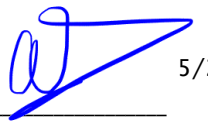
OLISTEK N.V.

POLICY

For Responsible Gambling and Players Protection

1. VERSION CONTROL

Version	Version Date	Approved By
1.0	5/29/2025	The Board

Signed by  5/29/2025

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eMagnus Curacao B.V

Managing Director

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3. PREAMBLE

1.1 Introduction

This Responsible Gaming & Player Protection Policy (hereinafter "Policy") establishes the standards, procedures, and commitments of OLISTEK N.V. (hereinafter "the Company") to maintain a safe, fair, and accountable gaming environment in compliance with Curaçao law—specifically, the National Ordinance on Games of Chance (LOK)—and the Curaçao Gaming Authority (CGA) Responsible Gaming Policy. This Policy is further guided by recognized best practices in the broader international gaming community.

1.2 Purpose

The primary objective of this Policy is to ensure that gaming remains an enjoyable form of entertainment and that vulnerable or at-risk players are protected from gambling-related harm. The Company implements proactive measures to detect problematic behavior, deliver meaningful interventions, and educate players on responsible gaming.

1.3 Commitment to Regulatory Compliance

As a holder of a B2C license from the CGA, the Company adheres to all applicable legal provisions, including those stipulated in the LOK and the mandatory standards set forth in the CGA's Responsible Gaming Policy for licensed operators. The Company is fully committed to the following core responsible gaming principles and requirements:

- **Preventing Underage Gambling:** We maintain strict age verification mechanisms to ensure no person under 18 can register, deposit, or gamble on our websites.
- **Accessible Information and Tools:** Responsible gaming policies, warnings, and tools are prominently displayed and easily accessible on our website (including the homepage, Terms & Conditions, and footer). Players are informed about the resources available to help manage their gambling.
- **Player Self-Assessment:** We provide self-assessment resources that allow players to evaluate their gambling habits and recognize potential risks.
- **Behavior Monitoring:** We empower our frontline staff with tools that enable them to monitor player behavior, allowing for early detection and intervention of problem gambling.
- **Cooling-Off and Self-Exclusion:** We ensure players can easily activate cooling-off periods or self-exclude, with these protective measures taking immediate effect and being rigorously enforced once in place.
- **Financial Limits:** Players can set deposit limits (or other limits such as loss or session duration limits) to control their spending, and the Company enforces these limits to prevent excessive gambling.
- **Employee Training:** We ensure that all employees and relevant third parties, such as customer support staff, receive comprehensive training in responsible gaming practices. This equips them to uphold our Policy and assist players appropriately.
- **Commitment to Ethical Partnerships**: We strive to collaborate with industry professionals and reputable partners who share our commitment to responsible gaming. We provide affiliates and marketing partners with guidance, resources, and best practices to help them align with our responsible gaming standards.
- **Ethical Marketing:** All marketing and advertising activities are conducted in line with responsible gaming principles, which include not targeting minors or self-excluded individuals and ensuring all communications are truthful and do not encourage irresponsible gambling.

Through ongoing oversight and periodic internal reviews, the Company continuously evaluates and enhances its responsible gaming measures. This Policy documents the comprehensive approach that management, staff, and partners must uphold, and it will be updated as needed to remain aligned with evolving regulatory standards and best practices.

4. POLICY OVERVIEW AND SCOPE

The Policy provides a structured approach to responsible gambling and player protection. It unifies operational standards and procedures relevant to all levels of the Company's operations, from game design and customer service to marketing. Our Responsible Gaming initiatives not only aim to comply with the CGA's requirements but also to establish a player-focused environment where gambling is conducted safely and ethically.

2.1 Scope of the Policy

This Policy extends to all individuals and entities associated with the Company's gaming operations. It encompasses the entire organizational structure, ensuring that responsible gaming principles are upheld at every level. This includes directors, officers, employees, and contracted personnel who play a role in shaping and enforcing responsible gaming measures. Additionally, affiliates, marketing partners, social media influencers, and third-party vendors engaged in promoting or facilitating the Company's services are also bound by this Policy. Their commitment to responsible marketing and ethical promotional activities is essential in maintaining a safe gaming environment. Furthermore, the Policy applies across all digital platforms, websites, and applications operated or controlled by the Company, ensuring that responsible gaming safeguards are embedded into every aspect of the online gaming experience.

2.2 Policy Foundation

The foundation of this Policy is rooted in the comprehensive legal and regulatory framework governing responsible gaming in Curaçao, ensuring the highest standards of player protection and fair gaming practices. This Policy has been developed in strict adherence to:

- The LOK (National Ordinance on Games of Chance, Landsverordening op de kansspelen, P.B. 2024, no. 157) – The primary legal instrument in Curaçao regulating games of chance, which establishes operator obligations for responsible gambling, fairness, and consumer protection. This Policy aligns with all LOK provisions and anticipates updates to ensure ongoing compliance.

- The Curaçao Gaming Authority's (CGA) Responsible Gaming Policy – The most recent iteration of this policy, published on 21 February 2025, sets forth mandatory responsible gaming requirements for licensed operators. The Company ensures that all provisions outlined in this regulatory framework, including self-exclusion protocols, deposit limits, behavior tracking mechanisms, and marketing restrictions, are incorporated into daily operations.

- Best Practices from International Responsible Gambling Frameworks – In addition to complying with local regulations, this Policy reflects widely recognized global standards for responsible gaming. The Company has considered principles from regulatory jurisdictions with mature gambling oversight, incorporating evidence-based strategies for harm minimization, player self-regulation tools, and operator accountability mechanisms.

By integrating these legal, regulatory, and best practice guidelines, this Policy not only fulfills the necessary compliance obligations but also reinforces the Company's commitment to fostering a sustainable and responsible gaming environment. Ongoing monitoring and revisions ensure that the Policy remains dynamic and adaptive to emerging responsible gaming trends, technological advancements, and regulatory developments.

5. RESPONSIBLE GAMING FRAMEWORK

The Company is dedicated to fostering a responsible gaming environment that prioritizes player protection, regulatory compliance, and sustainable gambling practices. Our Responsible Gaming Framework is designed to mitigate gambling-related risks while ensuring that gaming remains an enjoyable and safe form of entertainment. Through a combination of technological safeguards, player protection tools, responsible gaming initiatives, and ongoing compliance efforts, we strive to create a well-balanced and ethical gaming experience.

3.1 Technical Safeguards

One of the key components of our framework is the implementation of technical safeguards to prevent underage and problematic gambling. We employ strict age verification measures, requiring players to provide valid identification before being permitted to deposit or play. Additionally, our platform integrates advanced behavior-tracking mechanisms that monitor player activity, identifying irregular patterns that may indicate problematic gambling. By leveraging these tools, we can take proactive steps to intervene when necessary and offer support to those at risk.

3.2 Player Protection Tools

To empower players with greater control over their gaming habits, we provide a variety of responsible gaming tools. Our products features self-exclusion and cooling-off options, allowing players to take voluntary breaks from gambling when needed. Deposit and wager limits enable players to set financial boundaries that align with their personal budgets, ensuring responsible play. Reality checks and session limits serve as additional safeguards, reminding players of their gaming activity and encouraging mindful engagement.

