

RESPONSIBLE GAMING POLICY

R Bostock Enterprises B.V.

Licensed under the Curacao Gaming Authority (CGA)

Approving Official(s)	Pulkit Totla
Responsible Office	Compliance Department
Effective Date	March 3, 2026
Next Review Date	March 3, 2027
Version	2.0

1. Policy Statement

R Bostock Enterprises B.V. is committed to providing a safe, fair, and responsible gaming environment for all players. Operating under license from the Curacao Gaming Authority (CGA) and in compliance with the National Ordinance for Games of Chance (LOK), the company implements comprehensive measures to protect players from gambling-related harm. This policy establishes the framework and standards that guide all activities related to responsible gaming practices across the organization.

2. Purpose

The purpose of this Responsible Gaming Policy is to:

- Establish a comprehensive framework ensuring the protection of all players from gambling-related harm
- Prevent problem gambling through proactive identification and intervention strategies
- Protect vulnerable persons and minors from exposure to gambling products and services
- Comply with all applicable CGA responsible gaming requirements and regulatory standards
- Maintain the integrity and reputation of R Bostock Enterprises B.V. as a responsible gaming operator
- Provide transparent information and tools enabling players to make informed decisions about their gaming

3. Audience

This policy is mandatory for all personnel and stakeholders associated with R Bostock Enterprises B.V., including:

- All employees and management staff
- Customer service representatives and support personnel
- VIP managers and player account managers

- Marketing and promotional staff
- Compliance and legal personnel
- Third-party partners, affiliates, and contractors

4. Definitions

Problem Gambling: A pattern of gambling behavior characterized by loss of control, continuation despite negative consequences, and impact on personal, family, or financial well-being.

Responsible Gaming: The implementation of policies, tools, and practices designed to promote safe and fair gaming while minimizing harm from excessive or problem gambling.

Self-Exclusion: A voluntary commitment by a player to refrain from accessing gaming services for a specified period or indefinitely.

Cooling-Off Period: A mandatory waiting period before a player can reverse a self-imposed limit or exclusion (typically 24-72 hours for limit increases).

Deposit Limit: A maximum amount of funds a player can deposit into their account during a specified time period (daily, weekly, or monthly).

Loss Limit: A maximum amount of net losses a player is willing to accept during a specified time period.

Session Limit: A maximum duration for continuous gaming activity, after which the player is logged out or restricted.

Wagering Limit: A cap on the total amount a player can stake on games during a specified time period.

Vulnerable Person: An individual identified as susceptible to gambling-related harm due to age, financial situation, mental health condition, or other risk factors.

Minor: Any person under the legal age of majority (under 21 years in Curacao).

Reality Check: Automated in-game notifications reminding players of the time spent and money wagered during their current session.

Time-Out: A temporary suspension of a player's account access for a period of hours or days to allow for reflection and recovery.

5. Policy Implementation

5.1 Age Verification

- All players must be a minimum of 21 years of age to access gaming services.

- Government-issued identification (ID) verification is mandatory before account activation and before deposits exceeding specified thresholds.
- R Bostock Enterprises B.V. utilizes advanced third-party age verification tools and document validation services to ensure compliance.
- Automated procedures are in place to detect and immediately close accounts identified as belonging to underage users.
- Marketing materials and promotional activities are strictly restricted to ensure no targeting of minors or minor-oriented audiences.
- Age verification data is maintained securely and reviewed regularly to ensure system effectiveness.

5.2 Player Protection Tools

R Bostock Enterprises B.V. provides an array of player protection tools that enable players to set personalized limits and maintain control over their gaming activities:

Deposit Limits: Players can set daily, weekly, and monthly deposit limits. Decreases take effect immediately; increases are subject to a mandatory 24-72 hour cooling-off period.

Loss Limits: Players can establish maximum acceptable loss amounts over specified periods, with the system automatically suspending play when limits are reached.

Session Time Limits: Players can set maximum session durations; the system automatically logs them out upon reaching the limit.

