

V 1.2

GLOBONET B.V.

RESPONSIBLE GAMBLING INTERNAL POLICY

Document / Revision History

Document Reference: GLOBONET B.V. Revision Number: 1.2 Total Pages: 27 Original issue date: 01/07/2024 Revision date: 10.08.2026 Effective Date: _____	RESPONSIBLE GAMBLING INTERNAL POLICY								
<table style="width: 100%; border: none;"> <tr> <td style="width: 20%;">Written by:</td> <td style="width: 50%; border-bottom: 1px solid black;">Anastasiia Rogina</td> <td style="width: 30%;">Date:</td> <td style="border-bottom: 1px solid black;"></td> </tr> <tr> <td>Approved by:</td> <td style="border-bottom: 1px solid black;"> Gouloud Mercedes Hammoud obo Global Related Services B.V. Managing Director GLOBONET B.V. </td> <td>Date:</td> <td style="border-bottom: 1px solid black;">12 August 2026</td> </tr> </table> 		Written by:	Anastasiia Rogina	Date:		Approved by:	Gouloud Mercedes Hammoud obo Global Related Services B.V. Managing Director GLOBONET B.V.	Date:	12 August 2026
Written by:	Anastasiia Rogina	Date:							
Approved by:	Gouloud Mercedes Hammoud obo Global Related Services B.V. Managing Director GLOBONET B.V.	Date:	12 August 2026						

Revision #	Version Date	Description of Changes
1.0	01/07/2024	Initial Draft
1.1	10.12.2025	Popularized paragraph 3.11.1. regarding requirements for self-restraint tools and clause 4.1. regarding the protection of minors.
1.2.	10.08.2026	Added clause 4.3. "Players behaviour tracking, profiling, risk assessment and self-assessment tools" Added Annex 1 "RESPONSIBLE GAMING AND UNDERAGE GAMBLING POLICY" for website use

Contents

1. INTRODUCTION	4
2. IMPORTANCE of RESPONSIBLE GAMBLING ACTIVITY	4
2.1. Background.....	4
2.2. Risk mitigation approaches	4
2.3. Violation of Responsible Gambling Requirements	5
3. RESPONSIBLE GAMBLING ACTIVITY	5
3.1. Departments and activities related to responsible gambling.....	5
3.2. RG requirements to the Management Board.....	5
3.3. RG requirements to the HR Department	6
3.4. RG requirements to the Marketing department, incl. designers.....	6
3.5. RG requirements to the Customer support.....	7
3.6. RG requirements for the procurement process	8
3.7. RG requirements for the Financial Department	9
3.8. RG requirements for the DP Officer and its subordinates.....	9
3.9. RG requirements for the RG Officer and its subordinates	10
3.10. RG requirements to the Legal Department.....	10
3.11. RG requirements for game and website developers and designers	10
3.11.1. Website settings and design requirements	10
3.11.2. Account information	12
3.11.3. RG Awareness	12
4. PROTECTION OF UNDERAGE AND OTHER VULNERABLE PEOPLE	13
4.1. Protection of underage people	13
4.2. Protection of vulnerable people	14
4.3. Players behaviour tracking, profiling, risk assessment and self-assessment tools	14
4.3.1. Behaviour tracking.....	15
4.3.2. Player Profiling and Risk Assessment	15
4.3.3. Identification, Escalation and Record keeping	18
4.3.4. Self-Assessment.....	18
5. AMENDMENTS TO THE POLICY	18
ANNEX 1	20

1. INTRODUCTION

This Policy specifies rules, approaches, and workflows for and regarding employees and independent contractors (hereinafter the “team members”) who work and provide their services for GLOBONET B.V. (hereinafter the “Company”) in respect of the Company’s project operating under a Curacao license.

This Policy is aligned with the Code of Conduct, laws of Curacao, and the Responsible Gaming Policy for Licensed Operators dated April 17, 2025, developed by the Curacao Gaming Authority (the “CGA”).

The owner of the Policy is RGO unless otherwise stipulated in the Policy or the same/upper-level internal document.

Every team member, regardless of their position, must know and comply with this Policy while performing their duties and services. Every team member must keep in mind that their behaviour has a direct impact on players and the Company’s reputation.

If team members find themselves unable to resolve an issue independently or are unsure of whether they correctly understand the requirements of the Policy, they should contact the RGO for advice and clarification.

All team members should read and follow this Policy and related procedures, handbooks etc. If they have any questions, they should ask the RGO.

2. IMPORTANCE of RESPONSIBLE GAMBLING ACTIVITY

2.1. Background

The Company strives to offer its customers safe gambling. However, a small minority indulge in excessive gaming to the point that it starts to negatively affect their physical or mental health, relationships, work performance, finances, etc.

This is what is meant by 'Problem Gambling' - Problem Gambling is a great cause of concern for the Company.

