licensed operators are also increasingly recognising the importance of prioritising player protection, not only as a regulatory requirement but as a fundamental aspect of their business model, and as a key concern in ensuring both the integrity of the market and the safety of consumers.

Well-regulated markets now follow a series of best practices to promote RG, prevent problem gambling, and safeguard vulnerable individuals. These best practices are becoming essential for regulatory compliance, player trust, and the long-term sustainability of the industry.



Why RG is Important?

Responsible Gambling refers to a set of initiatives and measures designed to encourage players to gamble in a way that is safe, fair, and enjoyable. It is important for both ethical reasons and regulatory compliance, and is now an obligation in almost all well-regulated jurisdictions.

It is particularly key for protecting players from financial and psychological harm. Player protection measures are designed to prevent addiction, underage gambling, and fraudulent activities, at the same time enhancing trust and promoting long-term business success.

The Impact of Irresponsible Gambling

When responsible gaming principles are not followed, several negative consequences can arise, including:

- Increased problem gambling rates leading to financial distress
- Higher instances of mental health issues, including depression and anxiety
- Underage gambling due to inadequate verification systems
- Negative public perception and regulatory crackdowns.

Benefits to Operators and the Industry

Operators who prioritise RG also tend to benefit in the following ways:

- Enhanced reputation and credibility
- Compliance with regulatory frameworks, avoiding legal penalties
- Increased customer trust and long-term player retention
- Contribution to a safer gambling ecosystem overall.



Regulatory Compliance and Frameworks

Regulatory compliance is the backbone of RG. Governments and regulatory bodies should establish legal frameworks to ensure that operators adhere to established RG standards. Compliance is a guarantee to consumers that gambling companies are operating fairly and responsibly.

Key Regulatory Bodies and Laws

Examples of some of the most comprehensive RG regulatory frameworks currently in operation include:

- UK: UK Gambling Commission (UKGC) enforces strict responsible gambling measures with requirements on self-exclusion, player protection, and mandatory contribution to a National Gambling Helpline.
- Sweden: Spelinspektionen (Swedish Gambling Authority) operates a central selfexclusion system (Spelpaus) that applies across all licensed operators.
- Australia: National Consumer Protection Framework (NCPF) is a coordinated national approach despite gambling regulation being state-based, that requires mandatory pre-commitment tools, such as deposit and loss limits on online platforms, and has introduced a national self-exclusion register (BetStop launched in 2023).
- **Denmark:** Spillemyndigheden (Danish Gambling Authority) requires operators to intervene early based on real-time data, and has a national self-exclusion database (ROFUS) integrated into all gambling platforms.
- Malawi: The Malawi Gaming and Lotteries Authority (MAGLA) introduction of an electronic transaction monitoring system is also a good example in Africa of RG enabling authorities to have real-time oversight over player activity.

9 Key Elements of Effective Frameworks

Across these and other best practice jurisdictions, the 9 most common RG initiatives typically include:

- 1. Player Education and Awareness
- 2. Self-Exclusion Tools
- 3. Deposit Limits, Loss Limits and Time Limits
- 4. Age Verification
- 5. Problem Gambling Detection
- 6. Responsible Marketing
- 7. Responsible Game Design
- 8. Third Party Collaboration with Specialist Support Charities, Researchers & NGOs
- 9. Continuous Improvement and Transparency



Section 2 RG Best Practice Initiatives

HEADLINE FINDINGS

Player Education and Awareness is the key start point. Common tools for player education include: Self-Assessment Tests, Educational Content, RG Portals, and Awareness Campaigns.

Self-Exclusion Tools give players a practical, immediate way to take control of their gambling habits by removing temptation and creating space to seek help or recover.

One of the most widely used tools is customer-controlled Playing Limits. The most common are in the level of deposits made, the total sum of losses allowed, and the amount of time played.

Ideally, operators should implement robust Age Verification processes to ensure that only individuals of a legal gambling age can access their services. Particularly within Africa, this should include cross-checking against Know Your Customer (KYC) obligations already required of individuals by mobile money providers

The current most trending RG initiative – though not yet as relevant in emerging markets such as Africa – is the introduction of AI machine learning technology to predict and detect Problem Gambling Behaviour in players before it happens.

Operators, particularly online operators with no significant landbased brand presence, need to advertise. A balanced approach to Responsible Marketing is needed however and practices can play a significant role in promoting RG.