3.3 Information Accessibility & Player Education

A cornerstone of our approach is ensuring that players have ready access to information about responsible gaming and resources for help. The Company maintains a dedicated Responsible Gaming page on its website, which offers guidance on healthy gambling habits, warning signs of problem gambling, and step-by-step information on how to use responsible gaming tools (such as how to set a limit or request a self-exclusion). We also include links and contact information for external support organizations (both international and local) that specialize in gambling addiction, so that players can easily seek professional help if needed. Key responsible gaming messages and reminders are woven throughout our products – for instance, prominent notices on the homepage and footer about the 18+ age restriction and "gamble responsibly" messaging, as well as informational blurbs in player account sections. Educational content, such as self-help guidelines and FAQs about gambling responsibly, is provided to encourage informed and mindful play. We strive to present all such information in the primary languages of the markets we serve, ensuring accessibility and comprehension.

3.4 Responsible Marketing & Advertising

Our commitment to responsible gaming extends to our marketing and advertising practices. We adhere to strict guidelines that prohibit targeting vulnerable individuals, ensuring that all advertisements are transparent and do not encourage excessive gambling. Promotions and bonus offers are communicated responsibly, with clear terms and conditions, and self-excluded players are excluded from direct marketing campaigns to prevent undue influence.

3.5 Compliance & Continuous Improvement

Responsible gaming is an ongoing commitment. The Company has governance structures and processes in place to ensure continuous compliance with regulatory requirements and to foster a culture of ongoing improvement. We have appointed a Responsible Gaming Officer (or designated responsible manager) to oversee the implementation of this Policy and to handle complex cases of at-risk behavior. All relevant staff receive regular training and refreshers on responsible gambling so that awareness remains high and new techniques for player

protection are adopted. The effectiveness of our measures (like the usage of self-exclusion or the efficacy of intervention protocols) is reviewed periodically through internal audits and management reports. We maintain detailed records of all responsible gaming interventions and monitor key metrics (e.g. number of self-exclusions, incidents of underage verification failures) to identify areas for improvement. The Company's management and Board of Directors review these reports at least annually and ensure that any identified gaps are addressed promptly. We also remain alert to updates in laws or CGA guidelines and commit to updating our systems and this Policy as needed to remain fully compliant. In summary, through diligent compliance oversight and a feedback loop for enhancements, we ensure that our Responsible Gaming Framework is not static but continually evolving and strengthening. By embedding this Responsible Gaming Framework into every aspect of operations, the Company demonstrates its dedication to creating a secure, transparent, and enjoyable gaming environment. The following sections of this Policy provide more detailed descriptions of the specific measures and tools that constitute this framework, as well as the procedures for their implementation and enforcement.

6. INFORMATION ACCESSIBILITY AND PLAYER SUPPORT

Ensuring that players have easy access to responsible gaming information and support resources is a key component of our commitment to safe gambling practices. The Company's approach focuses on providing clear, accessible, and actionable information at all points of the player experience, and on offering support services to assist players in making informed decisions about their gaming activities.

4.1 Access to Responsible Gaming Information

The Company is committed to making responsible gaming information readily available through multiple channels on our products. A dedicated Responsible Gaming section shall be accessible:

1) from the website's main page,
2) referenced in the Terms & Conditions,
3) referenced in a page with the account settings for the Responsible gaming features and other pages related to the Responsible gaming functionality.

This section provides comprehensive guidance on recognizing signs of problem gambling, outlines the player protection tools available, and offers direct links to external organizations that can provide help (such as gambling counseling hotlines and support groups).

In addition to this dedicated page, key responsible gaming messages are prominently displayed across the website: for example, the homepage clearly indicates that gambling is restricted to adults (18+ logo), features a brief responsible gaming message (such as "Please Play Responsibly") and links to the full Responsible Gaming Policy, as well as links to independent gambling help resources (like GamCare, Gamblers Anonymous, and GambleAware, as well as any relevant local support services in our target markets). The Terms and Conditions of the site explicitly include our commitments to responsible gaming and reference the tools and options players have for their protection.

To ensure information is understandable and inclusive, responsible gaming content is to be provided in all languages relevant to our player base and targeted markets. For instance, if the Company serves players in multiple countries, the Responsible Gaming page and related notices are to be translated accordingly. We also incorporate responsible gaming reminders into player communications: welcome emails sent to new registrants include a note about our responsible gaming tools, and periodic account notifications may contain tips for staying in control or reminders about setting limits. By integrating responsible gaming information into various touchpoints (website, emails, support communications), we aim to keep players continuously informed about safe gambling practices and the help available.

4.2 Self-Assessment Tools

Self-assessment is an important resource that allows players to privately evaluate their own gambling behavior. On our Responsible Gaming page, the Company provides self-assessment tools, such as questionnaires and checklists, to help players reflect on whether their gambling habits might be problematic. One such tool is the self-assessment test modeled on widely accepted problem gambling screens (for example, a questionnaire similar to the Gamblers Anonymous 20-question test or the CAGE questionnaire adapted for gambling). This test asks players about their behaviors and feelings related to gambling – for instance, whether they have felt the need to cut down, whether others have commented on their gambling, if they feel guilty about their gambling, or if they ever gamble to escape personal issues.

Additionally, the platform allows players to view a detailed history of their transactions and gameplay as described in this Policy further, which can serve as a factual basis for self-assessment. By reviewing their

betting and wagering history, players can better understand their gambling patterns. We encourage players to regularly check their account summaries and consider whether their gambling remains within personal limits. The combination of reflective questionnaires and transparent account data empowers players to make informed decisions about their gambling.

In summary, self-assessment tools are provided to help players identify potential problems early. Players showing signs of gambling-related harm through these self-evaluations are gently prompted to utilize our support measures (deposit limits, cooling-off, self-exclusion) and are directed toward professional help resources when necessary. Our goal is to give players the means to honestly appraise their gambling and take action before a problem develops or worsens.

4.3 Parental Controls and Prevention of Underage Gambling

As part of our responsibility to protect minors, we actively promote the use of parental control tools that help prevent underage individuals from accessing gambling products. We provide links to third-party parental control software, such as Net Nanny and GamBlock, which enable parents to restrict access to gambling websites. Additionally, we encourage parents and guardians to safeguard their login credentials and payment details to ensure that minors do not gain unauthorized access to our products.

Our products also include a clear age restriction policy, requiring all players to verify their identity before they can deposit or engage in real-money gambling activities. Any accounts found to belong to underage individuals are immediately closed, and any deposited funds (except those frozen under AML policies) are refunded to the original payment method. To further strengthen our underage gambling prevention efforts, we conduct periodic audits of our verification processes and collaborate with regulatory authorities to ensure full compliance with age restrictions.

To increase awareness among parents and guardians, we provide educational materials on recognizing signs of underage gambling and the steps they can take to prevent access. Our product also includes visible age restriction warnings and reminders about responsible gaming measures.

