

**ORANGE ENTERTAINMENT B.V.**

**RESPONSIBLE GAMBLING POLICY**

## CONTANTS

|       |                                                             |                                     |
|-------|-------------------------------------------------------------|-------------------------------------|
| I.    | INTRODUCTION .....                                          | 4                                   |
| II.   | POLICY OVERVIEW .....                                       | 4                                   |
| 2.1.  | General Responsible Gaming Policy .....                     | 4                                   |
| 2.2.  | High-Risk Business Model .....                              | 4                                   |
| III.  | MANDATORY REQUIREMENTS .....                                | 5                                   |
| 3.1.  | Core Responsible Gaming Elements.....                       | 5                                   |
| 3.2.  | Responsible Gaming Governance and Accountability.....       | 5                                   |
| IV.   | PREVENTION OF UNDERAGE GAMBLING .....                       | 6                                   |
| 4.1.  | Age Verification .....                                      | 6                                   |
| V.    | PLAYER INFORMATION AND ACCESSIBILITY .....                  | 7                                   |
| 5.1.  | Responsible Gaming Section and Accessibility.....           | 7                                   |
| 5.3.  | Terms & Conditions Inclusion.....                           | 8                                   |
| 5.4.  | Footer Information Requirements .....                       | 8                                   |
| VI.   | SELF-ASSESSMENT .....                                       | 8                                   |
| 6.1   | Access to Account History .....                             | 9                                   |
| 6.2   | Purpose of Self-Assessment .....                            | 9                                   |
| 6.3   | Self-Assessment Tools Provided .....                        | 9                                   |
| 6.4   | Company Support and Follow-Up .....                         | <b>Error! Bookmark not defined.</b> |
| 6.5   | Reporting and Continuous Improvement.....                   | 10                                  |
| VII.  | BEHAVIOUR TRACKING .....                                    | 10                                  |
| 7.1   | Key Monitoring Factors .....                                | 11                                  |
| 7.2   | Procedures for Player Identification and Intervention ..... | 11                                  |
| VIII. | COOLING-OFF AND SELF-EXCLUSION.....                         | 13                                  |
| 8.1   | Cooling-Off .....                                           | 13                                  |
| 8.2   | Self-Exclusion .....                                        | 14                                  |
| 8.3   | Operator-Initiated Exclusion .....                          | 16                                  |
| IX.   | LIMITS .....                                                | 16                                  |
| 9.1   | Deposit Limits.....                                         | 16                                  |
| 9.2   | Exceptions to Limits and Exclusions .....                   | 17                                  |
| 9.3   | Transparency and Communication.....                         | 17                                  |
| 9.4   | Technical Enforcement .....                                 | 17                                  |
| X.    | TRAINING AND STAFF READINESS.....                           | 18                                  |
| XI.   | CONSUMER ADVERTISING AND MARKETING .....                    | 18                                  |

|      |                                              |    |
|------|----------------------------------------------|----|
| XII. | ENHANCED RESPONSIBLE GAMBLING MEASURES ..... | 19 |
| 12.1 | Internet Filtering Tools .....               | 19 |
| 12.2 | Direct Player Interaction .....              | 19 |
| 12.3 | Other Limits .....                           | 19 |

## **I. INTRODUCTION**

This Responsible Gaming Policy outlines the principles and procedures applied by Orange Entertainment B.V. to ensure that all gaming activities are conducted responsibly and in compliance with the requirements of the Curacao Gaming Authority.

The purpose of this Policy is to protect vulnerable persons, prevent gambling-related harm, and promote a safe and transparent gaming environment.

It applies to all staff, systems, and third parties involved in the operation of the Company's licensed online gaming platforms.

## **II. POLICY OVERVIEW**

### **2.1. General Responsible Gaming Policy**

The Company is committed to maintaining a safe, transparent, and fair gaming environment where gambling remains an enjoyable form of entertainment rather than a source of harm. The Company integrates Responsible Gaming principles into all areas of its business operations and applies proactive measures to prevent gambling-related harm and protect vulnerable persons.

The Responsible Gaming framework of the Company includes the following core elements:

- A clear Responsible Gaming Policy that is easily accessible to players at all times.
- A comprehensive suite of Responsible Gaming tools and educational resources designed to promote healthy play and prevent excessive gambling.
- Continuous monitoring mechanisms to identify and address early signs of problematic gambling behaviour.
- Full compliance with applicable regulatory reporting, monitoring, and auditing obligations.