Responsible Game Design can also significantly impact player behaviour and the potential for harm. Increasingly operators are looking to prioritise responsible game design principles as a result.

In addition to the partnership between government / regulator and licensed operator, collaboration should also be built with Specialist Third Parties, particularly addiction charities and healthcare expertise wherever possible.

In well-regulated markets, operators should also implement RG Continuous Improvement loops to remain effective and relevant.

In this section, we list some of the best RG initiatives currently active within the sector. While some of these are mandated by government and regulators, there is increasing evidence that some of the industry's most responsible licensed operators are also innovating in this space and introducing many of their own new practices in order to attract consumers, better protect them, and stay ahead of their competition. We list examples wherever possible to help illustrate each initiative further.



1. Player Education and Awareness

The key start point is educating players about RG, its practices, and its benefits to consumers. Regulators should mandate licensed operators to invest in awareness campaigns and providing tools to help players make informed decisions, which in turn helps to promote a culture of responsible gaming among players.

Common tools for ensuring player education include:

- Interactive Self-Assessment Tests: Players can assess their gambling behaviour.
- Educational Content: Articles, videos, and workshops about RG.
- **Responsible Gambling Portals**: Dedicated sections on gambling websites with advice and resources.
- Awareness Campaigns: Regular public campaigns on TV / radio and online channels to raise awareness about RG.

TEATER EDUCATION AND AWARENESS - Descritactice Examples	
Australia - Chances Are You're	Simple, hard-hitting language, mandatory use in all wagering ads, part of a national strategy to destigmatise help-seeking.
About to Lose	hational strategy to destignatise help seeking.
Canada - Know the Score (KTS)	Interactive, campus-based roadshows combined with online tools targeted at young adults and college students as a high-risk demographic. Emphasis on informed decision-making rather than prohibition.
Sweden - <i>Play Okay</i>	Campaign to promote Sweden's national self-exclusion system, Spelpaus. Paired with interactive quizzes, responsible play tools, and easy opt-out support. Integrated into licensed operator onboarding.
UK - <i>Take Time to Think</i>	Replaced <i>When the Fun Stops, Stop</i> in 2021 which faced criticism for being too soft, with a more reflective, self-check approach. Embedded in betting shops, websites, and TV ads.

PLAYER EDUCATION AND AWARENESS - Best Practice Examples

2. Self-Exclusion Tools

Regulators should ensure licensed operators deploy a range of tools to detect and mitigate problem gambling behaviour. The most common of these is players can voluntarily exclude themselves from gambling for a set time period.

Once activated, these tools prevent the user from logging in, placing bets, or receiving marketing communications from licensed operators. Self-exclusion can apply to online platforms, landbased venues, or both, depending on the jurisdiction. The goal is to give players a practical, immediate way to take control of their gambling habits by removing temptation and creating space to seek help or recover.



	SELF-EXCLUSION TOOLS - Best Practice Examples
Denmark – ROFUS	Register of Self-Excluded Persons that covers all licensed gambling operators. Requires national ID for access. Users can choose to exclude for 24 hours, 1, 3, or 6 months, or permanently.
Sweden – Spelpau s	Centralised system for all licensed gambling, including both online and landbased venues. Based on Sweden's national ID system, which makes enforcement seamless. Easy to use, with immediate effect – blocks access, marketing, and advertising.
UK – GAMSTOP	Mandatory for all licensed online operators under the UK Gambling Commission. Covers marketing opt-outs and also links with gambling blocks run in partnership with UK banks and financial institutions.
Australia - BetStop	Nationwide, free self-exclusion register for all licensed online betting platforms. Allows users to exclude for periods from 3 months to permanently. Blocks promotional material and operator contact.
Ivory Coast – RG Focused Framework	A good example in Africa where the mandatory exclusion of prohibited or self- excluded individuals from all licensed gambling platforms is currently in place. Operators must close affected accounts, display real-time account balances, provide self-exclusion and deposit / bet limit tools, and issue responsible gambling warnings. Annual reporting to the regulator is also required, credit gambling and player-to- player lending strictly prohibited, and no advertising of loan services allowed on operator websites.

3. Deposit Limits, Loss Limits and Time Limits

Increasingly, many governments and regulators are also considering the introduction of customer-controlled (not mandatory) playing limits as part of their responsible gambling programmes. The most common are in the level of deposits made, the total sum of losses allowed, and the amount of time played.