4.4 Customer Support for Responsible Gaming

Our trained customer support team is available to assist players with responsible gaming inquiries, provide guidance on setting limits, and offer support for those experiencing gambling-related difficulties. Players can reach out through multiple communication channels, including email, live chat, and phone support.

In addition to offering direct support, our customer service representatives are trained to identify signs of problem gambling and provide appropriate recommendations. If a player demonstrates distress or signs of compulsive gambling, our team may proactively offer self-exclusion options or direct them to external support organizations.

Additionally, we collaborate with recognized gambling support organizations and provide direct links to external resources such as GamCare, GambleAware, and Gamblers Anonymous, ensuring that players have access to professional assistance whenever needed.

Through these initiatives, the Company ensures that players can access the tools and information necessary to maintain a safe and responsible gambling experience. Our commitment to information accessibility, self-assessment tools, and parental controls reinforces our dedication to protecting vulnerable individuals and fostering a gaming environment that prioritizes player well-being.

By continuously refining our responsible gaming efforts and integrating new technologies to enhance player protection, we aim to set industry standards for responsible gambling practices. Our ongoing commitment to transparency, education, and proactive intervention ensures that all players can enjoy a safe and controlled gaming experience.

7. PRODUCT FEATURES AND PLATFORM SETTINGS

The platform used for the Company's products is engineered not only to offer an engaging gaming experience but also to empower players with the tools and controls necessary to maintain responsible gambling. This section sets out in detail the various product features and platform settings designed to promote player self-management, prevent problematic behavior, and ensure regulatory compliance. All the features mentioned below, which are to be set by players, are supposed to be integrated into the product in accordance with industry best practices and regulatory guidelines, however in case some functionality is not accessible from the product right away, those can be requested manually via the support channels either through chat or by email.

5.1 Behavioral Tracking

A cornerstone of our responsible gaming approach is the continuous monitoring of player behavior. The Company employs a behavioral tracking framework that monitors a range of player activities, including—but not limited to—deposit patterns, wagering frequency, session duration, withdrawal reversals, and sudden changes in betting patterns.

Data Collection and Analysis: From the moment a player begins to use our services, our systems collect data on various aspects of their gambling activity. This includes, for example, the frequency and amount of deposits, bet sizes and wagering patterns, the length of gaming sessions, the frequency of wins and losses, and any behaviors such as reversing withdrawal requests or rapidly switching between games. These indicators help us establish a baseline of what constitutes typical play for each individual.

Red Flags Detection: We place a strong emphasis on the experience and judgment of our internal teams—particularly those in customer support and responsible gaming. The value of this human-led approach lies in its nuance and context-awareness. The responsible team closely monitors player activity and assesses deviations from normal patterns. For example, if a player who typically deposits small amounts once a week suddenly begins making large deposits multiple times per day, this is red-flagged for review and possible intervention. In addition to manual monitoring and review, technical tools may be employed to further enhance and automate the monitoring of player behavior.

When high-risk patterns are detected, such ones will be escalated for further review and analysis by the responsible staff. These patterns are based on known markers of harm and are calibrated with guidance from responsible gambling research and CGA recommendations. The reports are monitored on a regular basis and the red flags that indicate problematic behavior if any, are immediately escalated to the Company's Responsible Gaming Team (which can include customer support managers, analysts, and the Responsible Gaming Officer) for further mitigation.

Human Review and Intervention: Upon receiving a reg flag notification, responsible gaming personnel will review the player's account and behavior in detail. This review might include checking the player's age and profile, looking at chat logs or support contact history for any indications of distress, and examining the exact timeline of the concerning behavior. Based on this review, the Company determines whether an intervention is warranted and what type. Interventions are tiered according to severity. Initially, the Company may reach out to the player with a friendly check-in, via email or on-site message, reminding them of the available responsible gaming tools and encouraging healthy play habits. If the behavior indicates higher risk (e.g., signs of potential addiction), a more direct intervention is initiated: trained customer support or responsible gaming specialist will contact the player (via phone or a personal email) to discuss the observations. In this conversation, the staff member will express concern, provide specific feedback on what has been noticed ("We've observed you've been playing for very long sessions without breaks," for example), and strongly encourage the use of specific tools like setting limits or taking a temporary break. The player will also be offered information about professional help.

All such interactions are conducted in a supportive, non-confrontational manner, focusing on the player's well-being. The conversation and any actions the player agrees to (or declines) are documented in the player's account notes for future reference.

Structured Intervention Protocol: The Company has a clear protocol that guides staff on how to escalate interventions if a player does not respond to initial outreach or if their behavior continues to deteriorate. For instance, if a player ignores advice and the risky behavior persists or worsens, the Responsible Gaming Team might take more assertive action. This could include setting certain limits on the account administratively (such as a deposit or play-time cap imposed by the Company) if our terms and regulatory allowances permit it. In extreme cases where the player appears to be in significant trouble and is not heeding advice, the Company reserves the right to enforce a temporary suspension or even an operator-initiated exclusion (see Section 6, Operator-Initiated Exclusion) to prevent further harm. Such decisions are not made lightly and involve management and the Responsible Gaming Officer. The player would be informed of any such action and the reasons for it.

Privacy and Data Protection: All behavioral tracking is done in compliance with privacy laws and data protection standards. Player data used for monitoring is handled confidentially and is used strictly for the purpose of safeguarding the player and fulfilling our legal responsibilities. We inform players (through this Policy and our Privacy Policy) that their gambling activity will be monitored for responsible gaming purposes. Analysis may be done on anonymized data sets for improving our models, but any personal intervention is of course done on an identified basis with due care.

Continuous Improvement of Monitoring: The Company periodically reviews the effectiveness of its behavioral tracking criteria. We analyze red flags detected, refining the system to reduce false positives and ensure we catch true cases of concern. We stay informed about the latest research and tools (including the potential use of artificial intelligence and machine learning) that could enhance our ability to detect problem gambling behavior even earlier or more accurately.

Through robust behavioral tracking, the Company aims to fulfill the requirement set by Article 1.4(e) of the LOK which effectively obliges operators to prevent offering games of chance to persons who can reasonably be assumed to be vulnerable or at risk. In practice, this means our monitoring and intervention framework is a vital safety net: it helps identify vulnerable players and triggers a compassionate intervention process. By doing so, we strive to prevent harm before it escalates, aligning with both regulatory expectations and our own commitment to our players' well-being.

5.2 Age verification and protection of minors

Preventing access to gambling by minors (individuals under the age of 18) is an unequivocal priority for the Company. We have implemented a multi-layered approach to age verification, designed to strictly enforce the 18+ age requirement at all stages of customer interaction, from registration to withdrawals. Below, we outline our measures to verify age, the steps we take if underage gambling is attempted or suspected, and how we ensure our products do not appeal to minors.

The Company does not promote its services to minors and has consequently implemented various prevention methods to ensure that the access of minors to the Company's websites/apps through which gambling services are provided is prohibited.

Age Verification at Registration: During the account registration process, every new player must affirm their age. The interface provides two options for age confirmation: players must either input their date of birth, with an automatic validation ensuring they are 18 or older or select a checkbox confirming they are over 18 years old. If the date of birth entered indicates the individual is under 18, the system will immediately reject the registration and display a message stating that minors are not allowed to gamble. No account can be created without passing this initial verification step.