Every team member shall understand his/her role in reducing the risk of harm from problem gambling for the customers and vulnerable groups of people (i.e., underage people, addictive players, etc.).

Responsible gambling is the scope of approaches established in the Company and aimed to minimize risks of problem gambling.

2.2. Risk mitigation approaches

The Company set up approaches to mitigate the risk of the problem gambling, namely:

- Implementing RG policies and culture
- Training team members
- Supporting informed decision making
- Game design and features
- Prevention of gambling by underage persons
- Identifying and assisting potential problem gamblers
- Setting financial limits in play
- Self-exclusion and breaks in play
- Responsible marketing and advertising

2.3. Violation of Responsible Gambling Requirements

Violation of the responsible gaming legislation will affect both the team member and the Company.

Violation by the team member may cause an internal investigation and punishment (i.e., disciplinary sanctions or dismissal).

3. RESPONSIBLE GAMBLING ACTIVITY

3.1. Departments and activities related to responsible gambling

Almost every team member, including senior managers, are involved in responsible gambling activity, namely:

- Management board
- HR department
- Marketing department incl. designers
- Customer support
- Procurements
- Financial Department
- DP Officer and its subordinates
- RG Officer and its subordinates
- Game and website developers and designers.

3.2. RG requirements to the Management Board

Members of the management board shall participate in mandatory trainings and courses on the importance and fundamental concepts of Responsible Gaming and the Company's role to minimize the

risk of Problem Gambling for their customers. They must understand the harms associated with gambling as well as essential prevention and mitigation concepts.

Members of the management board shall understand their impact on other team members behaviour and recognition of the importance to follow RG requirements.

Members of the management board shall encourage team members to develop their knowledge in RG approaches.

Members of the management board shall facilitate the development of or updating RG methods (i.e. policies, software, external trainings, etc).

3.3. RG requirements to the HR Department

Managers of the HR department shall be responsible for awareness of team members, especially newly come, regarding RG policies and procedures, folding relevant test results and certificates.

HR department provides communication between RGO and team members regarding acquaintance with the RG policy and its amended versions, notifications for passing the internal tests, requests for confirmation certificates.

3.4. RG requirements to the Marketing department, incl. designers

Team members involved in marketing and advertising activities shall participate in mandatory training and courses on the importance and fundamental concepts of Responsible Gaming, as well as training on specific RG requirements tailored to their job duties.

Such team members shall make sure the marketing activity and advertisement designs are compliant with the Company's Advertising and Marketing Compliance Policy and the responsible gaming legislation.

Casino gaming advertising and marketing **should:**

- Strictly limit advertising of inducements, bonuses, and credits to existing customers who have specifically opted in to receiving this advertising material;
- Include clear instructions to opt out from receiving further promotional messages;
- Contain a responsible gaming message and/or a toll-free helpline number where practical;
- Include the CGA logo in website footers, as well as all visual media advertising materials;

- Strictly comply with all standards to make no false or misleading claims or create a suggestion that the probabilities of winning or losing at the various games offered by the casino, or by betting on sports contests, are different than those actually experienced;
- Disclose all material conditions and limitations of the offer at its first presentation on the gaming site, with all other conditions and limitations no more than one click away.

Casino gaming advertising and marketing **should not:**

- Contain images, symbols, celebrity/entertainer endorsements, and/or language designed to appeal specifically to children and minors
- Feature anyone who is or appears to be below the legal age to participate in casino gaming activity or imply that underage persons engage in casino gaming
- Encourage extensive gaming and chasing losses
- Contain claims or representations that casino gaming activity will guarantee an individual's social, financial, or personal success
- Promote gaming as an alternative to employment, as a financial investment, or as a requirement for financial security
- Link gaming to seduction, sexual success, or enhanced attractiveness
- Be placed before any audience where most of the audience is ordinarily expected to be below the legal age to participate in casino gaming or sports betting activity
- Imply or suggest any illegal activity

As part of a Company's social responsibility, Marketing department must run problem gambling prevention and responsible gaming campaigns with a goal of achieving a balance between responsible gaming advertising and promotional marketing.

3.5. RG requirements to the Customer support

Team members involved in customer support shall participate in mandatory trainings and courses on the importance and fundamental concepts of Responsible Gaming as well as trainings on specific RG requirements tailored to their job duties. They must understand the harms associated with gambling as well as essential prevention and mitigation concepts.

Customer support team members who interact with players should be able to identify and assist to players who might show signs of gambling-related harm and experience difficulties controlling their play.

Customer support team members should be knowledgeable about the helpline, self-exclusion/timeout, responsible gaming, online gaming blocking software, and local help resources and able to provide that information on request. All information should be in clear and simple language, ideally in multiple languages where necessary.

