



Curacao

RESPONSIBLE GAMING POLICY

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1. Introduction

Ragnarok Corporation N.V. (dba, and hereinafter referred to as “Pinnacle”), as a licensed operator by the Curacao Gaming Authority (“CGA”), is committed to upholding all regulatory requirements set by the CGA and the LOK. The intention of this document is to set forth Pinnacle’s policies to adhere to the LOK legislations and CGA License Conditions and is intended to support all accountable stakeholders to identify and interpret the danger signs of problem gambling that may be exhibited by customers on pinnacle.com.

This policy is an internal document and is not intended to be shared with pinnacle.com customers.

2. Regulatory Framework

Legislation	National Ordinance for Online Games of Chance	Landsverordening op de Kansspelen (“LOK”)
License Conditions	Conditions to Curacao Gaming License issued by the Curacao Gaming Authority (“CGA”)	Outline specific regulatory and operational obligations and provide guidance to operators to effectively implement the regulatory requirements.

3. Responsible Gambling Commitments

The licensee shall ensure that the players at all times are playing in a safe and secure environment.

Player Protection: *The aim is to ensure that all players can gamble in a safe, secure, and sustainable manner, mitigating the risk of gambling problems or gambling-related harm.*

Responsible Gambling is a key priority within Pinnacle; the business realizes that whilst the majority of customers can enjoy the Pinnacle product verticals responsibly, a small number may experience financial, social, emotional or psychological harm due to gambling. Pinnacle is committed to ensuring that all relevant stakeholders in the business adhere to the responsible gambling commitments stated below to prevent and minimize gambling related harms for all customers.

1. Self-excluded individuals and players at risk of gambling harm will be adequately safeguarded.
2. Player activity will be continually monitored, and risk assessed to identify at-risk players, where a player is highlighted as at-risk, Pinnacle will actively intervene to minimize or prevent gambling harm.
3. Internal departments will refer players displaying markers of gambling harm to the Responsible Gambling team for review and intervention.
4. Marketing materials shall be developed with social responsibility at their core, they will not knowingly target underage, at risk or self-excluded individuals, and will not promote excessive play or problem gambling behaviors.
5. Product design and features will not promote extended, continuous, or impulsive play and will embody low risk gambling behaviors.
6. A range of easy and obvious limit setting features will be available to all customers both at the point of registration and anytime thereafter to allow customers to control time and money spent on gambling.
7. Responsible gambling resources and information will be made available to all customers on, without limitation, Pinnacle's website and via education messages and campaigns to support informed decision making and promote responsible play.
8. Employees will be provided with training to understand the importance of responsible gambling and player protection and how this impacts their role. Employees interacting directly with customers will be provided with a tailored program of training designed to identify and respond to players displaying markers of gambling harm.

4. Scope

This Responsible Gambling Policy applies to all operational activity within the business relating to the provision of online gambling on pinnacle.com, including but not limited to:

- Marketing & Advertising
- Copy and Creative
- Customer Services
- Responsible Gambling Operations
- Legal, Compliance and Regulatory Affairs
- Website Content and Localization
- Business Development & New Market Entry

5. Roles & Responsibilities

The following roles are primarily involved in the delivery and execution of this Responsible Gambling Policy.

The Board

It is the responsibility of the Pinnacle Board to oversee the organization's compliance with all relevant regulations as carried out by accountable stakeholders. The Board ensures that Pinnacle has effective controls and policies in place to meet licensing obligations and regulatory requirements for its pinnacle.com operation.

Chief Executive Officer

The Chief Executive Officer is responsible for commercial functions and has appointed Executive Management to drive commercial activity in line with responsible gambling principles whilst still differentiating the business from its competitors.

Head of Risk & Compliance and MLRO Function

The Compliance function oversees the Regulatory Compliance team.

The Regulatory Compliance team are responsible for the oversight of all regulated market activity and ensuring that business has an effective system of controls in place to meet its regulatory and responsible gambling obligations.

Risk and Financial Crime function

The team consists of the MLRO and Deputy MLRO, AML, Financial Crime Risk, and Customer Due Diligence teams.

The AML team functions as the first-line operational team regarding AML & CTF compliance, including Watchlist Screening and Enhanced Due Diligence (EDD) competencies, as well as identification, mitigation, and internal/external reporting of Money Laundering ("ML") & Terrorist Financing ("TF") risks.

The Financial Crime Risk team functions as a Quality Assurance (“QA”) control and ongoing monitoring function regarding the work of the AML and CDD teams. The Financial Crime Risk team is led by the Deputy MLRO with main duties mirroring the MLRO.

The Customer Due Diligence team function

The CDD team is the first-line operational team overseeing know-your-customer procedures and practices, verifying customer documents, and maintaining electronic verification systems. Further, the Customer Due Diligence team acts as an escalator for the AML team when identifying relevant ML & TF risks during normal-course document reviews.