KYC Identity Confirmation: Age verification does not rely on self-certification alone. The Company's Know Your Customer (KYC) procedures, conducted in line with our AML obligations, play a critical role in confirming the age and identity of our players. All players are required to submit valid identification documents (such as a passport, national ID card, or driver's license) as part of the verification process, especially before being permitted to make a withdrawal and often at an earlier stage in line with AML policy (e.g., upon reaching certain deposit thresholds or if any suspicion arises). These documents are reviewed by our verification team or trusted third-party verification services to ensure authenticity and to confirm that the date of birth indicates an age of 18 or above.

If for any reason the Company has doubts about a player's age or the authenticity of provided information at any point (even before formal KYC triggers are reached), we will proactively initiate age verification immediately. This could include requesting identification documents earlier than usual or using database checks or open-source information to corroborate the player's age.

Secondary Verification Measures: In cases where initial ID checks are inconclusive or if we suspect fraud (for example, if an underage person might be using a parent's documents), the Company employs secondary verification methods. These may include requesting a selfie or live photograph of the player holding their ID (to ensure the person matches the identification), asking for proof of address (which might indicate if the individual is living at a school or other clues to age), or cross-referencing against public records and third-party age verification databases. We also verify payment methods – for instance, if an account is funded by a credit card, we check that the cardholder's name matches the account name, which provides an additional layer of assurance (minors typically do not have credit cards in their own name).

Handling Underage Account Detections: If it is determined that a registered account is being used by an underage individual, the Company takes swift and decisive action in line with regulatory provisions:

- As a first measure, the account is closed permanently.
- Next, except for any funds that must be held due to legal reasons (such as suspicious funds under AML review), all real money deposits made into the account are refunded to the original source of payment. Any winnings that were accrued (if any bets were placed prior to detection) are voided; the minor has no claim to them, as they were never eligible to gamble.
- We then inform the individual via email (and potentially their parent/guardian if appropriate and contactable) that the account has been closed due to an age violation. The communication is clear about the legal age requirement and the actions taken (refund of deposits, forfeiture of winnings).
- We retain the personal information of the individual in our internal systems (in a secure manner) to ensure they cannot simply re-attempt registration with slight variations of details; effectively, they are blacklisted company-wide for being underage.
- We will also report the incident to the CGA as required, including outlining how the underage user was able to register and what measures we are taking to prevent similar occurrences (for instance, if it was due to a previously unknown loophole or if an affiliate referred the minor, etc., we will address those causes).

Staff Training on Age Verification: All relevant personnel, particularly those involved in customer onboarding, customer support, and fraud/verification departments, are thoroughly trained on age verification procedures. They are taught how to examine IDs for authenticity and spot red flags that might indicate an underage user (such as the demeanor on support calls, a high-pitched voice on a verification phone call, or communications that suggest youth). They are also instructed on how to handle situations where the age is in question – for example, politely pausing account activity and requesting additional documents. The staff understand the serious legal and ethical implications of underage gambling and are encouraged to err on the side of caution and escalate any uncertainties. The Company conducts periodic refresher training to update the team on new tools or regulatory changes in age verification.

Technological Improvements: We continuously invest in and improve our technological safeguards to keep minors off our products. As identity verification technology advances, we evaluate solutions such as database cross-checking services, AI-based document validation, and even biometric verification options for future

implementation. Our systems undergo regular testing, and we keep abreast of developments such as national digital ID programs or age verification APIs that could further strengthen our process.

Website Content and Design: In parallel with verification controls, the Company also takes care that the content and design of its products do not inadvertently attract minors. Our games, promotions, and advertising materials are designed with a mature audience in mind. We avoid themes, imagery, or language that are primarily appealing to children or teenagers. For instance, we do not use cartoon characters, child-oriented celebrities, or animations that would be more at home in a children's setting. All game graphics and promotional visuals are vetted by the marketing team under guidance from the compliance team to ensure they are adult-oriented. By doing so, we reduce the risk of attracting the interest of minors in the first place.

Parental Engagement: As described above, we also engage the parents and guardians in this effort by providing them with information and tools to protect their children from accessing gambling sites. By fostering this partnership with the community, we reinforce the barrier between minors and our products.

In summary, the Company's age verification and minor protection protocols are comprehensive and strictly enforced. No gambling opportunity is worth the risk of harm to a minor or the breach of our legal obligations. Through rigorous checks, staff vigilance, and a company-wide culture of "no underage play," we maintain a gambling environment exclusively for responsible adults.

5.3 Cooling Off

A cooling-off functionality provides a short-term, temporary break from gambling that a player can initiate to help manage their gambling activity. Unlike self-exclusion (which is longer-term), cooling-off is designed for players who feel they need a brief pause in play – it may be to regain perspective, deal with temporary financial pressures, or just to ensure they don't gamble impulsively for a while. The Company provides a robust and user-friendly cooling-off mechanism in full compliance with compliance requirements, ensuring it is easily accessible, immediately effective, and honored strictly for its duration.

Availability and Accessibility: Players can activate a cooling-off period at any time. This option is prominently available through the responsible gaming tools in their account settings or can be requested via the support team to make it as quick and barrier-free as possible.

On selecting the cooling-off option, the player is presented with duration choices. In line with regulatory guidance, the Company offers a range of cooling-off durations to suit different needs: typically, options include **24 hours (1 day), 7 days (1 week), 1 month, or 3 months**. These options cover brief pauses up to a few months of break. The player chooses the desired duration and confirms their request. At this stage, we also present a gentle reminder explaining the difference between a cooling-off period and a self-exclusion (e.g., noting that self-exclusion is for longer, more serious breaks and cannot be reversed until it ends, whereas cooling-off is shorter and will lapse automatically).

Immediate Activation: Once the player confirms the cooling-off request, the feature is implemented immediately. The player's account is **instantly locked** with respect to all gambling activities for the chosen period. "Instantly" means there is no pending delay or manual approval needed — the product will not allow any new bets, deposits, or gameplay from that moment until the cooling-off period expires. If the player is in the middle of a gaming session or logged in at the time of activation, they will be logged out or otherwise prevented from continuing to play as soon as the cooling-off is in effect.

The cooling-off can apply to the entire account (all products). We also accommodate players who may wish to apply a cooling-off to specific product verticals only (as allowed by CGA guidelines). For example, a player might choose to take a 1-month break from casino games but still allow themselves to sports bet, or vice versa. Subject to the particular product settings, the system may support selecting one, several, or all gambling categories to which the break applies. If a partial cooling-off is set (restricted to certain types of games), the account will be

configured to block activity only on those selected categories while still permitting play on the others. However, we make it clear to players that a full break (all products) is often the safer approach if they are experiencing any gambling issues.