Customer support team members should be able to advise following help organizations

- Gamblers Anonymous: <https://www.gamblersanonymous.org/>
- GamCare: <https://www.gamcare.org.uk/>
- Gambling Therapy – <https://www.gamblingtherapy.org>
- BetBlocker – <https://betblocker.org>
- Gamban – <https://gamban.com>
- GamBlock – <https://gamblock.com>
- BeGambleAware: <https://www.begambleaware.org/>

3.6. RG requirements for the procurement process

Every team member involved in the gaming software procurement process shall participate in mandatory training and courses on the importance and fundamental concepts of Responsible Gaming, as well as training on specific RG requirements tailored to their job duties.

Such team members shall make sure the software and the supplier are compliant with the Company's Procurements Policy and the responsible gaming legislation.

At a minimum, the games design requirements include:

- Games shall not encourage players to chase their losses, or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they want to stop;
- Auto-play functions must be disabled, and all players should have the means to track the passage of time;
- Features such as turbo, quick spin, and slam stop are not permitted;
- Game play shall be initiated only after the player has placed a wager and activated play. No player shall be forced into game play by selecting the game for review or reviewing information about how the game is played or how bets are made;

- A player should commit to each game individually, releasing and then depressing the 'start button' or taking equivalent action.

3.7. RG requirements for the Financial Department

Every team member involved in processing player's transactions shall participate in mandatory trainings and courses on the importance and fundamental concepts of Responsible Gaming as well as trainings on specific RG requirements tailored to their job duties.

The Financial Department shall provide the further options for self-excluded players:

- Operators shall refund a player's wager if the player enrolls in a self-exclusion program prior to the commencement of an event or series of events on which the outcome of the wager is determined.
- Operators are not required to refund a player's wager if the player enrolls in a self-exclusion program after the commencement of an event or series of events on which the outcome of the wager is determined.

Operators shall cancel all future game transactions for self-excluded player.

3.8. RG requirements for the DP Officer and its subordinates

Every team member involved in personal data protection process shall participate in mandatory trainings and courses on the importance and fundamental concepts of Responsible Gaming as well as trainings on specific RG requirements tailored to their job duties.

As the Company stores player's personal data on its servers located in the EU/EEA, DPO shall provide compliance with the [Standard Contractual Stipulations](#) of the EU Data Commission

As CGA aims to collaborate with operators to find solutions that achieve business objectives while still delivering operations in a socially responsible way that protects players. The Company is expected to share anonymized player data with CGA for the purpose of advancing problem and responsible gambling research.

DPO shall maintains a register of players excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the Company)

3.9. RG requirements for the RG Officer and its subordinates

RGO and its subordinates are obliged to get external trainings regarding RG and develop their knowledge on regular basis.

RGO is responsible for drafting policies and procedure and their implementation.

RGO is responsible for development RG approaches and strategies as well as evaluation of its effectiveness.

RGO shall monitor and eliminate all gaps in team member knowledge of RG.

RGO shall assist team members in resolving their difficulties subject to RG.

RGO is responsible for development of internal RG trainings.

3.10. RG requirements to the Legal Department

Every Legal Department team member shall participate in mandatory trainings and courses on the importance and fundamental concepts of Responsible Gaming as well as trainings on specific RG requirements tailored to their job duties.

Reviewing contracts Legal Department team member shall check them for the compliance with RG and Procurements/ Advertising and marketing compliance Policy requirements.

3.11. RG requirements for game and website developers and designers

Every team member involved in game and website development and design shall participate in mandatory trainings and courses on the importance and fundamental concepts of Responsible Gaming as well as trainings on specific RG requirements tailored to their job duties.

3.11.1. Website settings and design requirements

At a minimum, the website settings and design requirements include:

- the website shall be developed in respect to minimize harmful impact of gaming;
- Free-to-play games available through the gaming site or related websites shall not misrepresent or mislead players as to the likelihood of winning or prize distribution of similar games, and shall have the same odds of winning as games played for money;
- The denomination of each credit shall be clearly displayed on game screens;

- Games shall not encourage players to chase their losses, or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they want to stop;
- Games shall not provide auto-play features for slots;
- Game play shall be initiated only after the player has placed a wager and activated play. No player shall be forced into game play by selecting the game for review or reviewing information about how the game is played or how bets are made;
- A player should commit to each game individually, releasing and then depressing the 'start button' or taking equivalent action. Continued contact with a button, key or screen should not initiate a new game;
- The gaming system must not offer functionality which facilitates playing multiple slots games at the same time. This includes, but is not limited to, split screen or multi-screen functionality.
- Combining multiple slots titles in a way which facilitates simultaneous play is not permitted;
- A player should commit to each game cycle individually, continued contact with a button, key or screen should not initiate a new game cycle;
- Features such as turbo, quick spin and slam stop are not permitted. This is not intended to be an exhaustive list but to illustrate the types of features the requirement is referring to;
- The registration page and pages within the player account must prominently display a Responsible Gaming statement, the online link to CGA, and a link to a page that provides Responsible Gaming material, information, resources, and support for people experiencing problems with gaming;
- Players must be provided an opt-in process whereby they actively consent to receiving any direct advertising and marketing of inducements, bonuses and credits, and must be provided a method to withdraw their consent at any time, where such marketing and advertising materials;
- Two key mechanisms must be made available to players at all times via the Self-restraint section of the website, with the further requirements (at minimum):
 - Cooling Off: A short-term, temporary restriction from gambling activities, which the player can customize:

