

mBet Solutions N.V. (Curaçao)

RESPONSIBLE GAMING POLICY

v1.0

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Version Control

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2. Purpose

The purpose of this Responsible Gaming Policy is to set out the principles of mBet Solutions N.V. ("The Company") to ensure the requirements of social responsibility are met. The Company has adopted the Responsible Gaming Policy to set the responsibilities of The Company to ensure that all staff are aware of and understand the legal and regulatory responsibilities towards The Company's customers, and to ensure The Company's employees and staff is adhering to a high level of knowledge base while practicing the principles set out in this document.

3. Policy Statement

The Company is committed to providing safe and responsible means and tools to its customers when accessing The Company products and services. The Company's aim is to ensure that Customers using its products and services have access to the required controls which enables The Company's customers to make informed decisions about gambling. The Company is also committed to recognise, and further educate its employees to recognise, any and all possible indications of Problem Gambling, and take appropriate steps upon the identification in order to protect its customers.

4. Scope

The policy applies to all employees and sets out procedures for recognition and correct actioning of the signs and suspicion of Problem Gambling and Gambling addiction, with the aim to prevent a potential harm originating from gambling activity where the Problem Gambling identifiers would apply.

This policy is also a commitment of The Company to ensure the high level of the knowledge base within the areas of Responsible Gambling and Social Responsibility. The policy defines procedures that will assist the staff of The Company to comply with its legal obligations and to



make the 'right' decision and action upon the ability to recognise the alarming signs of Problem Gambling.

5. Review and Changes

This policy is reviewed annually or after any significant events, by the Compliance Officer (CO) and approved by the Board of The Company.

6. Responsible Gaming

The Company commits to protect the vulnerable and underage individuals from gambling related harm while safeguarding the mBet Solutions brands in accordance with its regulatory requirements. Ensuring that The Company customers' well-being remains top priority.

The Company believes that by cultivating a Compliance Culture of responsible gaming, empowering individuals to make informed decisions and providing support for those who may need it, The Company can contribute to a safer, regulated and healthier gambling environment for all.

Tools for Responsible Gaming:

Player Self-Assessment

We encourage players to regularly assess their gaming habits to determine whether their gambling remains within healthy limits. The following self-assessment tool shall allow the players to answer a series of questions designed to help identify potential problem gambling behaviours:

Gamblers Anonymous – a 20 question quiz that is published on its website.
<https://gamblersanonymous.org/20-questions/>

Cooling-Off Period

Customers can voluntarily take a break from gambling by requesting a temporary suspension of their accounts for 24 hours by contacting customer support via email 24 hours a day 7 days a week. Alternatively, if deemed necessary or beneficial, The Company will implement a 24-hour cooling-off period without customer request. Once a 24-hour cooling-off period has been applied and confirmed with the customer via chat or email, it will not be removed, decreased or reverted.



The player shall be made aware of the difference between Cooling Off period and Self-Exclusion and shall be offered the opportunity to proceed directly to Self-Exclusion if they so choose.

Self-Exclusion

All self-exclusion requests will be initiated with a click of a button. The player shall be outlined clearly the steps required in order to self-exclude and shall include the following:

- **Self-Exclusion Process:** A detailed outline of the steps required for a player to initiate self-exclusion.
- **Duration Options:** A comprehensive list of available self-exclusion periods.
- **Benefits of Self-Exclusion:** An explanation of how self-exclusion can help prevent problem gambling and support responsible gaming practices.

This policy ensures that players have access to clear, transparent, and accessible information to make informed decisions regarding their gaming behavior.

The customer will be informed of the available self-exclusion time frames;

- 1 year
- 3 years
- 5 years
- 10 years
- permanent self-exclusion

Alternatively, if deemed necessary or beneficial The Company will implement a self-exclusion without customer request.

Once a self-exclusion has been applied and confirmed with the customer, the self-exclusion can not be removed, decreased or reverted. A permanent self-exclusion will never be reverted.