The Company does not offer a credit to players for the purpose of gambling under any circumstances.

The Responsible Gaming Policy is reviewed annually and submitted to the Curacao Gaming Authority for evaluation and approval. All material changes are reported to the CGA in accordance with licensing requirements.

### **2.2. High-Risk Business Model**

As the players may include VIP/high-roller players, the Responsible Gaming Policy incorporates enhanced measures proportionate to these risks. Such measures include increased monitoring frequency, advanced behavioral analytics, and mandatory escalation protocols to ensure the highest standard of player protection.

The Company does not allow direct cryptocurrency usage or any intermediary/agent account.

### III. MANDATORY REQUIREMENTS

The Company implements the following Responsible Gaming measures as mandatory components of its operational framework in compliance with the licensing requirements of the Curacao Gaming Authority.

These elements are integrated into the Company's daily operations, systems, and player interaction procedures to ensure continuous compliance and effective harm prevention.

#### 3.1. Core Responsible Gaming Elements

The mandatory elements include:

1. Age Verification – strict prevention of underage gambling through multi-layered age and identity checks.
2. Information Accessibility – ensuring that all Responsible Gaming tools, policies, and resources are easily accessible and clearly visible to players.
3. Player Self-Assessment – availability of self-evaluation tools to help players recognize risky behaviours.
4. *Behaviour Tracking – systematic monitoring of player activity and early detection of potential problem gambling indicators [to be implemented by end of March 2026].*
5. *Cooling-Off Periods – functionality enabling players to take short-term breaks from gambling activities [to be implemented by end of March 2026].*
6. Self-Exclusion – effective, long-term exclusion options available to players across all brands and platforms.
7. *Deposit Limits – player-controlled financial limits (daily, weekly, and monthly) [to be implemented by end of March 2026].*
8. Consumer Advertising and Marketing Controls – responsible promotional practices that do not target vulnerable persons.
9. Staff Training and Readiness – regular training of employees involved in customer-facing and marketing functions.

These elements collectively form the Company's Responsible Gaming control environment and are continuously tested, reviewed, and enhanced to align with evolving regulatory expectations and operational risks.

#### 3.2. Responsible Gaming Governance and Accountability

The Company designates a competent person responsible for overseeing Responsible Gaming activities within the organization. Until a dedicated Responsible Gaming Officer is appointed, the Compliance Officer (separate from the AML/CFT function) assumes this responsibility.

The Responsible Gaming Officer is responsible for:

- implementing and enforcing this Policy across all departments and operational entities;
- ensuring that all Responsible Gaming controls are functioning effectively;
- reviewing incidents and escalating material findings to senior management;

- preparing and submitting an annual Responsible Gaming Effectiveness Report to management, summarizing operational performance, identified deficiencies, and recommendations for improvement.

This report is presented at least once every twelve (12) months and serves as the basis for management review and strategic updates to the Company's Responsible Gaming program.

#### **IV. PREVENTION OF UNDERAGE GAMBLING**

The Company enforces robust measures to ensure that no individual under the legal gambling age participates in any gambling activity provided under the Company's Curacao gaming licence.

Preventing underage gambling is a cornerstone of the Company's Responsible Gaming framework and is treated as a matter of zero tolerance.

##### **4.1. Age Verification**

The Company doesn't permit minors to participate in games of chance.

The Company applies a multi-layered age verification process designed to confirm that all players are of legal gambling age (18 years or older).

##### **4.1.1 Verification Process**

- During account registration, each player must declare their date of birth and confirm that they are over 18 years of age by selecting an explicit confirmation checkbox.
- The system automatically blocks registration attempts where the entered date of birth indicates that the individual is underage.
- Prior to the withdrawal which exceeds 2,000 EUR, and in any case upon reaching thresholds defined under the Company's KYC and AML procedures, the player must submit a valid government-issued identity document (such as a passport, national ID, or driver's licence).
- The document is verified through secure third-party services and/or manual review by the Company's verification team.

##### **4.1.2 Supplementary Verification Measures**

The Company may, where appropriate, apply additional verification controls including:

- electronic database or government registry checks;
- payment method validation;
- selfie or biometric verification;
- cross-checks with third-party identity verification providers.

These methods are used to enhance assurance but do not replace the requirement for government-issued ID verification.

#### **4.1.3 Detection and Action in Case of Minor Accounts**

If, at any stage, it is discovered that an individual registered or engaged in gambling while being a minor:

- the player account is immediately closed;
- all deposited funds are refunded to the payment source, and any winnings are forfeited;
- the player is notified in writing of the reason for the account closure;
- internal records are updated and flagged to prevent re-registration attempts.