Duration 24 h, 7 days, 1 month, 3 months;

Vertical options: all or particular products

Brand: all or a specific Company's brand

- Self-Exclusion: A long-term, irrevocable exclusion from all gambling activities under the Company's license, with the further requirements (at minimum):

Duration 1, 3, 5, 10 years or lifetime;

Account is closed. Player can no longer log-in.

- Players must not be guided or influenced toward one option over another. No interference, bonuses, or reassurances may be provided. Players must be clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable. Players must be provided with the tool to set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).

3.11.2. Account information

Account information plays an important role in the self-assessment of a player's gaming habits. Therefore, all player account transactions should be made readily available and clear to the player. Requirements to the available account Information:

- At a minimum, the gaming system should give the player access to the following player account transactions:
- Deposit, withdrawal history, and current balance;
- Date and time of previous login;
- Gaming event and transaction history (game session outcomes and game transactions);
- Customer's net position (i.e., the total of all winnings minus the sum of all losses from the start of the session) for all gaming sessions;
- Method and source of funds used for transactions;
- Total monies wagered for session and/or period of time;
- Total monies won or lost for session and/or period of time;
- Account balance at start and end of session.

3.11.3. RG Awareness

The Company pays attention to players' awareness regarding RG and uses the website as a communication platform.

- Responsible gambling policy is always available at the website footer;
- During registration and in case of amendments the players are notified about RG policy and its updates;

- Players may be subject of test regarding their awareness about RG;
- Self-restraint features are easily accessible;
- Once player initiates a break (cooling-off, self-exclusion), the Website does not allow him to place further wagers during the time period of the break;
- Once the player self-excludes, he/she shall be immediately logged out of his/her account and unable to login in for the duration of their exclusion;
- The Company maintains a register of players excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the Company);
- The Company takes active steps to identify, and if required, remove self-excluded players from the website when they are found to be in breach of their self-exclusion agreement.

4. PROTECTION OF UNDERAGE AND OTHER VULNERABLE PEOPLE

4.1. Protection of underage people

The Company declares zero tolerance for involving underage people in gambling. The Company's software and website are designed to process age verification, and team members are trained to perform age verification.

The Company enables its websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of the site.

Customer support team members are appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age, namely:

- Verifying additional information about the customer, such as carrying out searches of credit reference and other databases that list names and addresses of individuals over the age of 18;
- Carrying out secondary age verification checks in any circumstances that give the operator reason to suspect that the person may be underage;
- Before a player account is created, players shall affirm that all player's information provided upon registration is complete and accurate, including age verification;
- The player is not permitted to access a gambling account or permitted to deposit and gamble until the registration procedure is completed.

Once, despite all taken actions, the Company becomes aware that the player is a minor, their account will be closed immediately, and their deposits will be refunded; their winnings will be forfeited, and the player will be notified about the reason of closing their account.

The Company maintains records of all age verification processes and their outcomes to make them available for regulatory review.

Regardless of the above, proof of age document submission and checks are subject to the CGA's Know Your Customer and AML policies and should at a minimum include a government-issued valid ID check (such as a passport, national ID, or driver's license) on reaching specified thresholds and in any case prior to first withdrawal.

Secondary verification methods, such as electronic verification systems, payment validation, third-party or government database checks, and selfie verification, may be undertaken by the Company's team member at its own discretion, but do not supersede the government-issued document requirement.

4.2. Protection of vulnerable people

The Company acknowledges risks of harm from the Problem Gambling on particular social groups, such as addicted gamblers.

The website design, marketing activity, and customer support team shall serve to identify, prevent, and minimize the risks of Problem Gambling in a timely manner.

The Company implements self-restraint methods such as limits, cooling-off and self-exclusion option, etc. The Company takes action to increase awareness of the players regarding RG via direct notifications, website notifications, and customer support team chat.

The customer support team is able to help players identify signs of addictive gambling behaviour.

The Company develops risk score matrix to evaluate the player's gaming behaviour and takes action regarding high-risk players as described in clause 4.3. below.

4.3. Players behaviour tracking, profiling, risk assessment and self-assessment tools

The Company implements and maintains appropriate mechanisms for monitoring players' gambling behaviour in order to identify indicators of potential gambling-related harm and vulnerable persons at an early stage. Responsible Gaming monitoring, risk classification or intervention shall be used exclusively for player-protection and regulatory-compliance purposes. Under no circumstances shall Responsible

Gaming measures be used as a reason or pretext to prevent or delay the withdrawal of legitimate player funds.