Effects During Cooling-Off: During the cooling-off period, the affected account is in a restricted state. The player **cannot deposit** funds, place any bets, or enter any games for real money. If the player attempts to do so, they will receive a notification that they are on a cooling-off break and cannot continue until the period ends. They are allowed to log into their account for non-gambling purposes, such as withdrawing their remaining balance or accessing their account history (we do not want to trap their funds or data), but even these actions are monitored. Should the player choose to withdraw any remaining balance during the cooling-off, they may do so; however, they will not be able to cancel that withdrawal (to prevent using it as a loophole to get money back into play).

All **marketing promotions and bonuses** targeted specifically to the player are halted once cooling-off begins. During the cooling-off activation process, players are given the option to opt-out of marketing entirely if they wish. If they do not opt-out, they may still receive general marketing materials that do not encourage gambling activity or suggest bypassing the cooling-off restrictions. Personalized promotions, direct bonus offers, or targeted incentives that could influence gambling behavior during the cooling-off period remain strictly prohibited. Our marketing systems ensure that no materials sent during this period include content that could pressure or entice the player to resume gambling before the cooling-off period expires. The only communications players may receive during this period are general company updates, responsible gaming awareness messages, and non-gambling-related promotional content, as well as service-related notifications (such as withdrawal confirmations or support responses).

Reactivation and Expiry: When the chosen cooling-off period expires, the account is automatically reactivated by the system. Unlike self-exclusion, the cooling-off ends without further action, and the player can immediately use the account again. We do not require the player to contact us to reinstate the account; it is seamless, to respect the difference that cooling-off is a milder form of intervention.

No Discouragement or Interference: The Company strictly prohibits any actions that would discourage a player or challenge their intention to apply a cooling-off restriction to themselves.

Monitoring During Cooling-Off: While a player is on a cooling-off break, our system monitors if there are any attempts to circumvent it (for example, if the player tries to create a new account). We guard against duplicate accounts, and if we detect a cooling-off player attempting to re-register under a different identity, our fraud detection will catch it and block that account as well, escalating it to a potential self-exclusion scenario.

By providing a clearly visible, immediate, and effective cooling-off feature, the Company offers players a valuable tool to control their gambling on their own terms. It serves as an important harm reduction measure, allowing impulsive urges to subside and giving players time to reassess their entertainment in a pressure-free environment. We see cooling-off as an essential component of a balanced responsible gaming program, addressing short-term needs while other tools like self-exclusion address longer-term issues.

5.4. Self-Exclusion

Compared to a cooling-off, self-exclusion is a more extensive and serious measure intended for those who need a long-term break from gambling or who recognize that they are at risk of developing, or have already developed, a gambling problem. The Company's self-exclusion program is designed to be comprehensive, easy to initiate, and strictly enforced, in full alignment with the CGA Responsible Gaming Policy and the LOK requirements.

Definition and Scope: Self-exclusion allows a player to voluntarily ban themselves on a sufficiently longer term compared to cooling off from accessing *all* real-money gambling services on our products for a chosen length of time. Self-exclusion is intended for individuals who feel that gambling has become or could become harmful to them and who need a significant break to regain control. It is often taken as a preventative measure or as a step toward recovery from problem gambling.

The available option of duration of self-exclusion shall meet the regulatory standards. The Company offers at minimum a one-year (12-month) self-exclusion as required by regulation in force. In addition, we provide options for longer terms: commonly 3 years, 5 years, or 10 years. We also offer a **permanent/lifetime self-exclusion** option for those who decide to cease gambling indefinitely. These options are clearly presented to the player at the time they choose to self-exclude. We do not offer any self-exclusion shorter than 1 year via this tool (for shorter breaks, the cooling-off function is appropriate).

Self-exclusion can either be total or, in certain cases, partial by product vertical. By default, a self-exclusion request is applied to all forms of gambling (online slots, live casino, sports betting, poker, etc.). If a player explicitly requests to exclude only from certain verticals (for example, exclude from sports betting but not from poker), we accommodate this, but we also counsel them that a full exclusion might be more effective if they have a gambling issue.

Activation Process: The self-exclusion process is straightforward and **fully self-service** through the product. In the account's Responsible Gaming section or a similarly prominent area, there is an option to "Self-Exclude" with an explanation of what that means. If the player selects this, the system will guide them through a short process: they choose the duration of exclusion from the predefined options, and they must confirm their understanding that during the exclusion they will not be able to gamble and that the decision is irreversible until the period ends. We ensure that the entire process of initiating a self-exclusion online can be completed in one session and typically in just a few minutes. It does not require any back-and-forth or additional steps of approval or confirmation that could deter the player. Once the process is completed the self-exclusion is applied immediately.

We also support alternative channels for self-exclusion. If a player prefers, they can contact our customer support via live chat or email to request self-exclusion. For security, if done by email, we require the email to come from the address registered on the account, and the support team will perform some identity verification (such as asking for some account details) to ensure it's truly the account holder making the request. Once identity is confirmed, the support agent will process the self-exclusion on the player's behalf with the same immediacy. The time it takes on a support channel might depend on the conversation, but our policy is to handle such requests with top priority – meaning an agent will interrupt other tasks to set the exclusion right away during the contact.

Importantly, the player does **not** need approval from the Company to self-exclude. We have removed any unnecessary barriers: there is no need for the player to justify their decision or discuss it with us (though if they wish to talk, we are there to listen and help). The forms and prompts are concise, typically taking well under 15 minutes to complete.

Immediate and Irreversible Action: Once a self-exclusion is set, it takes effect across the product instantly. The player's account status is changed to "Self-Excluded" which triggers a cascade of enforcement actions:

- The account is locked entirely making it impossible for the player to log in. For any non-gaming actions like withdrawing remaining funds or requesting the transaction history, the player must contact the support team who will accommodate the request manually.
- Any **ongoing games or tournaments:** If the player is in the middle of gameplay or has any unsettled bet, we handle those scenarios according to our terms. Usually, outstanding bets are still honored (the outcome will be settled normally and any winnings will be available for withdrawal, but the player cannot use them for new bets). For live tournament games, the player may be treated as having left (forfeiting further participation), etc.
- **Payment methods:** We flag any payment instruments associated with the self-excluded account (credit cards, e-wallets, bank accounts used) so that if someone tries to use the same payment details to set up a new account, it will raise an alert of a possible self-excluded player trying to re-enter, enabling us to block it.
- **Marketing suppression:** The player's details are immediately removed from all marketing databases. They will not receive any promotional or marketing material during the self-exclusion. This extends to affiliates — we instruct our affiliates to cease targeting that player if they have personal marketing info.

Once self-exclusion is active, **the player cannot revoke or shorten it**. This is made clear at the time of opting in. The player must wait until the full term of their selected exclusion has passed. This rule is in place to prevent people from making impulsive self-exclusion decisions and then quickly changing their minds when an urge to gamble returns; it enforces the seriousness of self-exclusion as a commitment to stopping harmful behavior. In rare cases where a player might claim the self-exclusion was a mistake (e.g., they clicked wrong), we have an internal review, but generally, we err on the side of keeping the exclusion, at least for a shorter cooling-off, to ensure protection.