Customer Service Department (CSD)

CSD staff are the first point of contact for customer questions and concerns. Due to their customer facing role CSD staff are specially trained to recognize signs and patterns of problem gambling in customers and will engage the customer to assess what further actions are necessary. Further, the CSD team acts as an escalator to the RG team when identifying the risk of problem gambling in customers.

The MLRO and Deputy MLRO Role

The MLRO and their Deputy are responsible for, among other things, the following:

- Receiving internal Suspicious Activity Reports (“ISARs”);
- Considering ISARs received and evaluating whether there is ML or TF involved;
- Reporting any suspicious activity via Suspicious Activity Reports (“SARs”) to the appropriate authorities;
- Managing the AML/CTF and Sanctions Compliance program, policies, procedures, and controls;
- ML & TF and Sanctions risk assessments;
- Employee training in preventing ML, TF and sanctions evasion; and
- Ensuring fulfillment of Pinnacle’s obligations under relevant national and supranational legislation and regulation.

Director of Operations Function

Operational Compliance includes the Responsible Gambling team that are responsible for the ongoing monitoring and risk assessment of Pinnacle customers to prevent and minimize gambling related harms.

Employees

Pinnacle expects all employees to uphold and demonstrate the organization’s commitment to Responsible Gambling and player protection.

6. Player Monitoring & Risk Assessment

Player activity data is monitored on an ongoing basis using a range of daily, weekly, and monthly alert reports based on financial and behavioral indicators. The data alerts support the Responsible Gambling team to recognize potential risky behaviors and markers of harm such as large or increasing deposits, chasing losses, long sessions spent gambling, declined deposit methods, and large wagering volumes.

When the Responsible Gambling team identifies players at risk of gambling related harm, a responsible gambling review is completed which involves a wholistic assessment including, but not limited to, player activity, personal situation, previous gambling history, interactions and any information obtained through the course of the business relationship. Based on the information obtained and assessed during the player review, a risk assessment will be completed, and a risk level applied to the player.

The risk level applied to players is used to guide an appropriate level of player interactions and harm reduction actions in a timely and professional manner. A summary of player risk levels and actions is provided in Table 1 below.

Table 1: Player Risk Levels and Responsible Gambling Actions

Low	Medium	High	Critical
No Actions The customer risk level is within acceptable levels. Description Acceptable deposits Slight net loss Regular wagering activity No communication concerns. Actions No manual action required.	Proactive Actions The customer risk level increased due to potential concern, however, is still within acceptable level. Description Increase in deposit activity. Increase in limit changes. Increase in wagering activity. Potential communication concern Actions Potential RG signpost via email	Counteractive Actions The customer risk level is significant with a primary risk concern. The account may still be within an acceptable level but treat it with caution. Description Drastic increase in deposit/wager Significant decrease in withdrawal Communication concerns Self-assessed problem gambling Actions - Initiate on-going monitoring. - Potential RG signpost via email.	Affirmative Actions The customer risk level shows extreme primary concern as well as not being within acceptable level. Action to reduce potential harm to customers. Description Customer admittance to addiction Requesting to self-exclude. Customer actively communicating markers of harm. Actions Take immediate necessary action if; - Suicidal ideation - Self-harm - Depression - Mental illness - Incapability of sound judgement

7. Documentation and Record Keeping

Customer reviews and interactions conducted by the Responsible Gambling Team are logged within a Jira profile specific to each customer. All relevant information will be stored within each customer profile to include:

- Customer activity data
- Responsible gambling reviews, outcome and actions taken.
- Responsible gambling communications
- Responsible gambling escalations to other internal departments
- Follow up actions.

All data is held in line with legal requirements pursuant to applicable law and/or regulation and for no longer than is necessary to achieve the purposes of processing the data.

8. Supporting Informed Decision Making

Pinnacle is committed to encouraging safer play and supporting informed decision making. The Responsible Gambling hub and Help Centre are accessible from all webpages and once customers log in to their accounts; the responsible gambling content provided in these resources includes information on the following:

- Available responsible gambling tools and their application
- Responsible gambling advice
- Self-Assessment
- Self-exclusion, breaks in play and account closure
- Safer gambling tips
- Underage gambling and parental control

The Responsible Gambling team promotes safer play and encourages the use of responsible gambling tools within customer interactions. Depending on the risk profile of the customer and dialogue had within interactions, the Responsible Gambling team will guide customers to appropriate external resources in line with a customer's current gambling activity and personal situation.

Customers can access information relating to their betting and transactional history at all times. Within the 'My Account' section, customers can review and download transactional statements and review the type and volume of bets placed.

9. Responsible Gambling Tools

Pinnacle has a range of responsible gambling tools available to assist customers control their gambling activity and related spend, as summarized in Table 2 below. Information on the range of tools is available for customers to review at any time within the Responsible Gambling section of the pinnacle.com website. During customer interactions, Pinnacle CSD and Responsible Gambling employees will inform customers about the range of tools available to encourage safer play and support informed decision making by the customer.

9.1 Self-exclusion

Customers can access the self-exclusion option by either contacting our support for assistance or within the Responsible Gaming section in 'My Account'.