4.3.1. Behaviour tracking

Behaviour tracking shall be performed on a risk-based basis using available player account data, transactional and gaming activity, Responsible Gaming interactions and, where appropriate, technological monitoring tools.

The assessment of a player's behaviour shall be holistic. A single indicator shall not, by itself, normally result in the player being classified as a problem gambler or vulnerable person. The Company considers the nature, frequency, duration and combination of relevant indicators and whether they occur consistently or demonstrate a material change from the player's previous gambling behaviour.

At a minimum, behaviour tracking may take into account the following indicators:

- sudden or unexplained increases in deposit or wagering frequency or changes in gaming-session patterns;
- repeated failed transactions due to insufficient funds;
- repeated cancellation or reversal of withdrawal requests;
- inexplicably extended or increasingly frequent gaming sessions;
- increased or unusual communications with Customer Support or VIP staff, including repeated requests for bonuses accompanied by signs of agitation;
- frequent setting, changing or attempted circumvention of Responsible Gaming limits or repeated use of Cooling-Off;
- available indications that a Player is repeatedly exhausting available payment resources;
- attempts to create or use multiple accounts to circumvent Responsible Gaming restrictions or limits; and
- any other behavioural, transactional or communication indicators reasonably suggesting loss of control over gambling or an increased risk of gambling-related harm.

4.3.2. Player Profiling and Risk Assessment

Based on the data of the player's behaviour tracking, the Company assesses the individual Responsible Gaming risk of each player. The Company's risk score matrix (set out in the Table 1 below) provides for appropriate risk categories and determines the level of monitoring, review and intervention applicable to

the player (set out in the Table 2 below). Player risk assessment shall be reviewed where new relevant indicators arise or there is a material change in the player's gambling behaviour.

Table 1
"Risk Score Matrix"

Risk Indicator	0 – Low / No Indicator	1 – Moderate Indicator	2 – High Indicator
1. Deposit & wagering frequency / escalation	Stable activity consistent with player's established pattern	Noticeable increase in deposits, wagering frequency or stakes	Sudden, significant or repeated unexplained escalation in deposits/wagering
2. Gaming session patterns	Stable and reasonable session pattern	Increasing frequency or duration of sessions	Repeated inexplicably extended sessions, significant escalation or unusually intensive play
3. Failed deposits / insufficient funds	None or isolated technical failure	Repeated failed deposits within a monitoring period	Persistent failed deposits / repeated attempts following insufficient-funds failures
4. Reversed withdrawals	None or isolated cancellation	More than one withdrawal reversal within a short period	Repeated pattern of cancelling withdrawals and returning funds to gambling
5. Communication with Customer Support / VIP	Normal service-related communication	Noticeable increase in contacts or bonus requests	Unreasonably frequent contacts, repeated bonus requests combined with agitation, distress or loss-related statements
6. Use/change of RG tools	No concerning activity; stable voluntary limits	Repeated changes to limits or use of Cooling-Off	Frequent attempts to increase/circumvent limits, repeated Cooling-Off periods or other pattern suggesting loss of control
7. Financial-resource indicators	No indication of financial stress	Emerging indicators suggesting available gambling funds may be exhausted	Strong/repeated indication that Player is exhausting available payment resources or gambling beyond available means
8. Multiple-account / restriction circumvention	No indication	Suspicious attempt requiring investigation	Confirmed attempt to open/use additional accounts to circumvent RG limits or restrictions
9. Self-assessment result	CAGE: 0 Yes	CAGE: 1 Yes	CAGE: 2+ Yes
10. Direct behavioural / vulnerability indicators	No concern identified	Statements or behaviour suggesting possible difficulty controlling gambling	Player expressly states loss of control/problem gambling or other strong evidence of gambling-related harm

The rolling monitoring period is every 3 calendar months started from the 1st of April 2026. Behavioural indicators may be identified by Customer Support, VIP managers and other appropriately trained team members through direct player interactions. The Company may additionally use gaming-platform functionality, automated monitoring, in-game tools, artificial intelligence, machine learning or other appropriate technological solutions to support behaviour tracking and risk assessment.

Table 2
“Risk Score Interpretation”

Score Risk Level	Interpretation	Required Action
0–4	LOW	No material pattern of gambling-related harm identified. Routine automated monitoring; maintain access to RG information and self-assessment tools
5–9	MODERATE	Emerging or combined indicators of potential gambling-related harm. Enhanced monitoring; manual review of profile; RG interaction where appropriate; inform player about Deposit Limits, Cooling-Off and Self-Exclusion; document assessment/action in PAM
10–20	HIGH	Multiple, persistent or significant indicators suggesting material risk of gambling-related harm. Immediate RG review/intervention; direct player interaction where appropriate; consider mandatory Deposit Limit and/or temporary suspension pending assessment; operator-initiated exclusion where severe/persistent risk indicates a vulnerable person

