

Responsible Gaming Policy

Hongda Information Technology B.V.

Version: 1.0

Date: March 2026

Submitted to: Curaçao Gaming Authority (CGA)

1. Introduction and Purpose

Hongda Information Technology B.V. ("the Operator") is committed to promoting a safe, transparent, and responsible online gaming environment in line with the principles of the National Ordinance on Games of Chance (LOK) and the Responsible Gaming Policy of the Curaçao Gaming Authority (CGA) dated 21 February 2025.

The purpose of this policy is to define the Operator's framework for ensuring that gaming remains a form of entertainment and does not cause harm to players or society. This document outlines the mandatory Responsible Gaming measures adopted by the Operator and the internal processes designed to prevent gambling-related harm.

2. Scope and Applicability

This Responsible Gaming Policy applies to:

- All gaming websites, mobile applications, and digital products operated by Hongda Information Technology B.V.;
- All employees, management, and contractors of the Operator;
- All affiliates, marketing partners, and third-party service providers acting on behalf of the Operator.

The policy covers all business activities in markets where the Operator holds or seeks authorization to offer games of chance under Curaçao's regulatory framework.

3. Governance and Responsible Gaming Oversight

The Operator recognizes the importance of internal accountability in implementing Responsible Gaming measures.

- The Compliance Officer of Hongda Information Technology B.V. will serve provisionally as the Responsible Gaming Officer (RGO) until a dedicated individual is

appointed.

- The RGO is responsible for ensuring compliance with this policy, monitoring its effectiveness, and reporting to executive management at least once every 12 months.
- Reports shall include recommendations for improvement and updates to align with evolving CGA requirements.
- Any material change to this policy will be reported to the CGA within a reasonable timeframe.

4. Player Protection Principles

The Operator is committed to:

- Protecting vulnerable individuals, including minors and those at risk of gambling addiction;
- Promoting awareness of responsible gambling tools;
- Ensuring that gambling is conducted fairly and transparently;
- Monitoring and mitigating potentially harmful behavior;
- Complying with all regulatory reporting and auditing obligations established by the CGA.

5. Player Information and Accessibility

To promote transparency and player awareness:

- A Responsible Gaming link will be displayed prominently on the Operator's homepage and on all relevant pages of its platforms.
- The Responsible Gaming Policy will be available in English and in the language(s) of the target markets.
- The website will include direct access to tools for:
 - Setting deposit and time limits;
 - Initiating cooling-off or self-exclusion;
 - Accessing support and external help resources.

- The website footer will clearly display:
 - “No underage gambling (18+)”;
 - The Operator’s name and registered address;
 - The Curaçao license number and CGA Digital Seal;
 - A link to responsible gambling support resources (e.g., GamCare, GambleAware, Gamblers Anonymous).

6. Age Verification

The Operator enforces strict age verification procedures to prevent underage gambling.

- No person under 18 years of age may participate in any gaming activities.
- Verification includes:
 - Date of birth confirmation at registration;
 - Government-issued ID verification (passport, national ID, or driver’s license);
 - Cross-checking payment methods and personal data.
- If an account is found to belong to a minor:
 - Access is denied immediately;
 - All deposits are refunded (subject to AML restrictions);
 - Winnings are forfeited and reported to the CGA.

The Operator maintains complete records of all verification attempts for audit and regulatory purposes.

7. Player Self-Assessment and Behaviour Tracking

Players are encouraged to assess their gambling behavior through self-assessment tools such as:

- The Gamblers Anonymous 20-Question Test; or
- The CAGE Questionnaire (Adapted for Gambling).

Behavioral monitoring is conducted to detect problematic activity, based on indicators including:

- Sudden increases in deposits or wagers;
- Reversal of withdrawals;
- Prolonged sessions without breaks;
- Multiple account attempts or payment method changes;
- Repeated use of cooling-off or self-exclusion features.

The Operator uses a combination of trained staff and technological tools (AI/ML) to identify and act upon concerning patterns.

8. Player Interaction and Intervention Procedures

When potentially problematic behavior is identified:

1. The RGO or trained support staff will contact the player in a sensitive and professional manner.
2. The player will be informed about available Responsible Gaming tools.
3. If necessary, deposit limits, temporary suspension, or permanent exclusion may be applied.
4. All interactions and interventions will be recorded within the player management system.

Escalation to the Compliance Officer or RGO will occur for serious or repeated incidents.

9. Cooling-Off and Self-Exclusion

Cooling-Off

Players may choose a temporary break from gaming (24 hours, 7 days, 1 month, or 3 months).

- The feature is available through a single-click function on the website;
- Activation is immediate and fully automated;
- Players cannot be persuaded to cancel or delay activation.

Self-Exclusion

Players may self-exclude for 1, 3, 5, 10 years, or permanently.

- The process must be completed fully online and take effect immediately;
- All gaming activity is blocked and funds (subject to AML) refunded within two business days;
- Self-excluded players are removed from all marketing lists;
- Reactivation after exclusion requires written confirmation and completion of a Responsible Gaming acknowledgment.

10. Deposit and Play Limits

Players may set daily, weekly, or monthly deposit limits at any time.

- Lower limits take effect immediately;
- Requests to increase limits take effect only after a 7-day waiting period;
- Additional limit types (e.g., loss limits, session time limits) are available depending on game type;
- Reality check alerts remind players of session duration and current balance before resuming play.

11. Marketing and Advertising Compliance

The Operator ensures that all advertising complies with CGA Responsible Gaming standards:

- No marketing to minors, self-excluded, or vulnerable persons;
- No portrayal of gambling as an investment or solution to financial issues;
- No misleading or exaggerated claims;
- No emotional or sexual manipulation in content;
- All ads must include a Responsible Gaming message and reference to support organizations;

- Affiliates, influencers, and partners are contractually bound to comply with these standards;
- Direct marketing (email, SMS, push notifications) is disabled during self-exclusion or cooling-off periods.

12. Recordkeeping, Reporting, and Review

- All Responsible Gaming activities (self-exclusion, interventions, limits) are logged and retained for at least seven (7) years.
- Any breach or failure in controls will be reported to the CGA within five (5) working days, including corrective actions.
- This policy will be reviewed annually by the Responsible Gaming Officer and updated as necessary to reflect CGA amendments or operational changes.

Approved by:

Hongda Information Technology B.V.

Compliance Officer / Acting Responsible Gaming Officer