#### **4.1.4 Record Keeping**

The Company maintains comprehensive records of all age verification checks performed, including:

- verification dates and methods used;
- document types and verification results;
- any exceptions or escalations handled.

#### **4.1.5 Awareness and Communication**

The Company prominently communicates the prohibition of underage gambling by:

- displaying the “18+” symbol and warning notices on its websites and mobile applications;
- including an explicit statement in the footer of each website confirming that gambling is prohibited for minors;
- ensuring that all marketing, promotions, and social media content exclude any appeal to minors or depictions of underage individuals.

### **V. PLAYER INFORMATION AND ACCESSIBILITY**

The Company ensures that all information related to Responsible Gaming is easily accessible, clearly visible, and presented in a manner that enables players to make informed decisions.

#### **5.1. Responsible Gaming Section and Accessibility**

The Company maintains a dedicated and easily identifiable Responsible Gaming Section on all brand websites and mobile applications.

A clear and permanent link to this section is displayed on the homepage and within navigation menus, ensuring that players can access Responsible Gaming information at any time.

The Responsible Gaming Section:

- provides clear and easily understandable information on how players can manage their gambling activity responsibly;
- offers direct access to Responsible Gaming tools, including self-exclusion, cooling-off periods, limit setting, and reality checks;
- includes contact option (email) for Responsible Gaming inquiries;

- is available in English and in the language of the target market, with English prevailing in the event of discrepancies.

All Responsible Gaming information is presented in clear, accessible language and reviewed regularly to ensure compliance with regulatory requirements and player protection standards.

### **5.3. Terms & Conditions Inclusion**

The Company explicitly references Responsible Gaming obligations and tools within its Terms & Conditions (T&C).

Accordingly:

- the Responsible Gaming Section is incorporated by reference in the T&C and linked within one click from the homepage;
- the T&C contain a clear explanation of available player protection tools (self-exclusion, deposit limits, cooling-off, etc.) and their functionality *[the deposit limits, colling- off will be implemented by the end of March 2026]*,
- all information regarding Responsible Gaming measures is presented in a transparent and comprehensible way, ensuring that players understand how to activate and use each feature.

The Responsible Gaming provisions within the T&C are updated promptly following any regulatory or operational change.

### **5.4.Footer Information Requirements**

The Company ensures that every website and application operated under its license includes, in the footer of the homepage, the following mandatory information:

- A clear and visible indication that underage gambling (under 18) is prohibited.
- The name and registered address of the licensed company.
- The official licence number issued by the Curacao Gaming Authority (CGA).
- A statement confirming the regulatory oversight of the Company's operations by the CGA.
- A link to the Responsible Gaming Section.
- The CGA Digital Seal issued to the licensee.
- A direct link to one or more reputable problem-gambling support organizations, such as *GamCare, Gamblers Anonymous*.

All such links are periodically reviewed to ensure functionality and relevance.

## **VI.SELF-ASSESSMENT**

The Company promotes player awareness and self-control by providing transparent access to account information and practical tools for self-evaluation.

These mechanisms enable players to monitor their gambling activity, recognize early warning signs of harm, and make informed decisions about their play.

## **6.1 Access to Account History**

The Company ensures that every player has continuous access to a detailed record of their gaming and transactional history, including:

- timestamps of deposits, withdrawals, wagers, and wins;
- amounts and types of games played;
- active bonuses or limits applied to their account.

The account history covers a minimum of six (6) months and is accessible directly through the player account interface.

Longer historical data may be requested by the player and is provided within ten (10) working days of request receipt.

If additional time is objectively required (e.g., due to technical limitations), the Company documents and justifies the delay while maintaining transparent communication with the player.

All account data are stored and processed in line with applicable data-protection and retention requirements.

## **6.2 Purpose of Self-Assessment**

The self-assessment process encourages players to regularly reflect on their gambling behaviour and to recognise whether their activity remains within healthy, recreational limits. The Company provides tools and questionnaires that help players identify potential risks and take control of their behaviour before it escalates into harm.

Players are prompted, both proactively and through the Responsible Gaming Section, to complete a voluntary self-assessment whenever behavioural markers indicate signs of potential risk (e.g., increased frequency of play, cancelled withdrawals, repeated limit changes).