A Player may be classified as **High Risk irrespective of the numerical score** where a single indicator provides sufficiently strong evidence of actual or imminent gambling-related harm. Also, the 3 override rules must be applied when assessing the player’s risk profile:

- **Self-Identification Override.** A player who expressly identifies themselves as having a gambling problem, being unable to control their gambling, or otherwise being vulnerable must be immediately escalated for Responsible Gaming review and must not remain Low Risk solely because of the numerical score.
- **Circumvention Override.** Confirmed attempts to bypass RG limits, Cooling-Off/Self-Exclusion or other RG restrictions through multiple accounts should trigger High Risk review, regardless of the aggregate score.
- **Trend Override.** Rapid deterioration or escalation across several indicators should permit escalation from Low → Moderate or Moderate → High even where the formal numerical threshold has not yet been reached.

4.3.3. Identification, Escalation and Record keeping

Where a team member or monitoring system identifies indicators of potential gambling-related harm, the relevant case shall be flagged in accordance with the Company's internal escalation procedure and, where appropriate, referred to the RGO for further assessment. The RGO or other appropriately authorised team member shall assess the available indicators, the player's profile and previous Responsible Gaming interactions and determine whether intervention is required.

All material Responsible Gaming interactions, whether initiated by the player or the Company, shall be appropriately recorded in the Player Account Management (PAM) system together with identified indicators of concern, the assessment performed and any actions taken.

Where a player is identified as exhibiting at-risk behaviour, the Company applies an intervention proportionate to the assessed level of risk. Depending on the circumstances, measures may include:

- providing the player with information regarding Responsible Gaming and available support resources;
- directing the player to available Responsible Gaming tools, including deposit limits, Cooling-Off and Self-Exclusion;
- direct interaction with the player for the purpose of assessing identified concerns;
- application of mandatory deposit limits where appropriate;
- temporary suspension of the player account pending further Responsible Gaming assessment; or
- Company-initiated exclusion where the identified risk is severe, persistent or otherwise indicates that the player should reasonably be treated as a vulnerable person.

4.3.4. Self-Assessment

The Company provides players with access to self-assessment tools designed to assist them in evaluating whether their gambling remains within healthy limits and identifying potential signs of problem gambling. Players who identify potentially problematic behaviour through self-assessment shall be encouraged to use the Responsible Gaming tools available to them and, where appropriate, seek external professional support.

5. AMENDMENTS TO THE POLICY

The Company may review and amend this Policy from time to time, but not less than once per year.

The Company undertakes to notify the team members about changes that have been made, and the team members are obliged to review the amended Policy.

Any amendment, addition, and/or change to the Policy shall take effect from the moment the updated Policy is published for internal use.

The Company is open to feedback and advice from our team members regarding optimization and enhancing our Responsible Gambling Internal Policy and procedures.

RESPONSIBLE GAMING AND UNDERAGE GAMBLING POLICY

1. GENERAL

This Policy is aimed to help Players to avoid negative impact from gaming and help to defend from the harm of problem gaming.

Gambling at an online casino should always be aimed at entertainment. However, there is a certain percentage of people who lose control over themselves while gambling. Before starting to play, it is important to realise that gambling shall never be viewed as a source of income or debts recovery. It is useful to keep track of the time and the amount of money spent at an online casino daily.

The online-casino www.playfortuna.com / www.booi.com / www.jozz.com (hereinafter referred to as the "Casino", "We") strives to create for You the most comfortable gaming platform for an exciting pastime, but we understand that for some people gambling online could become a problem. Like in all areas of human activity, in the online casino you should know where to stop.

We offer various types of services to assist the Player in case of discovery of game dependency. While Playing games of chance, You shall understand that You are under a risk of losing money and winning is a matter of chance. The Casino has adopted number of measures that will allow You to play games in a responsible manner.

The Player can contact the Casino regarding any responsible gaming concerns via email [\[URLsupport\]](mailto:URLsupport) or LiveChat.

2. RESPONSIBLE GAMING FOR PLAYERS

2.1. Self-Assessment

Wonder if you are gambling too much? Let's check whether You are a ludoman or not!

**Ludoman – means a gambling addicted person.*

Below we present several statements that will help to determine whether You have problems with gambling. If You find that 3-4 of these statements are true for your game in online casinos or for your friend's game, we recommend seeking out professional help from specialists:

- Finding it difficult to control, stop, or cut down on gambling, or feeling irritable when trying to do so

- In the extreme - borrowing money, selling things, and considering fraudulent activities to get money
- Needing to gamble with more money or for more time in order to get the same level of excitement
- Neglecting personal needs (e.g. for food, sleep, hygiene)
- Gambling more in order to win back losses or get out of financial trouble
- Thinking that gambling will get under control as soon as there's a 'big win'
- Lying to cover gambling and refusing to discuss it openly
- Increased debt, unpaid bills, hiding bills, past due notices, winnings, or losses from others
- Neglecting family, work or household responsibilities
- Constantly talking about gambling
- Spending more time and/or money on gambling than he or she can afford
- Experiencing extreme highs when winning and extreme lows when losing
- Having arguments with friends or family about money and gambling
- Skipping family or social functions to play online.