Reality Checks: Automated pop-up notifications display at regular intervals during play, informing players of time elapsed and money wagered.

Wagering Limits: Players can cap the total amount staked per session or per day.

Cool-Off Periods: Players may request temporary access restrictions for 24 hours, 7 days, or 30 days to take a break from gaming.

Account Closure Option: Players may permanently close their account at any time, with all funds returned and account marked as closed.

5.3 Self-Exclusion Program

R Bostock Enterprises B.V. operates a comprehensive self-exclusion program enabling players to voluntarily exclude themselves from gambling activities for specified or indefinite periods.

- Players may request self-exclusion for periods of 6 months, 1 year, or indefinite duration through customer service or the account settings portal.
- During self-exclusion, all deposit functionality is disabled, play is prevented, and marketing communications are ceased.
- Self-excluded accounts are flagged in the system and monitored to prevent unauthorized access or circumvention.

- Upon completion of a self-exclusion period, the player must undergo a mandatory minimum 24-hour cooling-off period before account reinstatement.
- Reinstatement requires completion of a responsible gaming assessment confirming the player's readiness to resume activity.
- R Bostock Enterprises B.V. maintains integration with any CGA-mandated centralized exclusion registry to prevent multi-operator circumvention.
- No promotional incentives or bonuses are offered to encourage re-registration or reinstatement of self-excluded accounts.

5.4 Identification of Problem Gambling Behaviors

R Bostock Enterprises B.V. maintains vigilant monitoring systems to identify indicators of problem gambling and problem gamblers requiring intervention:

- Chasing losses through rapid or escalating bets immediately after losses
- Erratic or irrational betting patterns inconsistent with player history
- Third-party complaints from family members or associates regarding gambling behavior
- Requests for payment plan information, loans, or credit extensions
- Aggressive or emotional behavior when experiencing losses
- Extended consecutive session times exceeding normal patterns
- Significant increases in deposit frequency, amounts, or wagering intensity
- Account activity at unusual hours or frequencies

All staff receive comprehensive training in identifying these behaviors. An automated behavioral monitoring system continuously analyzes player accounts, flagging accounts meeting risk criteria for manual review and intervention protocols.

5.5 Player Interaction and Intervention

R Bostock Enterprises B.V. implements a tiered intervention approach when problem gambling indicators are detected:

Level 1 - Automated Alerts: System-generated notifications inform players of concerning activity patterns with links to responsible gaming resources.

Level 2 - Customer Service Outreach: Trained customer service representatives contact the player to express concern and offer support resources.

Level 3 - Mandatory Information: Players receive mandatory information regarding gambling risks, available support services, and limit-setting tools.

Level 4 - Temporary Restrictions: Session duration or deposit limits are temporarily reduced or imposed without player consent.

Level 5 - Account Suspension: Accounts are suspended pending management review and the player's confirmation of understanding regarding gambling risks.

All player interactions, interventions, and outcomes are comprehensively documented. Escalation procedures are in place for cases requiring escalation to senior management or regulatory notification.

5.6 Marketing and Advertising Standards

- All marketing and advertising materials strictly prohibit targeting minors or previously self-excluded players.
- Bonus terms and promotional offers are presented clearly and accurately without misleading claims or hidden conditions.
- All marketing communications include responsible gaming messaging and prominent links to support resources.
- Social media advertising adheres to platform guidelines and includes age-gating and responsible gaming disclaimers.
- Affiliate marketing partnerships require explicit compliance with responsible gaming standards and prohibit deceptive practices.
- Marketing to vulnerable persons and high-risk groups is prohibited; sensitive targeting criteria are implemented.
- Promotional materials do not encourage gambling as a financial solution or way to recover losses.
- All affiliate partners are required to acknowledge and comply with this policy as a condition of partnership.