## **6.3 Self-Assessment Tools Provided**

*[to be implemented by end of March 2026].*

The Company makes available recognized and scientifically validated screening tools, such as:

### **(a) Gamblers Anonymous 20-Question Test**

Accessible directly via the Responsible Gaming Section and linked to the official website of Gamblers Anonymous (<https://gamblersanonymous.org/20-questions/>).

This tool enables players to evaluate whether their gambling habits may be developing into a problem.

## **(b) CAGE Questionnaire (Adapted for Gambling)**

Players are invited to answer the following four short questions honestly:

1. C – Cut Down: Have you ever felt you should cut down on your gambling?
2. A – Annoyed: Have people annoyed you by criticising your gambling habits?
3. G – Guilty: Have you ever felt guilty about your gambling?
4. E – Eye-Opener: Have you ever gambled first thing in the morning to steady your nerves or recover from losses?

### **Interpretation of Results:**

- 0 “Yes” answers: Low risk of gambling problems.
- 1 “Yes” answer: Moderate risk; further self-monitoring is recommended.
- 2 or more “Yes” answers: High risk; the player is encouraged to use Responsible Gaming tools such as deposit limits, time-outs, or self-exclusion, and to contact professional support services.

## **6.4 Reporting and Continuous Improvement**

The Company periodically analyses anonymized self-assessment statistics to monitor trends and enhance its Responsible Gaming framework.

Findings are included in the annual Responsible Gaming Effectiveness Report prepared by the Responsible Gaming Officer, which is submitted to senior management for review.

## **VII.BEHAVIOR TRACKING**

*[to be implemented by end of March 2026].*

*The Company applies continuous, structured monitoring of player behavior to identify early indicators of problematic gambling and to implement timely, proportionate interventions that mitigate harm.*

*This process is an integral part of the Company’s Responsible Gaming framework and is executed in accordance with Article 1.4(e) of the National Ordinance on Games of Chance (LOK), which prohibits offering gaming opportunities to any person who can reasonably be assumed to be vulnerable.*

*The Company performs a holistic behavioral analysis, combining transactional, sessional, and interactional data to assess the overall gambling profile of each player.*

*The objective is to detect high-risk patterns early and apply targeted interventions that support responsible play without disrupting legitimate customer activity.*

*Behavior monitoring is performed jointly by:*

- *the Responsible Gaming Officer,*
- *Customer Support and VIP teams, who maintain direct contact with players, and*

- *automated analytical systems, including risk-flagging algorithms and AI-based detection models integrated into the Player Account Management (PAM) and CRM environments.*

*A structured escalation process ensures that potential signs of harm are verified, documented, and addressed with traceable accountability.*

### **7.1 Key Monitoring Factors**

*The Company monitors a comprehensive set of behavioral indicators to detect patterns consistent with gambling harm.*

*An isolated indicator does not automatically classify a player as problematic; rather, risk is assessed based on a combination of multiple concurrent and persistent factors.*

*Key factors include:*

- *Deposit and wagering frequency: sudden or unexplained increases in frequency or amounts wagered.*
- *Failed transactions: repeated payment attempts declined for insufficient funds or card limits.*
- *Withdrawal reversals: frequent cancellation of withdrawal requests.*
- *Extended or abnormal play sessions: prolonged activity without significant breaks.*
- *Excessive communication with support: agitation, frequent bonus requests, or signs of emotional distress.*
- *Repeated limit adjustments: frequent setting, changing, or removing of deposit, loss, or session limits.*
- *Cooling-off exploitation: repeated short-term breaks without long-term behavioural change.*
- *Credit-based play patterns: attempts to use maxed-out cards or third-party payment methods.*
- *Multiple-account attempts: creation of duplicate accounts to bypass limits or self-exclusion.*

*The PAM system automatically logs and flags these activities. Alerts are reviewed daily by the Responsible Gaming Officer or delegated compliance personnel.*

*In addition to behavioral and transactional data, the Company considers contextual information (e.g., time of day, payment source, geography) to enhance detection accuracy.*

### **7.2 Procedures for Player Identification and Intervention**

*The Company maintains a documented and auditable process for identifying and managing cases of potential gambling harm.*

*This process is embedded within the operational workflows of Customer Support, Risk, and Compliance teams, ensuring consistency and accountability.*