2.2. Problem gaming identification

You see some problems, but You are still able to manage it by yourself? Ok! We give You some useful tips.

The main thing is always balanced decisions about how much money You can spend. You are not threatened by gambling addiction if Your actions are under control. You need to take the issue of preventing ludomania seriously, having decided on a clear sequence of actions:

- **Play for a limited amount of time.** Define for yourself the time You spend on games. If you have problems with this, set a timer or alarm for a specific time when you want to end up a gaming session before starting the game.
- **Manage the budget properly.** Determine the maximum amount of the deposit and do not exceed it. Never borrow money to gamble. If you set a deposit limit of \$60 per week and received \$200 for the same week of the game, then you can make a deposit of \$260 next week.
- **Find a new hobby.** Find a new hobby and combine it with the game.

- **Good mood = good game.** Never play if you are depressed or stressed.
- **Sober Play.** We strongly recommend You don't drink alcohol before/during playing Casino's games.

2.3. Self-Control: Personal limits, Cooling-Off, Self-Exclusion

If You think that You start spending more money than you can afford, or in case gaming starts interfering with your normal daily routines, we strongly advise to consider several measures that can help, such as setting **Personal Limits** on your gaming activities, opting for **Self-Restraint** and **External Help** from trusted independent bodies.

2.3.1. How can You set Personal Limits?

To assist You in gambling responsibly we offer the **Personal Limits** feature:

- **Deposit Limit.** Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly). Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets. If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation. Any resolved or unresolved wagers made prior to the deposit limit being set in place remains unaffected regardless of the limits set.

If you want to setup any limits - you should contact choose the relevant option in Your account.

2.3.2. How can You take a break from gambling?

Should you need to take a break from gambling to prevent or control a possible gambling addiction, You can use our **Self-Restraint** facilities: Cooling Off and Self-Exclusion. Below you can study the differences between the two options:

	Cooling Off	Self-Exclusion
Wagering Prohibited	Player selection – all or by vertical.	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or All operator brands – as selected	All brands/domains under the operator's license
Duration	Min 24 hours	Min 1 year

Changes	Can be made more restrictive	None
Antepost bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing messages	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. Operator should have a plan to fully automate this process in short term.
Reactivation	Automatic	Player initiated

Vertical Options means:

- ALL gambling activity
- Restriction on individual product verticals offered by the operator (for example Casino, Fixed Odds Betting, Poker and other P2P games). Casino may be sub-categorised as All Games or Slots Only.

Brand Options means:

- The current brand (website and/or app)
- All of the operator's brand

2.3.3. How to set up Cooling-Off function?

To help you gamble responsibly, we offer the Cooling-Off Limit feature: you can set the timeout period to 24 hours, 7 days, 1 month, or 3 months. While the limit is active, you cannot make a deposit and place any wagers at the Casino all or by vertical, and you can withdraw the remaining funds during this period. The Cooling-Off period applies to your account immediately.

You can not reduce the Cooling-Off period. If you want to enable the Cooling-Off period, please follow the relevant section in your account.

2.3.4. How to set up Self-Exclusion function?

If you need to take a break from gambling to prevent or control possible addiction to gambling, you can use Our Self-Exclusion feature. In the case of Self-Exclusion, your account will remain blocked for a specified period of time without the possibility of renewal or completely closed.

If you want activate the Self-Exclusion period, please follow the relevant section in your account to choose a certain period of time: 1 year, 3 years, 5 years, 10 years, or lifetime. The request causes the immediate log-out after verification of Your identity. We will take all measures to block access to your account and will ensure that you do not receive any promotional material.

Self-exclusion does not automatically end at the end of the exclusion period.

2.3.4.1. How to change the duration of the Self-Exclusion period?

You can not shorten the Self-Exclusion period.

2.3.4.2. What happens after the end of the Self-Exclusion period?

After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account. Or once You attempt to log in after the exclusion period has ended, the relevant request will be sent to our Support team.

2.3.4.3. What happens to the bets and pending funds in my account?

We recommend you withdraw funds from your account prior to joining / requesting Cooling-off or Self-Exclusion. All our standard withdrawal rules apply until functions of Cooling-off or Self-Exclusion will be activated, after activation you will be restricted in any financial activity in your account.

We cancel all Your future game transactions.

Once You self-excludes, the wager is brought to an end. We will refund a Your wager if You enroll in a self-exclusion program prior to the commencement of an event or series of events on which the outcome of the wager is determined. We are not legally binding to refund a wager if self-exclusion program was activated after the commencement of an event or series of events on which the outcome of the wager is determined.