Deposit limits allow players to set restrictions on the amount of money they can deposit into their gambling accounts over a specified period. They help players manage their gambling budget, prevent impulsive overspending, and encourage them to reflect on their gambling habits and reduce their risk of financial harm. The most common today are:

- Easily accessible within the player's account settings
- Flexible, allowing for daily, weekly, or monthly limits
- Immediately effective upon setting or adjusting
- Difficult to override without a cooling-off period.

Loss limits allow players to set a maximum amount they are willing to lose over a specified period. They help players stay within their predetermined budget, prevent chasing losses, and encourage responsible financial management. Effective loss limit tools should:

- Be easily configurable by players
- Apply across all games and betting activities
- Provide clear notifications when approaching the limit
- Prevent further play once the limit is reached.



Time Limits allow players to set restrictions on the duration of their gambling sessions. They encourage breaks and self-reflection, and help maintain a healthy balance between gambling and other activities. The best have features that:

- Allow players to set session duration limits
- Provide notifications when approaching the set time limit
- Automatically log out players once the limit is reached
- Offer the option to set cool-off periods between sessions
- Provide reality checks, timely alerts on session duration and expenditure.

It is important the above limits are player-controlled and not mandatory as if the latter, and excessive, they can have the effect of driving regular gamblers, particularly high-value players, to the illegal offshore market.

DEPOSIT LIMITS, LOSS LIMITS AND TIME LIMITS - Best Practice Examples	
Sweden – Spelinspektionen	Users must set limits upon registration with any licensed operator. Limits are customisable, and proactive (you must set them to start gambling).
Australia – National Consumer Protection Framework (NCPF)	All licensed operators must offer voluntary deposit and time limits. National coordination on harm minimisation in a decentralised regulatory environment. Strong research-based design and regular evaluation.
Malta – Malta Gaming Authority (MGA)	Licensed operators must offer safer gambling tools, although users are not required to set them.

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4. Age Verification

Preventing underage gambling is a critical aspect of RG. Ideally, regulators should ensure operators implement robust age verification processes to ensure that only individuals of a legal gambling age can access their services. Best practices for age verification include:

- Requiring multiple forms of identification during account creation to check age, but also identity, and whether an individual has self-excluded from gambling
- Utilising third-party verification services to cross-check user information
- Particularly within Africa, cross-checking against Know Your Customer (KYC) obligations already required of individuals by mobile money providers
- Conducting periodic re-verification of existing accounts.

AGE VERIFICATION - Best Practice Examples

	Ade Verified Best Huetlee Examples
UK – UK Gambling Commission	Age verification must be instant and robust, using reliable data sources (e.g., electoral roll, credit agencies). No gambling or marketing access is allowed before full verification. Also provides integration with Know Your Customer (KYC) and GAMSTOP initiatives for additional consumer protection.
Sweden – Spelinspektionen	Gambling accounts must be linked to Sweden's BankID system, which verifies identity and age instantly. BankID is widely used and trusted, making it hard to bypass.
Spain – Directorate General for the Regulation of Gambling (DGOJ)	Operators must verify players' identities in real-time before granting access to online gambling. This involves cross-referencing user details, such as national ID numbers, against government databases. Access is denied if the identity cannot be verified or if the individual is a minor or on the national self-exclusion registry.



5. Problem Gambling Detection

While its technical implementation may be challenging in emerging markets such as Africa – mainly due to existing infrastructure and capacity limitations – the current most trending RG initiative is the introduction of Al machine learning technology to predict and detect problem gambling behaviour in players before it happens. This new technology has been pioneered by many leading global online operators based out of Europe and the US, and is now increasingly being adopted also by some forward-thinking governments and regulators in those markets.

The systems monitor player activity and detect potential signs of harm to allow early intervention and support. These systems typically involve real-time data analytics and machine learning algorithms to predict at-risk players.

Key markers of harm that operators monitor include:

- Increasing frequency and duration of gambling sessions
- Escalating deposit amounts
- Chasing losses
- Attempts to circumvent set limits
- Erratic betting patterns.

When potential problem behaviour is detected, best practice operators typically:

- Initiate personalised interventions
- Provide targeted RG information
- Offer support and resources for seeking help
- Consider temporary account restrictions or exclusions.