Education and Awareness

In addition to a specific page detailing our Self-Exclusion Terms and Conditions, a dedicated Responsible Gambling Information Page is available on The Company site. For registered customers, this is available in two locations:

- The Responsible Gambling Information page hyperlink is found in the site's footer and the site's Help Centre.
- Unregistered customers or customers not logged in, can still access the Responsible Gambling Information page hyperlink found in the sites' footer.
- The following are also found in the footer of each and every page of the website:



- Under-age logo
- Name and registered address of the company
- Official license number issued by the Curacao Gambling Authority
- A statement confirming the regulatory oversight of the Licensee's operations by the Curacao Gaming Authority.
- A link to the Responsible Gaming Policy Statement.
- The operator's CGA digital seal.

Website links:

Link	Company
https://sportsbet.io/support/responsible-gambling	mBet Solutions N.V.
https://bitcasino.io/help-center/help-your-account/responsible-gaming	Moon Technologies B.V.
https://livecasino.io/help-center/help-your-account/responsible-gaming	Moon Technologies B.V.

At Sportsbet.io, Bitcasino.io and Livecasino.io, our customer's wellbeing is of utmost importance. We take our role within responsible gambling very seriously and recommend that you:

- *Treat your betting and gaming as a form of entertainment and only use money that you have set aside for your entertainment.*
- *Do not bet or wager amounts larger than you are comfortable with.*
- *Do not bet or wager with money you cannot afford to lose.*
- *Do not chase your losses.*
- *Do not let your betting and or gaming take up time that you would usually spend on other activities.*

In addition, customers are reminded that:

Gambling of all varieties has been a popular form of entertainment for many years. Here at Sportsbet.io, Bitcasino.io and Livecasino.io, we encourage it to be exactly that, fun. We also encourage our customers, while having fun, not to allow their gambling affect their usual daily routine or time spent with family and friends. Making sure that the money they spend is set aside for leisure time and not for other purposes. It is very important not to rely on paying for life's necessities with possible gains from gambling, as this is not guaranteed in any way.

Within the Responsible Gambling information and also in the footer of each and every page of the website, customers are directed to 3 accredited responsible gambling organisations. Every customer entering the self-exclusion program is also supplied with these links when being informed of the available self-exclusion time frames.

- <http://www.gamcare.org.uk/>
- <https://keepitfun.rank.com/>
- <https://www.gamblingtherapy.org/>

7. Problem Gambling

Problem gambling occurs when an individual loses control of their gambling behaviour, which compromises, disrupts or damages the individuals' wellbeing, life, family, finances, work or recreational pursuits.

Common indications of problematic gambling include but are not limited to:

- Spending more than intended or chasing losses.
- Gambling as an escape from stress or personal issues.
- Neglecting personal or professional responsibilities due to gambling.

Responsible Interaction

Proto Responsible Gambling flow chatbot - AI supported -

All customers, excluding VIPs who have a bespoke 1-1 individual service, are directed to Proto chatbot before reaching an agent.

Customers requesting account closure are asked to confirm the reason for closure.

General and responsible gambling requests are directed to the corresponding specific email addresses and are actioned by a customer support agent.

Severe concerning comments are automatically directed to a trained customer support agent.

Any responsible gambling related queries are answered via pulled site information (Responsible Gambling Information and Self-Exclusion Terms and conditions pages) and expanding AI learned responses.



Customer Support Led Interaction

Through responsible gambling training and quarterly knowledge-based testing, the customer support agents are trained to identify problem gambling triggers. When and how to initiate a responsible gambling interaction and how to respond to responsible gambling concerns. Ensuring to offer support to customers, encouraging a break from gambling, informing them of the available self-exclusion program and sharing support links to organisations offering online advice and counselling

Cooling-Off Period

Customers can voluntarily take a break from gambling by requesting a temporary suspension of their accounts for 24 hours by contacting customer support 24 hours a day 7 days a week, this will be actioned straight away, manually by customer support agent. All associated accounts will be blocked, logging the customer out of active gaming sessions, and they will no longer be able to access their affected accounts. At the end of the 24-hour cooling-off period, while the account or all associate accounts across all 3 brands are still closed, the customer will be informed of the available self-exclusion time frames.