The customer can choose to either temporarily or permanently self-exclude their account by selecting a self-exclusion period of 6 months, 1 year, 3 years, 5 years or permanent.

The temporary self-exclusion period cannot be revoked early; however, it can be increased by any of the above-mentioned time periods offered by contacting Pinnacles CSD.

Once the temporary self-exclusion period has ended or a minimum of 6 months has passed for the permanent self-exclusion period, the customer can contact Pinnacles CSD to request access to the account again. This request is subject to a 24h cooling off period before reactivation takes place. During the cooling-off period, the customer can revoke the reactivation request by contacting Pinnacles CSD.

9.2 Time and Monetary limits

The customer can set or change their deposit limit at any time by either logging in to their account and set them within the Responsible Gaming section in 'My Account' or contacting Pinnacles CSD to request an amount as well as a daily, weekly, or monthly recurring period (every 30 days), while the Risk limit can be set or changed by contacting Pinnacles CSD. Revocation or any increase, is subject to a 24-hour cooling off period and a decrease in the limit is immediate as soon as a request is received by the CSD. If a customer changes their mind during the cooling-off period, they can contact CSD to cancel their request.

Any limit set will be set across all gaming verticals. How these limits are calculated, is explained within Pinnacles Responsible Gaming section on site where the customer has easy access to the information.

Table 2: Pinnacle Responsible Gambling Tools

Deposit Limits	- Helps customers limit overall gambling spend. - Deposit limit amount is selected by the customer for a daily, weekly, or monthly period.
Risk Limits	- Helps customers control amount wagered. - Risk amount selected by customer for daily, weekly, monthly period.
Session Limit	- Helps customers control the amount of time they spend logged in. - Customer can select maximum number of hours per session based on a daily, weekly, or monthly period.
Self-Exclusion	- Helps customers stay in control of their gambling by preventing access to their account for a defined period of time. - Customer can select exclusion periods of 6 months, 1 year, 3 years, 5 years, or indefinitely (permanent exclusion).
Self-Assessment Tool	- Allows customers to self-assess their current gambling activity and behaviors. - Customers are provided the option to complete Pinnacles Self-Assessment test and are also provided a link to Gamcare's Self-Assessment Tool.

10. Responsible Marketing & Advertising

Marketing and advertising activity is aligned with responsible gambling principles, business commitments, regulatory requirements as outlined in the Registrar's License Conditions Article 14.5 (for more information please refer to Curacao Marketing & Advertising Conditions Policy).

Responsible Gambling, Customer Protection and Social Responsibility are high priorities for Pinnacle, as such the business strives to ensure that social responsibility underpins the development of marketing and advertising materials.

Pinnacle make sure that our advertising activities:
are not misleading;

- do not make the chance of winning seem greater than it actually is;
- are not aimed at young people under the age of 18 or problem gamblers;
- do not give the impression that participating in games of chance offers a solution to financial or other personal problems; and
- do not suggest that gambling can be an alternative to work, a way to build financial security or be a financial investment.

11. Employee Training

Pinnacle is committed to ensuring all employees understand the importance of responsible gambling, how their roles impact player protection, the fundamental concepts of responsible gambling and problem gambling behaviors.

The Training & Development team provide mandatory responsible gambling training for all (new) employees. The online learning module covers responsible gambling topics including:

- Problem gambling and identifying at risk players.
- Problem gambling behaviors.
- Impact of problem gambling and associated gambling related harms.
- Supporting customers to play responsibly and make informed decisions.
- Responsible gambling tools, limit setting controls and resources.

Internal training sessions are also conducted by the Responsible Gambling team to support new starters and the general development of relevant knowledge and skills within the first line operational teams.

Employees interacting directly with potentially at-risk customers are provided advanced externally provided training from various certified third parties (annually) to suitably equip them to:

1. Identify customers at risk of gambling related harm.
2. Interact with customers displaying signs of problem gambling behaviors.
3. Interact and support customers at risk of self-harm.

The Regulatory Compliance team conducts horizon scanning and disseminates information to relevant stakeholders relating to changes in regulatory requirements, new regulatory guidance, relevant industry news and industry developments to operational teams.

12. Pinnacle Responsible Gaming Page

Within Pinnacle's Responsible Gambling page, Pinnacle provides access to available help and support resources for customers who need further information and support pertaining to their gambling. This page includes information about the Responsible Gambling tools offered at Pinnacle, such as time and monetary limits, self-assessment, and temporary or permanent self-exclusion.

It also gives advice on how to mitigate the risk of minors accessing the gambling site, support organizations the customer or others who may be affected can contact for further support and also a self-assessment test where the customer will get a better insight in their view on gambling.

Pinnacle believes in a shared responsibility where education is an effective approach to tackle problem gambling, while also guiding customers on how to mitigate their gambling and play responsibly and gamble sustainably.

13. Validity and document management

This document is valid as of the *Date of version* recorded on page 1 of this document.

The owner of this document is the Responsible Gambling Manager who must check and, if necessary, update the document on an as-needed basis, but no less than once annually, to verify that the changes throughout the year have been noted in this document.