Return of the balance of unused funds will be made on Your request to our email [EMAIL]

2.4. Casino-Initiated Exclusion

The Casino may exclude a Player as a high-risk intervention measure if:

- The Player displays problematic gambling behaviour as described in clause 2.5. below;
- The Player attempts or engages in criminal activities through the operator's platform.

Casino-initiated exclusions is formally documented, and records will be kept for at least five years. The CGA may request these records at any time.

2.5. Player Risk Assessment and Protective Measures

The Casino monitors Players' gambling activity to identify signs of potential gambling-related harm and may assess a Player's Responsible Gaming risk profile based on their gaming and transactional activity and interactions with the Casino.

The assessment may take into account changes in deposit or wagering patterns, unusually long or frequent gaming sessions, repeated failed deposits or cancelled withdrawals, frequent changes to deposit limits, repeated requests for bonuses, attempts to circumvent restrictions, and other relevant behavioural indicators. A single indicator will not normally determine a Player's risk profile; the Casino will consider the Player's overall pattern of behaviour.

Where a Player is identified as being at risk, the Casino may contact the Player and take proportionate protective measures, including recommending or applying limits, temporarily restricting or suspending gambling activity, or excluding the Player from gambling where appropriate.

Material Responsible Gaming interactions and actions taken by the Casino will be recorded.

2.6. External Help

Should you require further help, there are a number of organizations that offer professional help free of charge:

GamCare – <https://www.gamcare.org.uk>

Gamblers Anonymous – <https://www.gamblersanonymous.org>

Gambling Therapy – <https://www.gamblingtherapy.org>

BetBlocker – <https://betblocker.org>

Gamban – <https://gamban.com>

GamBlock – <https://gamblock.com>

You can also contact us to share Your thought regarding Your gaming behaviour, for getting useful tips to gamble in responsible manner etc.

2.7. Self-Awareness

We perpetually improve our responsible gaming approaches. We will regularly inform You about updates and new features.

We will periodically measure whether You are aware of the information provided and whether You considered the information to be readily available.

Kindly ask You to not ignore our responsible gaming materials, notifications and announcements.

For self-assessment purposes, Players are encouraged to use the Casino's self-assessment tools and may review their betting and wagering history for at least the previous 6 months. Where a Player requests a longer transaction history, We will provide it within 10 working days, unless this is not reasonably achievable in the circumstances and an extension is legally permitted.

3. UNDERAGE GAMING CONTROL

3.1. Protection of minors

Underage gambling is against the law and is an offence (punishable act). In our online casino operating it is forbidden to gamble to persons under the age of 18, or if You are in a country where the law establishes a higher limit of legal age for online gambling, You should refrain from registering on the Website until reaching the legal age. We take its responsibility in respect of underage gambling very seriously and therefore reserve the right to ask for proof of age from any customer and to suspend their accounts until the necessary documents are provided.

This requirement is specified in the Terms & Conditions of Casino, so all the non-adult players who try to register on the website will be considered violators of our **GENERAL TERMS AND CONDITIONS**. The Casino reserves the right to report such violations to the competent authorities.

However, we realize that due to a wide availability and nature of the Internet people under the legal age still have a chance to register and play at an online casino. We therefore strongly encourage parents to cooperate in protecting their children from free access to gaming websites. There is special software that can help in this matter. We strongly recommend using special programs that restrict the access to online casinos, for instance:

- [CyberPatrol](#)
- [Contentwatch](#)
- [Netnanny](#)
- [Netmom](#)
- [GamBlock®](#)

We strongly recommend to switch off password remember features on Your devices.

3.2. Precautionary measures

- Do not leave minors unattended in front of a computer if you visit an online casino, or there are casino programs installed on your computer;

- Do not use the password memorization function if your children can use the same computer;
- Do not allow minors to visit gambling sites;
- Keep credit card or other payment system information out of the reach of children;
- Limit the time your children spend on the Internet.

If you have information that your underage child has personal account on Website, please contact our customer support [\(URL\)](#) or in LiveChat. After verification procedure Casino may take one of the below decisions on its own discretion:

- Keep account active if verification was successful;
- Block underage player's account till player will obtain full legal capacity;
- Close underage player's account.

4. WEBSITE ACCESS RESTRICTIONS

The following individuals are not eligible to play games on the Website:

- An individual under 18 years of age;
- Every individual who advises the Company that the individual is participating in a self-exclusion process that applies to the site;
- An individual who is known by the Casino to have been restricted from accessing the gaming site as a condition of a court order;
- Individuals who the Casino has reason to believe have been excluded from the site;
- Officers, members of the board of directors or partners of the Casino;
- Executives or staff of a trade union who represent or negotiate on behalf of employees employed at the site;
- Employees of registered suppliers who maintain or repair gaming equipment at the site;

The abovementioned Individuals are not eligible for prizes, with the exception of self-excluded individuals.

Version: [●] | Effective date: [●] | Publication date: [●]