PROBLEM GAMBLING DETECTION - Best Practice Examples

UK – UK Gambling Commission	The UKGC mandates that operators implement robust measures to identify and assist problem gamblers, and many of the leading operators now employ Al algorithms to analyse player behaviour as a result.
Spain – Directorate General for the Regulation of Gambling (DGOJ)	Spanish operators have implemented AI systems to analyse player data, identifying behaviours associated with problem gambling. This includes monitoring self-exclusion patterns and frequent in-session monetary deposits to predict and prevent gambling-related harm.
Austria – Ministry of Finance	Austrian operators have collaborated with AI service providers to implement systems that monitor and analyse player behaviour, aiming to detect early signs of problem gambling and facilitate timely intervention.



6. Responsible Marketing

Operators, particularly online operators with no significant landbased brand presence, need to advertise. Approaches to marketing need to be balanced however and practices can play a significant role in promoting RG.

In well-regulated markets, operators must ensure that their advertising and promotional activities do not encourage excessive or irresponsible gambling. Best practices for responsible marketing include:

- Avoiding targeting vulnerable populations, including minors and problem gamblers
- Providing clear information about the risks associated with gambling
- Refraining from misleading claims about winning probabilities
- Including RG messages in all marketing materials
- Implementing strict age verification measures for online advertising
- Social media restrictions on influencer promotions and targeted ads to under-18s and / or individuals below the legal gambling age (note: most African countries set the legal gambling age at either 18 or 21 years old).

Denmark – Spillemyndigheden	Denmark adopts a balanced approach which allows operators to market their services responsibly, contributing to a robust online gambling industry while at the same time safeguarding consumers. Advertisements must not target minors or suggest that gambling can enhance social status or financial success. Operators are required to emphasise that gambling is primarily for entertainment purposes.
Sweden – Spelinspektionen	In Sweden, only licensed operators can advertise, and promotions must not be misleading or target vulnerable groups.
Canada Ontario – Alcohol and Gaming Commission of Ontario (AGCO)	Operators are required at all times to include Responsible Gambling messages in their marketing materials.

RESPONSIBLE MARKETING - Best Practice Examples

7. Responsible Game Design

The design of gambling games can also significantly impact player behaviour and the potential for harm. Increasingly operators are looking to prioritise responsible game design principles as a result, including:

- Providing clear information about game rules and odds
- Implementing mandatory breaks in play to encourage reflection
- Avoiding features that create a false sense of control or skill
- Limiting the use of near-miss events that may encourage continued play
- Providing reality checks and time / money spent notifications during gameplay
- Modifying the pace of play and its potential impact on player behaviour
- Minimising the use of sound and visual effects that may increase excitement.



RESPONSIBLE GAME DESIGN – Best Practice Examples	
UK – UK Gambling Commission	Games must display Return to Player (RTP) rates (e.g. 94-96%), have no autoplay without limits, and build in reality checks every 30 minutes.
Netherlands- Kansspelautoriteit (KSA)	Games are not allowed to have turbo modes, and must have mandatory loss history tracking in place.
Portugal - Serviço de Regulação e Inspeção de Jogos (SRIJ)	Portugal requests a mandatory `time and money tracking dashboard on each game, with forced reality checks every 30 minutes. It also prohibits excessive autoplay in roulette and slots.

RESPONSIBLE GAME DESIGN – Best Practice Examples

8. Third Party Collaboration with Specialist Support Charities, Researchers & NGOs

In addition to the partnership between government / regulator and licensed operator, collaboration should also be built with specialist third parties that can support the industry and its players, particularly addiction charities and healthcare expertise wherever possible.

Offering easy access to support services is crucial for players who may be experiencing gambling-related problems. Ideally operators should offer direct links to helplines and counselling services, and collaborate with treatment providers to facilitate seamless referrals. Effective support measures include:

- 24 / 7 helpline services
- Online chat support with trained counsellors
- Self-help tools and resources
- Information about local support groups and treatment options.

By providing comprehensive access to support, operators demonstrate their commitment to player welfare and contribute to harm reduction in the gambling industry.

Best practice RG operators will also actively collaborate with researchers and nongovernmental organizations (NGOs) specialising in gambling addiction and player protection. This collaboration can take various forms including sharing anonymised data to support academic research, funding support and participating in industry-wide initiatives to promote RG. Benefits of such collaborations include:

- Access to cutting-edge research and best practices
- Independent validation of operator RG measures
- Enhanced credibility and trust among players and regulators
- Continuous improvement of player protection strategies.