Consequences of Self-Exclusion: During the self-exclusion period, the account remains closed. For any non-gaming activity such as withdrawing any remaining balance or reviewing the transaction history, the player must contact the support team that will facilitate the request manually. If a player has funds in their account at the time of self-exclusion, they are encouraged to withdraw them. The Company will attempt to refund any remaining account balance back to the player's deposit method within a short period (typically within two business days), as long as doing so doesn't conflict with any AML hold or other legal investigation.

All bonus funds or promotional offers in the account are forfeited at self-exclusion (since these cannot be converted to cash except by gambling, which is now disallowed).

While self-excluded, the player will not be able to open any new account with the Company. Our systems will reject attempts to register a new account with the same personal details (name, address, email, device fingerprint, etc. — we use a combination of these to catch matches). If a self-excluded individual manages to create a second account by slightly altering details, as soon as it is discovered (and we do various audits to find such cases), that account will be closed too, any deposits will be returned and winnings forfeited, just as if it were the original account (this is also to dissuade trying to cheat the system). We maintain a **Self-Exclusion Register** internally where all self-excluded persons are listed along with relevant identifying details. This register is kept confidential and secure, and entries are maintained for at least seven years after the end of the exclusion period, per regulatory guidelines, to ensure that even former exclusions are known for historical checks.

Encouraging Self-Exclusion and Communication: We ensure that information about how to self-exclude is clearly communicated on the website. The Responsible Gaming page outlines the steps and emphasizes that players should not hesitate to use this tool if they need it. Customer support agents are instructed that if a player ever indicates a desire to stop gambling or shows serious signs of addiction, offering the self-exclusion option and explaining it is a priority. It is strictly prohibited for the customer support team to discourage or delay the decision of the player to self-exclude themselves, as well as try to re-confirm the decision or consider alternative features.

Reactivation and Post-Exclusion Protocol: Once a self-exclusion period has fully elapsed, the default stance of the Company is *not* to automatically reactivate the player's ability to gamble without interaction. We require the player to take positive action to come back. Specifically, after the exclusion period, the player must contact us to reopen their account for gambling. When we receive such a request, we have a defined process before reactivation:

1. **Written Confirmation:** We typically request the player to provide a written or recorded confirmation (this could be as simple as an email from their registered address or filling out a short reactivation form) stating that they wish to resume gambling and that they understand the risks and will continue to use responsible gaming tools as needed. This step is to ensure there is a deliberate intention and not just a spur-of-the-moment action.
2. **Review of Account and Discussion:** A member of the Responsible Gaming Team or a trained support agent will review the player's prior gambling history and the circumstances of their self-exclusion. If the exclusion was triggered by explicit problem gambling signs, we might reach out to the player for a brief conversation about their decision to return. We approach this conversation in a supportive way: the aim is to gauge if the player feels in control and to remind them of tools to help them stay in control. It's not to judge or block them unless we have a strong reason but to reinforce that we care about their well-being.

3. **Self-Assessment Encouragement:** Upon reactivation, we encourage the returning player to take a self-assessment test (like the Gamblers Anonymous 20 questions or a similar survey) or at least to read through our responsible gambling tips again. We may require them to re-read the Responsible Gaming Policy or acknowledge it once more as a condition of returning.
4. **Safeguards on Account:** We often suggest or even require certain safety measures initially. For example, we might set conservative default deposit or loss limits on the account or ask the player if they want to set such limits themselves immediately. The idea is to ease back into play gently rather than with full unlimited access from the get-go.
5. **Management Approval:** The final reactivation typically is approved by a supervisor or the Responsible Gaming Officer. Only after all these steps are satisfactorily completed will the account be unlocked for normal play.

Operator-Initiated Exclusion: In extreme scenarios, the Company itself can initiate an exclusion on behalf of a player (even if the player has not directly requested it) – for example, if we have clear evidence of severe gambling-related harm or if a player is engaging in fraudulent or criminal behavior. This is considered a last-resort responsible gambling intervention or a security measure. We document such cases thoroughly and keep records in accordance with the current Policy. Operator-initiated exclusions are treated with the same rigor of enforcement as self-exclusions. The affected individual is informed of the decision and the reasons, and it is explained to them under what conditions, if any, they may appeal or return in the future. Typically, if done for responsible gambling reasons, we would not consider reactivation until a certain period has passed and we have reliable assurance of improved circumstances.

Record-Keeping: As mentioned, all self-exclusions are logged in a register and kept for a minimum of seven years beyond their expiry, except those records that have longer duration i.e. 10 years and lifetime exemptions. This log may be reviewed by the regulator, and we are prepared to provide it to the CGA upon request to demonstrate compliance. Each entry includes details like the date of exclusion, duration, method (self or operator initiated), and any notes (e.g. if it was recommended by support, or linked to a particular incident). We also keep records of any communications around it and the eventual lifting/reactivation if it happened.

Communication and Coordination: If the CGA or any centralized self-exclusion system (should one exist or be implemented in the jurisdiction) requires us to report self-excluded players into a central database (for example, some countries have multi-operator self-exclusion registers), we will comply so that the player is also blocked from other licensees as necessary. We also encourage the player to consider self-excluding from other gambling operators or venues they use, since our exclusion only covers our products. We provide information on how to do so (for instance, referencing national self-exclusion schemes if available).

By offering a clear and enforceable self-exclusion program, the Company provides players with a critical tool for protecting themselves when needed. This tool is backed by strong internal processes and a company philosophy that genuinely respects a player's decision to step away from gambling for the sake of their well-being. We treat self-exclusion not as a loss of a customer, but as a success if it helps that individual avoid harm — aligning our perspective with the ethos of responsible gaming that the CGA and the global community advocate.

5.5. Financial and Transaction History

Transparency in financial transactions is a key element of responsible gaming and player empowerment. The Company provides every player with convenient access to their full transaction and betting history. By allowing players to review their own gambling expenditures in detail, we help them stay informed about their activity, which can encourage more conscious and controlled play. It also supports self-auditing and self-assessment efforts by giving factual data about wins, losses, and time spent.

Account Dashboard: Each player has an account dashboard or statement section on our products where they can view a summary of their financial and gameplay activities. The interface is user-friendly and updated in real time with the latest account information. From this dashboard, a player can see their current balance, any active bonuses, and importantly, navigate to historical records such as past deposits, withdrawals, bets placed, and results.

Transaction History Details: In the transaction history section, players can view a chronological list of all monetary transactions on their account. This includes every deposit made (with date, amount, and payment method), every withdrawal (with date, amount, and destination method), and any adjustments (such as refunds, reversals, or administrative corrections, which are all explained in the notes). We also list each bet or wager, including the date and time, the game or event, the stake amount, and the outcome (win or loss, with the amount won if applicable). For casino games, this might be aggregated or shown as session summaries depending on volume, but details are available on request. For sports bets, each bet slip is recorded. Additionally, any bonus credits or promotions that were applied to the account are logged (e.g., if the player received a bonus, used it, and it was cleared or expired, those are noted).

Usage for Self-Monitoring: We explicitly encourage players to review their transaction history regularly. Responsible gambling advice on our site suggests that players keep track of how much time and money they spend, and the account history is there to assist. By seeing an accurate record, a player might realize, for instance, that their losses are bigger than they thought, or that they have deposited more frequently recently. This realization can prompt them to make use of limits or other tools. Essentially, this transparency helps combat the common issue where individuals underestimate or lose track of their gambling expenditures.