### **7.2.1 Player Profiling and Risk Assessment**

- *Each player account is associated with a dynamic risk profile within the PAM system, incorporating behavioural, transactional, and communication data.*
- *A risk-based monitoring approach determines the intensity and frequency of oversight, using defined thresholds and scoring parameters.*
- *All Responsible Gaming interactions, whether initiated by the player or the Company, are recorded in the PAM system with timestamps, staff identification, risk category, and outcomes.*
- *The Responsible Gaming Officer periodically reviews and validates flagged cases to ensure proportionality and compliance with internal procedures.*

### **7.2.2 Responsible Gaming Interventions**

*When risk indicators meet or exceed the intervention threshold, the Company undertakes the following graduated measures:*

*1. Informative Intervention:*

*The player is contacted via chat or email and provided with information about available Responsible Gaming tools (deposit limits, time-outs, self-exclusion).*

*2. Restrictive Measures:*

*If behaviour persists, the Company may apply temporary or mandatory restrictions, including:*

- *enforcement of deposit or wagering limits;*
- *suspension of gaming activity pending further assessment;*
- *referral to self-exclusion processes.*

*3. Permanent Exclusion:*

*In cases of confirmed or severe gambling-related harm, the player account is permanently closed, and future access is restricted across all Company brands.*

*Under no circumstances may the Company use Responsible Gaming measures as a pretext to delay or block legitimate withdrawals.*

*Any misuse of protective interventions for commercial advantage constitutes a breach of licence obligations and is strictly prohibited.*

### **7.2.3 Documentation and Oversight**

*Each Responsible Gaming case file includes:*

- *player identifiers and account data;*
- *risk indicators detected and timestamps;*
- *actions taken and justification;*
- *outcome and closure notes.*

*All cases are subject to periodic audit by the Compliance Department to verify procedural adherence and effectiveness.*

*Lessons learned are incorporated into training programs and continuous improvement initiatives.*

## **VIII.COOLING-OFF AND SELF-EXCLUSION**

The Company maintains effective processes and technological tools that empower players to manage their own gambling behavior through self-regulation and temporary or long-term restrictions.

Two mechanisms are permanently available via the Responsible Gaming Section on all Company websites and applications:

- *Cooling-Off: a short-term, temporary restriction from gambling activities, customizable by the player [to be implemented by end of March 2026].*
- Self-Exclusion: a long-term, irrevocable exclusion from all gambling activities covered by the Company's license.

Players are free to choose either mechanism without influence or persuasion from the Company.

The Company prohibits any bonuses, incentives, or reassurances intended to discourage players from activating these options.

Players are clearly informed of the differences between both mechanisms before confirming their selection.

### **8.1 Cooling-Off**

*[to be implemented by end of March 2026].*

#### **8.1.1 Overview**

*The Company offers players the option to activate a Cooling-Off period during which they are temporarily restricted from gambling activity.*

*Players can choose the following parameters:*

1. *Duration (mandatory);*
2. *Marketing Opt-Out (mandatory);*
3. *Brand Scope (all Company brands or current brand only);*
4. *Vertical Scope (specific product categories, e.g. Casino, Sports, Poker).*

*Players select their preferences through unticked checkboxes in the Cooling-Off interface to ensure voluntary consent.*

#### **8.1.2 Duration Options**

*Available durations include:*

- *24 hours*
- *7 days*
- *1 month*

- 3 months

### **8.1.3 Brand and Vertical Options**

*Players may choose to apply the restriction to a single brand or to all brands operated by the Company. The restriction can cover all gambling activities or be limited to specific verticals.*

### **8.1.4 Actions and Implementation**

*The restrictions take effect immediately upon activation.*

*The Company:*

- *does not question or discourage the player's decision;*
- *does not offer bonuses or promotions during this period;*
- *does not delay activation under any circumstances.*

*For Cooling-Off periods of one (1) or three (3) months, the Company may request an online confirmation ("You wish to cool off for one month. Please confirm.") — expressed neutrally and processed automatically.*

#### **Player Account Management:**

*During the Cooling-Off period, player funds remain accessible for withdrawal, and the account stays open while all gambling functions are disabled.*

#### **Marketing and Communications:**

*Players who have opted out of marketing do not receive any promotional content throughout the Cooling-Off period, and no bonuses, free play, or other incentives are offered during this time.*

### **8.1.5 Reactivation**

*After the selected Cooling-Off period expires, the account is automatically reactivated. No further player action is required.*

## **8.2 Self-Exclusion**

### **8.2.1 Overview**

The Company enables players to self-exclude from all gambling activities for a fixed, non-revocable duration.

The self-exclusion parameters include:

1. Duration: minimum of one (1) year.
2. Brand: all brands and domains operated under the Company's license.
3. Vertical: all forms of gambling activity.
4. Marketing: automatic opt-out from all promotional communications.