THIRD PARTY COLLABORATION WITH SPECIALIST SUPPORT CHARITIES, RESEARCHERS & **NGOS - Best Practice Examples**

Australia	Australia has a Gambling Help Network, which consists of national, state, and local support services, including telephone helplines, counselling services, and self-help tools. Several NGOs and charities provide these services, such as Gambling Help Online and Gamblers Anonymous. Australian National University also houses an industry-leading Gambling Research Unit which leads on studies on gambling behaviour, addiction prevention, and treatment.	
Canada	The Responsible Gambling Council (RGC) based in Toronto is a lead organisation globally that also works on a national level to advocate for RG policies. It collaborates with treatment providers, education and community groups, and research institutions across Canada, to improve the understanding and prevention of gambling-related harm.	
USA	The US houses the National Council on Problem Gambling (NCPG) as the key organisation that collaborates with various states, gambling operators, and research bodies. It runs the Gambling Helpline and partners with local organizations to provide resources for problem gamblers.	

9. Continuous Improvement and Transparency

Finally, Responsible Gambling practices should not be static but should evolve in response to new research, technological advancements, and changing player behaviour. In wellregulated markets, operators implement continuous improvement loops that involve:

- Regular evaluation of existing RG measures .
- Gathering feedback from players, staff, and stakeholders
- Analysing data on the effectiveness of player protection tools
- Staying informed about industry best practices and regulatory changes
- Implementing and testing new RG initiatives

This process of continuous improvement ensures that RG measures remain effective and relevant, and that player protection strategies evolve alongside the industry itself.

- Best Practice Examples		
UK – UK Gambling Commission	The UKGC regularly holds consultations with industry stakeholders, charities, researchers, and the public before making regulatory changes. It publishes all compliance actions, fines and penalties, and lists of licensed operators, plus runs open-access Gambling Participation and Prevalence Surveys.	
New Zealand – Department of Internal Affairs (DIA)	Gambling regulation is guided by ongoing social research and treated under a harm minimisation lens. All gambling operators must disclose financials, gambling revenue, and contributions to harm prevention funds.	
Denmark – Spillemyndigheden	Denmark promotes a 'Safe Gambling Environment' Commitment where the regulator's entire approach is based on continuous risk evaluation. Audits and spot checks of licensed operators are performed routinely, with outcomes disclosed.	





Section 3 RG's Contribution to Player Protection

HEADLINE FINDINGS

Responsible Gambling can contribute to enhanced player protection in several ways. Key benefits are: Prevention; Early Intervention; Harm Reduction; Support and Recovery; Safer Gambling Environment; Regulatory Compliance; Industry Sustainability.

In markets without meaningful RG: Offshore operators thrive; Vulnerable players are exploited; The public perceives all gambling as dangerous; and Governments lose tax revenue and control over player welfare.

The implementation of the Responsible Gambling initiatives outlined in this report can collectively contribute to enhanced player protection in several ways. From our review of best practice in the industry today the key benefits are:

- 1. **Prevention**: By educating players and providing tools for self-regulation, operators help prevent the development of gambling addiction problems.
- 2. **Early Intervention**: Through online monitoring systems and also effective staff training, potential issues can be identified and addressed before they escalate.
- 3. Harm Reduction: Tools like deposit limits and self-exclusion programmes help minimise the negative impacts of gambling for those most at risk.
- 4. **Support and Recovery:** By providing access to support services, operators facilitate help-seeking behaviour and recovery for those experiencing gambling-related harm.
- 5. **Safer Gambling Environment**: Responsible game design and marketing practices create a more transparent and fair gambling ecosystem.
- 6. **Regulatory Compliance**: By adhering to best practices, operators ensure compliance with regulatory requirements and avoid potential penalties.
- 7. Industry Sustainability: RG measures contribute to the long-term sustainability of the gambling industry by maintaining public trust and reducing societal costs associated with problem gambling.

Prioritising RG isn't just a regulatory requirement, but a core value that contributes to building trust with players and ensuring the long-term success of gambling operators. By implementing robust player protection measures, the most progressive licensed operators in the industry find that:



- Players are more likely to trust and remain loyal to their brand
- Regulatory relationships are more positive and collaborative
- Staff morale and engagement improve due to ethical business practices
- Long-term profitability is enhanced through sustainable player relationships which in return secure more tax revenue for the government.

As result, Responsible Gambling is a fundamental component of a well-regulated gambling market – particularly as online regulation develops within Africa. Licensed operators implement robust policies and tools to protect players, ensure compliance, and build trust.