5.7 Staff Training

- Mandatory responsible gaming training is required for all staff members upon induction, prior to any customer-facing or decision-making role.
- Annual refresher courses ensure staff remain current on policy updates, regulatory changes, and emerging best practices.
- Specialized training is provided to customer-facing staff (support agents, account managers) on identifying and supporting problem gamblers.
- VIP managers and high-value player specialists receive advanced training on luxury player management while maintaining responsible gaming standards.
- Comprehensive records documenting all training completion, dates, and topics are maintained for regulatory review.
- Training effectiveness is assessed annually through competency evaluations and performance reviews.
- Staff demonstrating insufficient commitment to responsible gaming principles face disciplinary measures.

5.8 Vulnerable Persons Protection

- R Bostock Enterprises B.V. has established procedures to identify and protect vulnerable persons, including those with mental health conditions, cognitive impairments, financial difficulties, or addiction histories.
- Marketing and promotional activities are restricted to prevent exposure of vulnerable populations to gambling services.
- Accessible, clear information regarding problem gambling, its signs, and available support resources is prominently displayed throughout the platform and in customer communications.
- Direct links to recognized support organizations are provided, including GamCare, Gambling Therapy, the National Council on Problem Gambling, and regional support services.
- Customer service staff are trained to recognize indicators of vulnerability and respond with appropriate support and resources.
- No gambling products or services are offered to individuals identified as vulnerable without explicit assessment of their suitability.
- Vulnerable persons are prioritized for intervention when concerning behavioral patterns are identified.

5.9 Prohibited Players

The following categories of persons are prohibited from accessing R Bostock Enterprises B.V. gaming services:

- Residents of Curacao (unless specifically exempted by applicable CGA regulations)
- United States residents in jurisdictions where online gaming is restricted or prohibited
- Persons under the age of 21 years
- Persons listed on the self-exclusion registry, whether through R Bostock Enterprises B.V. or any CGA-affiliated registry
- Persons with documented problem gambling issues referred by regulatory authorities
- Individuals on court-ordered gambling prohibitions or protection orders

5.10 Financial Controls

- All player funds are segregated from operational funds in dedicated trust accounts, ensuring availability for timely withdrawals.
- Payment processing is transparent, with clear itemization of all transactions and no hidden fees or charges.
- Withdrawal requests are processed promptly according to published timelines, ensuring players can access their funds without unreasonable delay.
- No incentive structures or bonuses encourage rapid re-deposit of withdrawn funds.
- Regular financial audits ensure compliance with fund segregation and anti-money laundering requirements.
- Players receive clear statements detailing all deposits, wagering, and withdrawals for their records and verification.

6. Compliance and Consequences of Non-Compliance

All employees and stakeholders are required to strictly adhere to this Responsible Gaming Policy. Non-compliance carries serious consequences:

Staff Disciplinary Procedures: Employees violating policy provisions face disciplinary action up to and including termination of employment, depending on severity. All violations are documented and reviewed by senior management and compliance personnel.

Regulatory Penalties: Non-compliance may result in enforcement action by the CGA, including fines, license suspension, or license revocation.

License Conditions: Continued gaming license is contingent on demonstrated compliance with this policy and all CGA responsible gaming requirements.

7. Related Information

- CGA Responsible Gaming Guidelines and Standards
- National Ordinance for Games of Chance (LOK)
- R Bostock Enterprises B.V. Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) Policy
- R Bostock Enterprises B.V. Players Complaint and Dispute Resolution Policy
- Know Your Customer (KYC) Policy and Procedures
- Data Protection and Privacy Policy
- Terms and Conditions of Service
- Curacao Gaming Authority License Agreement and Conditions

8. Contact Information

Compliance Department	compliance@rbostockenterprises.com
Organization	R Bostock Enterprises B.V.
Regulatory Authority	Curacao Gaming Authority (CGA)

9. Policy History

Version	Date	Type	Description
2.0	March 3, 2026	New Policy	Initial adoption and implementation

Approval and Signature

By signing below, the approving official acknowledges having reviewed and approved this Responsible Gaming Policy and commits to its full implementation and enforcement throughout the organization.

A handwritten signature in black ink, reading "Totla Pulkit". The signature is written in a cursive style with a large initial 'T'.

Pulkit Totla

Date: March 3, 2026

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