Customers are prompted to inform the Casino if they wish to proceed with a self-exclusion or account reactivation. (Reactivation after a 24-hour cooling-off period is not offered to customers that mentioned loss of control, addiction, or severe concerning comments.)

Self-Exclusion

As per item 6. Responsible Gaming/Self-Exclusion.

Self-exclusion Completion

At the end of the customer's self-exclusion, customer support will be internally alerted of the completion, generated from time stamped account tags that were applied in accordance to the customer's request. The self-exclusion will not automatically release and allow access to the customers' account, this action is manually completed by the customer support agents.

Depending on the case background, customers will be either informed via email that their accounts have been reopened, and customer support will reactivate the accounts. Alternatively, they will be emailed while the account is still closed, informed of the self-exclusion completion, and asked how they would like to proceed; reactivate or extend. If we do not receive a response within 24 hours, the customer will be alerted that the account will be reopened after a further 24

hours if still no response. If this is the case, the customer support agents will reactivate all accounts affected.

Non-Voluntary Self-Exclusions

Customers displaying concerning triggers, behaviours or raising concerning comments via email or chat will have a 24-hour cooling-off applied to all accounts across the 3 brands, manually, by customer support immediately, whether requested or not. This will be communicated in chat if that is where the discussion takes place but will always be confirmed via email to the customers' registered email address.

All further steps will be decided on a case by case basis, by the Responsible Gambling Team. Be it a permanent self-exclusion or an enforced shorter break.

Self-Exclusion and Data Deletion

These types of requests will be treated as a permanent self-exclusion immediately and will affect all accounts across all 3 brands. Confirmation of permanent self-exclusion will be sent via email, including confirmation of data deletion taking place within 72 hours. The data deletion will be actioned by a customer experience team member.

8. Player Protection Measures

Cross Brand - Sister Site Self-Exclusion and Self-Exclusion Breaches

The Company commits to aligning voluntary or non-voluntary self-exclusions with its sister brands to ensure extended protection for vulnerable customers. This means accounts held in its sister platforms under Moon Technologies are also included in any mBet Solutions brand's self-exclusions and vice versa. Account associations, be it cross-brand or potential multiple accounts within 1 platform, are detected by Frauds fingerprint technology which consists of multiple factors. This means if a customer has more than 1 account using, or has ever used the same device, crypto wallet address or email address (including email addresses that have the same beginning but different domain and the same supplied D.O.B) at registration or have been manually linked internally by The Fraud Team, Responsible Gambling Team or customer support agents, they will be officially linked and treated as they belong to the same customer. Additionally, if The Fraud



Team detects accounts that have or do supply the same KYC documents via 3rd party KYC tools Shufti Pro or Sumsb, they will also be linked.

Retroactive, checks can be completed by the Fraud Team, such as combinations of IP similarities, gameplay and alternative device compatibilities. In addition, Chain Analysis, to determine Crypto movement between accounts.

Self-Exclusion Breaches

By using the same fraud fingerprint technology, the Casino detects any new account registration attempts of customers under an active self-exclusion. Once detected, an automated immediate block is placed on the new account for the duration of the active self-exclusion. If a permanent self-exclusion is in place, the newly registered account will remain closed forever. Customer support agents are alerted by an internal prompt and confirm the actions taken with the newly registered customer via email.

Transaction Data

Customers have full access to their lifetime bet, deposit and withdrawal transactional history. This data is time, and date stamped and can be found on site, within the deposit page of their account, enabling the customer to review their spending at their own leisure. Alternatively, this information can be supplied via email, if desired, by customer support agents upon email request, in PDF format. In addition, more detailed specific game round activity transaction reports are available upon request in PDF format.

Behavioural Monitoring

To assist VIP manager led responsible gambling interactions, 3rd party site navigation tool - Fullstory creates internal alerts which notify VIP managers when their customers review responsible gambling specific pages, information, or terms and conditions, on the site. This prompts a review of the customers, wagering, communications and responsible gambling history. Followed by an informative interaction or self-exclusion implementation if desired or required.

Our 24 - hours 7 days a week customer service agents are trained to understand and identify potential problem gambling triggers; furthermore when and how to take action, be it requested by the customer or deemed necessary for the customers' wellbeing.