Through regulatory adherence, player education, ethical marketing, and continuous improvement, the industry can maintain a sustainable and ethical gambling environment. By prioritising RG, operators not only comply with legal requirements but also foster long-term customer relationships and contribute to a safer gambling landscape.

In markets without meaningful RG:

- Offshore operators thrive especially if they offer bonuses and unchecked highstakes gambling.
- Vulnerable players are **exploited**.
- The public perceives all gambling as **dangerous** and even legal platforms can suffer from mistrust.
- Governments lose tax revenue and control over player welfare.

In conclusion, Responsible Gambling isn't just a moral obligation – it's a strategic tool to make legal gambling in Africa more attractive, more sustainable, and more defensible. When players feel protected, supported, and respected, they're far less likely to play with illegal operators offshore.

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H2 Credentials

H2 – a sector-specialist analyst company headquartered in the UK – is widely recognised as the leading authority regarding market data and intelligence on the gambling industry. Together, our analysts have been tracking and forecasting the value of the sector since the mid-2000s. We have strong professional credibility and impartiality, and positive track record of delivering reports which stand up to scrutiny from a variety of stakeholders. Our services are regularly used as part of operator / supplier market analysis and also for policy formulation in the sector. Our independent analyses have helped many regulators and also governments in several countries develop both improved regulation and optimum market trading conditions within their jurisdictions.

The intelligence generated by H2's proprietary tracking and forecasting model is easily the most quoted source regarding the sector in published company reports, transaction documentation and buy- and sell-side analysts' notes, as well as in the trade / business media. The H2 core model now covers 175+ jurisdictions in over 100 countries and collates and compiles data via key primary sources that include:

- Actual published primary / secondary market and organisation data
- ✓ Knowledge / assessment of the supply side by product vertical
- ✓ H2's own in-house tracking of activity
- ✓ Ongoing contact with private organisations / investors, including subscriber feedback
- Knowledge / opinion of third parties including providers and other industry analysts.

Market forecasts are based on a number of key secondary drivers including:

- ✓ Maturity of product
- Expected product development
- ✓ GDP / broadband / mobile growth
- ✓ Benchmarked markets
- Incorporating the impact of past and expected legislation.

H2 is partnered with Clarion Gaming and *iGaming Business* in the trade media and the International Betting Integrity Association within sports betting integrity. H2's data is also regularly quoted in much of the leading media outlets worldwide including *Bloomberg, The Economist, Forbes, BBC, Thomson Reuters, The FT, The New York Times* and *ESPN*.

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H2 Terminology

Products

Terminology does vary throughout the industry. We breakdown the gambling market as follows:

Betting	Betting / wagering on the outcome of a sports competition or other event or process; the likelihood of anything occurring or not occurring; or whether anything is or is not true.
Gaming	Covers all real money gaming activity that takes place with a licensed landbased or online casino – including table games (roulette, blackjack etc.), gaming (slot) machines and bingo.
Lotteries	Random number draw games or instant ticket / scratch cards offered by national or society / charity lotteries.
Landbased	Physical gambling activity at licensed premises, including bets over telephone.
Online	Activity that takes place via the internet (i.e. computer, mobile, iTV). May also be termed: interactive, digital, remote, iGambling or iGaming.
Mobile	Any activity using a device with a mobile operating system i.e. smartphone handset or tablet.
Channelling	Percentage of the online market that is via its onshore licensed operators.
CAGR	Compound Annual Growth Rate - the mean annual growth rate over a specified period of time longer than one year.

Illegal, Unlicensed or Offshore

Definitions of illegal, unlicensed or offshore market gambling do vary from jurisdiction to jurisdiction. H2's standard analysis normally categorises gambling spend into three main markets - activity where the operator is licensed onshore in the same jurisdiction as the player is located (aka 'white market'); activity where the operator is licensed offshore in a different market (aka 'grey market'), or activity where the operator is completely unlicensed or illegal (aka 'black market').

Gross Win / GGR

H2 utilises the 'gross win' or 'gross gaming revenue' (GGR) metric (i.e. stakes less prizes, but including any bonuses played) to value the gambling sector. This is due to the fact that across different product verticals, geographies and market channels pay-out rates are all different. Gross win or GGR also provides a much better reflection of operators' top line revenue as opposed to stakes, which can include the same money that has been recycled a number of times in many of the product verticals.