

The Responsible Trading Code of Conduct

This Code sets out nine standards that an Adopting Exchange commits to uphold. It targets gambling-like behavior — a pattern of participation, not a product classification — and extends the CFTC's existing core principles (Core Principle 4 and Core Principle 12) rather than proposing a new regulatory regime.

01 Education and expectations

No one begins trading without understanding the economics: the risk of loss, that these are zero-sum markets after fees, and plain-language explanations of pricing, probability, and maximum loss.

02 Marketing

Prediction markets are presented as serious, risk-bearing financial products. No free-money or risk-free claims, no promotions tied to recent losses, no targeting of youth or users showing signs of harm, and full disclosure of paid partnerships.

03 User interface

Interfaces are designed for deliberate decisions: clear money-at-risk, P&L, and settlement rules; no casino-style celebration, near-miss design, or artificial urgency; and added friction after rapid deposits or large losses.

04 User controls

Deposit, loss, and exposure limits, time reminders, cooling-off, and self-exclusion are easy to find — immediate when tightened, delayed when loosened — with no marketing during a period of exclusion.

05 Incentives

Incentives are opt-in with clear terms and are never triggered by losses. No VIP programs that reward losses or escalating deposits, and no structures that require excessive volume.

06 Contract design

Contracts with very short duration, high repeatability, or casino-like feedback loops receive extra review, and are listed only with documented justification or offsetting protections.

07 Monitoring and intervention

Documented, tiered responses to loss-chasing and escalation patterns — from reminders, up to suspending promotional outreach and proactive contact with the user.

08 Metrics and accountability

Exchanges track responsible-trading metrics, share them with their regulator at a minimum, and obtain

periodic independent attestation.

09 Age and access

Categorical: sports event contracts are restricted to users 21 and older, verified before any deposit or trade, even where federal law would permit 18.

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