Accessibility and Retention: We ensure that players can access a significant period of their history. At a minimum, history from the date of account opening is available on request, and usually, the online interface will show at least the last 3 months by default (with older records provided via support if not accessible directly). In compliance with regulatory and financial record-keeping requirements, the Company retains full transaction records for a number of years (in alignment with both gambling regulations and AML laws, typically 5-7 years). Even if a player closes their account, we keep their records for the required time and can provide them a copy if they formally request it.

We also make it easy for players to get their history. If for some reason the online interface doesn't display all the information (for example, if a player requires an official statement of all transactions), they can contact customer support and we will furnish that information promptly, usually within 48 hours. This might be in a PDF or CSV format. There is no charge for this service.

By maintaining and offering a detailed financial and transaction history, the Company empowers players to make informed decisions. It also adds an element of trust – players can always verify for themselves that outcomes and balances are correct. From a responsible gaming perspective, this tool fosters self-awareness, which is often the first step in recognizing a potential gambling problem or simply maintaining control to ensure the activity remains fun and affordable.

5.6. Deposit and Loss Limits and Other Limitations

One of the most effective ways for players to manage their gambling is by setting financial and time limits on their play. The Company's products include features that allow players to impose personal limits on various aspects of their gambling activity, directly supporting the CGA's mandate that operators provide such tools. These limitations can cover how much money a player deposits or loses, how much they wager, and how long they play in a single session. By giving players these controls, we enable them to pre-define boundaries that align with their individual budgets and risk tolerance, thereby reducing the likelihood of excessive gambling.

Deposit Limits: Players can set daily, weekly, and monthly deposit limits that restrict the total amount of money that can be deposited into their account within a specified period. Importantly, any reduction in the deposit limit takes effect immediately, while any increase is subject to a waiting period—typically 24 hours—to ensure that changes are not made impulsively.

Loss Limits: In addition to deposit limits, players can also set loss limits that cap the amount of money they are willing to lose over a specific timeframe. This functionality helps players manage their risk and avoid chasing losses. Once a loss limit is reached, further gambling activity is temporarily suspended until the limit resets.

Integrated Notifications: When players approach or exceed set limits, the platform automatically generates notifications to players. These notifications serve as reminders to help players manage their spending and may prompt them to review or adjust their responsible gaming settings. This proactive approach ensures that players are continuously aware of their limits and overall financial activity.

Reporting and Compliance: All adjustments to financial limits and related settings are logged and monitored for compliance purposes. This information is periodically reviewed by our responsible gaming team to ensure that the limits in place are effective and that any anomalies are addressed promptly.

5.7. Reality Checks & Session Controls

In addition to other responsible gaming features mentioned above, the Company provides reality check tools and session controls that help players stay aware of their gambling activity in real-time and manage the duration of their play sessions. These features are designed to keep players informed about how long they have been playing and how much they have spent, thereby encouraging periodic reflection and moderation during gameplay.

Reality Check Alerts: The players may enable the feature of periodic on-screen reality check notifications for players engaged in continuous gaming either on a website or by request to a support team. Once enabled, the product will display a pop-up message to the player. This message will clearly indicate how long the player has been active on the site and may include other session information such as the amount wagered or lost during that period. The reality check alert pauses the gameplay and requires the player to acknowledge it by clicking an “OK” or “Continue” button. The player is also given the option at that time to end the session.

This mechanism ensures the player consciously confirms their awareness of the time and money spent before continuing to play. Reality checks serve as important reminders and allow players to step back and make an informed choice about whether to continue or stop playing.

Session Time Limits: To prevent excessively long gambling sessions, players have the ability to set maximum session duration limits. A session time limit means that a player predetermines how long they can be logged in and actively playing before the system will automatically log them out or stop further wagering. For instance, a player might set a 2-hour session limit; once they have been playing for 2 hours continuously, they will receive a notification and be logged out of the gaming session. They would then have to take a break (the session would end) and log in again if they want to continue, effectively enforcing a cooling period between sessions. Session limits help players avoid losing track of time and reduce the risk of marathon gambling sessions that could lead to fatigue or impaired decision-making. If a player does not set a custom session limit, certain default safeguards may be implemented (in line with regulatory best practices) to alert players after prolonged periods of uninterrupted play.

All reality check settings and session limits can be configured in the Responsible Gaming section of the player account or in case the technical feature is not available from the website straight away, this can be requested by contacting the dedicated support team.

By utilizing reality checks and session controls, players can stay mindful of their activity and have built-in reminders to maintain balanced play. These tools complement our financial limits by addressing the time aspect of gambling behavior.

8. MARKETING & ADVERTISING

The Company is committed to conducting marketing and advertising activities in a responsible and ethical manner. As a corporate standard, all marketing practices strictly adhere to applicable laws and industry regulations, ensuring that promotions do not exploit or endanger vulnerable individuals. The Company's marketing and advertising efforts are guided by the following principles:

6.1 No Targeting of Minors or Vulnerable Groups

The Company upholds a strict policy prohibiting the targeting of advertising or promotions towards minors (individuals under 18 years of age), vulnerable groups, or individuals who are self-excluded or identified as problem gamblers. Advertising materials, including imagery, language, and social media content, are designed to avoid appeal to children or adolescents. All advertisements explicitly state that the Company's services are intended for adults aged 18 and above. Furthermore, marketing communications do not target individuals displaying signs of problem gambling or those who have opted out of receiving promotional content.

6.2 Truthful and Non-Misleading Content

All marketing communications are required to be honest, transparent, and free from misleading information. Statements regarding odds, jackpots, or payouts must be factual and not create a false impression of easy financial gain. Terms and conditions related to bonuses and promotions are clearly stated, ensuring that complex or obscure language that could mislead players is avoided.

6.3 No Glamorization or Unrealistic Promises

The Company ensures that gambling is not portrayed as a means to financial success or a solution to financial difficulties. Advertising materials do not suggest that gambling serves as an alternative to employment or a pathway to economic security. Additionally, marketing content does not imply that gambling enhances personal attributes, popularity, or social status. The presentation of gambling is strictly as a form of entertainment rather than a means to resolve personal or financial challenges.

6.4 Avoidance of Exploitative Themes

It is a corporate standard to ensure that promotions do not exploit sensitive emotions or life circumstances. Marketing materials do not suggest that gambling is a solution to loneliness, depression, or stress. High-pressure tactics and the creation of a false sense of urgency (e.g., language such as "Bet now or you'll regret it!") are strictly prohibited. Players should not experience harassment or coercion from the Company's advertising efforts.

6.5 Inclusion of Responsible Gaming Messaging

All major advertising materials and channels prominently display a Responsible Gambling message or disclaimer. For example, website footers, emails, and print advertisements include messages such as "Gamble Responsibly" alongside an age restriction disclaimer (18+). Furthermore, relevant marketing materials provide information on self-exclusion and limit-setting tools, ensuring players are consistently reminded of responsible gaming practices.