All customers who have partaken in the self-exclusion program, or have required or instigated a responsible gambling interaction, have an internal responsible gambling file listing their responsible gambling history in chronological order.

Underage

Upon registration, customers are required to supply their date of birth, an underage date is not available or accepted. In addition, customers are required to confirm, via a tick box, that they are over 18 years of age and have reviewed and agreed with the terms and conditions.

The following advice is also available on the sites' Responsible Gambling Information page:

If you wish to gamble with us at Sportsbet.io, Bitcasino.io or Livecasino.io, you must be over 18 years of age or the legal minimum age for gambling in the jurisdiction you remain under the laws applicable to you, if younger.

We recommend if you have any minors living in your household, to review the following parental control software links, which could prove a useful tool, regarding control and restrictions of the content accessible on your devices.

<https://www.netnanny.com/>

Underage cases are detected by multiple triggers:

- Fraud and payment withdrawal triggers are met, that require KYC documentation which confirms the customer is underage.
- KYC submission – independently supplied by the customer or requested by Fraud which highlights inconsistencies or confirms the customer is underage once submitted. These scenarios create an internal alert for customer support, in an underage dedicated channel. The Fraud Team reviews the documents and informs customer support of confirmed underage cases in an underage dedicated internal channel.
- Internal department disclosure, for example The Social Media Team or Affiliate Team alert the customer support agents of customer statements via external platforms, or 3rd parties raising concerns via external platforms.
- User lead – Customers informing us that they are underage.
- Parent/guardian/3rd party claim that their child/or a minor has created an account.
- A parent informs us that a minor has accessed their account.
- Non depositor/no activity customers confirming they are underage.
- Customers asking to change the D.O.B they supplied at registration.
- Customers raise suspicions via comments in chat/email for example, 'can I use my mums account,' 'I've lost my school funds/money' etc

Once underage suspicion is raised, customer support immediately, manually closes all associated accounts as determined by the same fraud fingerprint technology as used with self-exclusions. Upon account block implementation, the customer will be logged out of all game sessions, marketing and promotional materials are frozen, and they will no longer be able to access their

accounts. Additionally, all accounts held in our sister platforms under Moon Technologies are also included in any mBet Solutions brand's underage investigations and vice versa.

Alternatively, if detected and confirmed that the customer is underage by the Fraud Team, they will manually close all affected accounts and inform customer support, who in both situations, will communicate via email to the customer the actions that have been taken. All further email communications will be directed to the parent or legal guardian.

Official government identification documents are required to be submitted via 3rd party KYC software Sumsb if not already obtained. As the customer will no longer have access to their account, the Responsible Gambling Team will share links to the service via email.

The following documents are required:

- A capture of the minor's official government document, front and back.
- A picture of the minor holding their official government document, with all four corners visible.
- A capture of the parent or legal guardians' official government document, front and back.
- A picture of the parent or legal guardians holding their official government document, with all four corners visible.
- A picture of the minor and parent or legal guardian together holding their respective official government documents

Once completed, both minor and parent or legal guardian will be required to complete Veriff, a 3rd party video identification tool, separately.

If the investigation concluded that the customer was underage, all affected accounts remain closed. If any activity has taken place, all Net deposits covering the period the customer was underage are returned to the legal guardian.

Underage Breaches

By using the same fraud fingerprint technology, we detect any new account registration attempts of customers under an active underage investigation or confirmed and closed underage cases. Once detected, an automated immediate block is placed on the new account for the duration of the active investigation. If confirmed that the customer is underage, the newly registered account will remain closed forever. Customer support agents are alerted by an internal prompt and confirm the actions taken with the newly registered customer via email.

9. Limits

Player can set up deposit limits in order to control their gambling activity. Players can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

Players can tighten their limits at any time, with changes taking effect immediately. However, any request to relax a limit will be subject to a mandatory waiting period to ensure decisions are made thoughtfully and responsibly.

Deposit limits

- Players can set deposit limits for a specified period (daily, weekly, or monthly).
- Once the limit is reached, no further deposits can be made until the period resets.
- Requests to lower a deposit limit take effect immediately, while requests to increase a limit are subject to a mandatory seven-day waiting period before implementation.

