

Responsible Gaming Policy

Entity: Eastpoint Operations N.V.

Version: Revised (Compliance Update)

Purpose: This document incorporates mandatory remediation actions identified in the compliance review and aligns with Curaçao GCB Responsible Gaming Guidelines and AML/CFT framework.

1. Purpose

This policy is aligned with the Curaçao Gaming Control Board (GCB) Responsible Gaming Guidelines and forms part of the Company's regulatory compliance framework.

The Company shall implement mandatory, enforceable controls to prevent and mitigate problem gambling.

2. Scope

This policy applies to:

- All platforms and player accounts
 - All employees and contractors
 - All third-party systems and providers used by the Company
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3. Governance & Responsibilities

3.1 Roles

- **Responsible Gaming Team (Owner):** Monitoring, detection, intervention
- **Compliance Officer (Reviewer):** Regulatory oversight and reporting

- **IT Team (Support):** System enforcement and controls implementation
- **Management (Escalation):** Risk decisions and approvals

3.2 Control Framework

Each control must include:

- Defined owner
- Review mechanism
- Escalation path

3.3 Escalation

All Responsible Gaming concerns must be escalated to the Compliance Officer within 24 hours.

4. Policy Statement

The Company shall implement mandatory controls to prevent and mitigate problem gambling, including:

- Enforced self-exclusion
- Behavioral monitoring
- Player intervention procedures

All controls are system-enforced and auditable.

5. Responsible Gaming Tools

5.1 Self-Exclusion (CRITICAL CONTROL)

Self-exclusion shall be enforced in accordance with GCB requirements and includes:

- Immediate blocking of player accounts
- Prevention of deposits and gameplay
- Suspension of all marketing communications

- Restriction of all account activity

Self-exclusion applies across all linked accounts.

The Company shall:

- Integrate GCB self-exclusion and involuntary exclusion lists
- Enforce minimum exclusion periods (minimum 5 years where applicable)

Self-exclusion cannot be reversed before the expiration of the agreed exclusion period.

6. Problem Gambling Detection & Intervention

6.1 Monitoring

Behavioral monitoring includes:

- Deposit frequency and escalation
- Loss patterns
- Session duration
- Behavioral changes

Defined thresholds must trigger alerts.

6.2 Intervention Process

1. Detection of risk indicators
2. Review by Responsible Gaming Team
3. Player contact and warning
4. Application of limits or restrictions
5. Mandatory self-exclusion where required
6. Documentation of actions

6.3 Ownership

The Responsible Gaming function under Compliance is responsible for monitoring and intervention decisions.

7. Player Protection Measures

7.1 Enforcement

All Responsible Gaming controls are system-enforced and cannot rely solely on player action.

7.2 Self-Exclusion Breach Handling

Any attempt to bypass self-exclusion must result in:

- Immediate account blocking
- Investigation of the breach
- Reporting to GCB where required
- Review of control effectiveness

All breaches must be documented and reported as required.

8. Player Limits

8.1 Enforcement

All limits must be enforced automatically by the platform and cannot be overridden manually.

8.2 Ownership

IT and Compliance teams are responsible for correct implementation.

9. Reality Checks

- Reality checks must be triggered at predefined intervals
- Cannot be disabled by players

10. Monitoring Systems & Tools

The Company must maintain and document:

- Player monitoring systems
 - Alerting tools
 - Risk detection engines
 - Enforcement mechanisms
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11. Advertising & Marketing

All marketing communications must:

- Include responsible gaming messaging
 - Be compliant with GCB requirements
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12. Legal & Regulatory Compliance

The Company operates in compliance with:

- Curaçao GCB Responsible Gaming Guidelines
 - Applicable laws and regulations
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13. Training & Awareness

13.1 Frequency

Responsible Gaming training shall be conducted at least annually.

13.2 Scope

Training includes:

- Identification of problem gambling
- Intervention procedures
- Self-exclusion handling
- Regulatory obligations

13.3 Tracking

Training completion must be recorded and available for audit.

14. SLA Framework

Defined timelines:

- Detection of risky behavior: Real-time / within 24h
 - Intervention: Within 24h of detection
 - Escalation: Within 24h
 - Reporting: As per regulatory requirement ($\leq 24h$ where applicable)
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15. AML Integration & Complaints

Responsible Gaming events must be assessed for AML risk and may trigger:

- AML investigation
 - Compliance escalation
 - Complaint handling procedures
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16. Continuous Improvement

- All Responsible Gaming events tracked in a remediation register
- Each issue assigned an owner and deadline

- Controls reviewed periodically for effectiveness
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17. Final Compliance Statement

This policy is:

- Operationally defined
- System-enforced
- Fully auditable

Aligned with:

- GCB Responsible Gaming Guidelines
 - AML/CFT framework
 - Regulatory enforcement expectations
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