6.6 Opt-Out Mechanisms and Respect for Self-Exclusion

The Company enforces a strict policy ensuring that individuals who have self-excluded, entered a cooling-off period, or requested removal from marketing lists do not receive promotional communications. Up-to-date suppression lists are maintained to ensure that excluded individuals are automatically filtered from campaigns. All marketing emails and text messages contain clear and accessible opt-out mechanisms (such as an "unsubscribe" link), and all opt-out requests are honored promptly. The Company does not re-engage individuals who have indicated their desire to refrain from receiving promotions.

6.7 Third-Party Marketing Partners Compliance

The Company requires that all affiliate marketers, advertising partners, and social media influencers adhere to the same responsible marketing standards that it upholds. Clear guidelines are provided to marketing partners outlining permissible and prohibited advertising practices. The Company actively monitors partner campaigns for compliance, and any violations—such as targeting underage audiences or using misleading claims—are addressed with immediate corrective action, which may include termination of the partnership.

By adhering to these responsible marketing standards, the Company ensures that advertising practices remain ethical and do not contribute to problem gambling. The overarching objective is to maintain transparency and engage with players who are capable of making informed decisions. All marketing initiatives undergo review by compliance personnel to ensure alignment with responsible gambling principles. The Company is committed to attracting and retaining customers through fair and enjoyable gaming experiences, rather than through exploitative or high-pressure marketing practices.

9. COMPLIANCE & CONTINUOUS IMPROVEMENT

This Responsible Gambling Policy is developed as an active, evolving framework that the Company commits to regularly assess and improve. We are fully committed to compliance with all regulatory requirements in Curaçao's jurisdiction and to fostering an organizational culture of ongoing enhancement in player protection. The following governance and improvement practices are in place:

7.1 Regulatory Compliance

We comply with the National Ordinance on Games of Chance (LOK) and all directives of the Curaçao Gaming Authority (CGA) related to responsible gaming. This policy incorporates the mandatory standards outlined by the CGA's Responsible Gaming Policy for licensed operators. The Company ensures that every measure described (from age verification to self-exclusion to advertising standards) meets or exceeds the legal requirements. Compliance is monitored continuously, and we prepare required reports or certifications as mandated by the regulator. In the event of updates to laws or regulations, we promptly adapt our policies and procedures to remain in full compliance.

7.2 Responsible Gaming Officer & Management Oversight

The Company's organizational structure provides for a designated Responsible Gaming Officer (or an equivalent role/responsible manager) who is responsible for the implementation and day-to-day oversight of this policy. In the absence of a Responsible Gaming Officer, these functions and responsibilities are assigned to a Compliance Officer as a temporary measure. The Responsible Gaming Officer's duties include monitoring the effectiveness of responsible gambling measures, handling escalated cases of problem gambling, training staff, and serving as a point of contact with regulatory authorities regarding player protection matters. Additionally, our executive management and Board of Directors are actively involved in overseeing our responsible gambling strategy.

7.3 Employee Training and Awareness

Continuous training is provided to all employees who interact with customers or customer data (including customer support, marketing, payments/fraud, and management teams) on responsible gambling practices. New employees receive training on our responsible gambling policy as part of their induction. All staff either recruited or contracted are educated on how to spot potential gambling problems (warning signs) and the correct, empathetic ways to respond or escalate the issue. We conduct refresher training sessions at least annually, and whenever policies are updated, to keep staff knowledge current. Training covers the use of our internal tools as well (for example, how to apply a self-exclusion to an account, or how to handle a conversation with a player showing signs of distress). By ensuring our team is knowledgeable and confident in applying responsible gambling measures, we maintain a strong first line of defense in player protection.

7.4 Internal Controls and Audit

The Company has internal controls in place to ensure this Responsible Gambling Policy is effectively enforced. Our systems are configured to enforce limits, exclusions, and other restrictions automatically wherever possible. We perform periodic internal audits to verify that our procedures (like age verification checks, self-exclusion processing, or marketing list filtering) are working as intended and that no gaps exist. Any incidents or failures are documented and reviewed so that we can improve our processes. We also maintain thorough records of responsible gambling interactions (such as records of self-exclusion requests, copies of customer communications about gambling problems, and log files of any automated interventions). These records are available for review by regulators and form part of our compliance audits.



7.5 Monitoring and Reporting Obligations

We track various statistics related to responsible gambling and report to regulators as required. For example, we compile data on the number of self-exclusions, cooling-off activations, limit-setting usage, and any significant responsible gambling incidents. If the CGA or other relevant authority requires notification of a particular event (such as a player demonstrating gambling-related harm or an operator-initiated exclusion), we comply promptly.

7.6 Continuous Improvement

The Company is committed to continuously reviewing and refining our responsible gambling measures. This policy and its implementation are reviewed at a minimum on an annual basis. We take into account feedback from players (for instance, suggestions or complaints about responsible gaming features), observations from our staff who handle responsible gambling cases, and developments in industry best practices. If more effective strategies or tools become known in the industry, we assess and adopt them as appropriate. Likewise, technological advancements that could enhance player protection (such as new monitoring software, better identity verification, etc.) are regularly evaluated. Our approach is proactive – we do not wait for issues to arise; instead, we actively seek ways to strengthen our safeguards.

7.7 Collaboration and Industry Standards

The Company participates in responsible gambling initiatives and stays aligned with industry standards beyond our immediate jurisdiction. While we tailor our policy to Curaçao's regulatory framework, we also consider the guidelines and codes of conduct from respected international bodies and jurisdictions (e.g., we may look at standards from jurisdictions like the UK or EU for best practices, without explicitly referencing them in our policy). We engage with industry groups, attend seminars/training on responsible gambling, and in general remain open to learning and adopting global best practices that elevate player safety.

7.8 Policy Accessibility and Review

This Responsible Gambling Policy is made available to all employees and is published on our internal knowledge base. For transparency, a summary of our Responsible Gambling commitments is also available to players on our website (typically in the Responsible Gaming section). Internally, the policy document is version-controlled. Updates to the policy are communicated to staff, and significant changes are accompanied by additional training if needed. We foster an environment where staff can provide input or raise concerns about the policy's execution – front-line employees are often best positioned to spot emerging issues or suggest improvements. Management reviews these inputs during policy update cycles.

By enforcing strict compliance and striving for constant improvement, the Company ensures that our Responsible Gambling Policy remains effective and up-to-date. We recognize that as the gambling landscape evolves – through new technologies, new games, and new player behaviors – so must our approaches to player protection. Our commitment is to never be complacent. We treat responsible gambling as a core aspect of our business integrity and success.

7.9 Continuous Commitment

In conclusion, responsible gambling is central to the Company's mission and values. We are dedicated to providing a product where players can enjoy gaming entertainment responsibly, with strong safeguards in place. We will continue to evaluate our policies and innovate our practices to enhance player protection. Through regulatory compliance, staff vigilance, player education, and technological support, the Company aims to maintain the highest standards of integrity, safety, and social responsibility in all our gambling operations. We believe that a sustainable business is one that cares for its customers – and that means ensuring gambling remains a positive, safe experience for everyone involved.