10. Reality Checks

Reality Check measures shall include the following:

1. A real-time session timer that remains visible at all times while the player is logged in.
2. Players have the option to activate customized reality check alerts at designated time intervals. When triggered, the alert will require players to acknowledge the message before resuming play. Additionally, players will be given the option to either end their session or continue playing, promoting responsible gaming practices.

Customised Reality Checks shall suspend play momentarily and require the player to confirm they have read the message before resuming play.

1. Advertising and Marketing

After registering an account with mBet Solutions brands, customers can opt out of receiving marketing and promotion materials by navigating the 'preferences' section of their profile on the site. Alternatively, customers can request to opt out of marketing and promotion materials by contacting customer support, available 24 hours a day 7 days a week, at any time in their account life cycle.

For customers entering the self-exclusion program, accounts are immediately logged out of game play sessions, account access is blocked and the sending of all marketing and promotional materials are frozen for the duration of the time frame selected.



12. Legislation

The Company is incorporated and licensed in the jurisdiction of Curaçao with the regulatory body being The Curaçao Gaming Control Board (GCB). Therefore, it is imperative to ensure that effective risk assessments, policies, procedures, and controls are in place to prevent the events of unidentified Problem Gambling occurrence while using The Company's services, and continue to raise standards in that regard.

The following pieces of Legislation place obligations on The Company and its employees with respect to Responsible Gambling:

- AML/CFT/PF Regulations (20 May 2024)
- National Ordinance of the 20th of December 2024 Containing Rules concerning Games of Chance (National Ordinance on Games of Chance - LOK)
- Responsible Gaming Policy for Licensed Operators Version 1.0 (21 February 2025)

13. Training

Staff Training

Our training objective and goal is to:

- Define responsible gambling and its importance for individuals and businesses.
- Identify behavioural, emotional, and financial warning signs of problem gambling.
- Educate on how to deliver responsible gambling messages through chat, email, and automated alerts.
- Educating employees about responsible gambling features
- Ensuring consistent and precise application of processes in line with company policy

All employees of The Company, of all departments, upon the start of employment, complete a 2-day Yolo Take-Off introduction to the company within their first month of employment. This company induction is held in person with a presentation and additionally contains a mandatory responsible gambling module, consisting of a video containing a brief explanation of varying stages of problem gambling, identifiable behaviours and triggers, company commitment and a brief run through of our self-exclusion program.

Within their first month of joining, all customer-facing teams - customer support agents and VIP managers complete 9 hours of responsible gambling and underage process training over 3 days. This is conducted face-to-face by the Responsible Gambling Team, or remotely dependent on the employees' location. This training consists of a step-by-step guide of the self-exclusion process, voluntary request and out lines, when, why and how to approach or initiate a responsible gambling interaction or implement and non-voluntary self-exclusion.

Once the 3-day responsible gambling training is completed, customer support agents and VIP managers are required to complete a new started Knowledge sense check. Multiple attempts are accepted, however, a mandatory 100% score is required, for training sign off. When applicable, a senior team lead is invited to attend the new starter training.

Thereafter, every year quarterly responsible gambling knowledge sense check and refresher tests must be completed by all customer-facing teams. These tests consist of a mix of multiple choice questions, manual input required answers and true or false selection. Covering an array of real life case examples, testing knowledge of process changes and testing understanding of how and when to interact with customers. Multiple attempts are accepted, however a mandatory 100% is required to pass. Incorrect and correct answers are highlighted with detailed explanation.

Mandatory	100%	score	required.
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Retrospective process adherence checks are completed by the Responsible Gambling Team daily. If any process inconsistencies have occurred, a detailed report is created and shared with the individual to highlight and further outline the correct process.

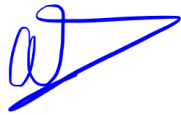
Escalation

Any problematic behaviour identified shall be escalated to the Compliance Officer or Responsible Gaming officer who shall assess each case and determine whether further restrictions, exclusions, or responsible gaming interventions are necessary.



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Date: March 2025

Signed:



3/31/2025