Players can complete the self-exclusion process entirely online without the need for email or manual approval.

### **8.2.2 Duration Options**

The following durations are available:

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime

### **8.2.3 Actions and Implementation**

The self-exclusion takes effect immediately after activation.

The Company ensures that:

- player accounts are closed and login access is disabled;
- all wagering after the self-exclusion request but before enforcement is voided and refunded to the player (subject to AML/CFT controls);
- any ongoing tournaments may be completed before closure;
- contributions to progressive jackpots remain valid but participation ceases after exclusion.

#### **Verification and Consent:**

The player confirms awareness of the exclusion duration through a neutral online confirmation (e.g., “You have chosen to self-exclude for five years. Please confirm.”).

#### **Duplicate Account Prevention:**

The Company maintains robust procedures to detect and block new accounts attempted by self-excluded individuals, including name, email, payment method, and device checks.

#### **Marketing and Communications:**

No direct or indirect marketing communications are sent to self-excluded players for the duration of the exclusion.

### **8.2.4 Reactivation**

At the end of the self-exclusion period, the player must submit a written request (via email) to reopen their account.

Reactivation cannot occur automatically and cannot be initiated by the Company. The exclusion remains irreversible and irrevocable for the full selected duration.

The Company retains all records of self-excluded players in accordance with applicable retention periods.

Any known payment method linked to a self-excluded player is blocked for future use during the exclusion period to prevent circumvention.

### **8.3 Operator-Initiated Exclusion**

The Company reserves the right to exclude a player as part of its Responsible Gaming and risk-management procedures where necessary to prevent gambling-related harm.

Operator-initiated exclusion may be applied when:

- a player displays persistent problematic gambling behaviour;
- there is reasonable evidence of criminal or fraudulent activity on the account;
- the exclusion is deemed necessary to protect the player or the integrity of operations.

Operator-initiated exclusions are fully documented, justified, and recorded in the Player Account Management (PAM) system.

All records are retained for a minimum of five (5) years and are made available to the Curacao Gaming Authority upon request.

Players are notified in writing of the exclusion reason and duration.

## **IX.LIMITS**

*[to be implemented by end of March 2026].*

*The Company provides players with responsible gambling tools that enable them to control their own gaming behaviour by setting deposit limits.*

*These limits may be applied on a daily, weekly, or monthly basis, allowing players to tailor their financial boundaries to personal gaming habits and risk appetite.*

*The Company ensures that deposit limit functionalities are clear, accessible, and user-friendly across all brands and platforms.*

*Limits are processed automatically through the Player Account Management system to ensure integrity, transparency, and immediate enforcement.*

### **9.1 Deposit Limits**

*Players may set restrictions on the total amount of funds they are permitted to deposit within a defined period (daily, weekly, or monthly). Once a limit is set, the PAM system enforces the restriction consistently across all channels.*

*The following operational principles apply:*

- *Deposit Cap Enforcement:*  
*Once a player's deposit limit is reached, no further deposits can be processed until the relevant period resets.*
- *Limit Modification Rules:*

*Requests to increase an existing limit (i.e., make it less restrictive) take effect after a mandatory 24-hour cooling period.*

*Requests to decrease a limit (i.e., make it more restrictive) take effect immediately.*

*Players are informed of these timelines when submitting a change request.*

- *Ongoing Bets and Game Sessions:*

*Any wagers (resolved or unresolved) placed before the limit activation remain valid and unaffected.*

*The limit applies only to new deposits after implementation.*

## **9.2 Exceptions to Limits and Exclusions**

*The Company recognizes that certain active wagers may temporarily interact with limit enforcement, including but not limited to:*

- *Ongoing participation in a poker tournament when a time or deposit limit is reached.*
- *Ante-post bets placed on future events that remain unresolved when a new limit or exclusion is activated.*

*In these specific cases:*

- *the restrictions take effect immediately upon completion of the active gameplay or wager;*
- *until the active event concludes, no new wagering activity or tournament entry is permitted;*
- *once the active wager or tournament ends, the deposit limit becomes fully enforceable and applies automatically.*

*The Company maintains strict control measures to ensure that deposit limits and exclusions cannot be overridden or bypassed under any circumstance.*

## **9.3 Transparency and Communication**

*All information about limit-setting options, modification rules, and applicable cooling periods is clearly displayed within the Responsible Gaming Section and player account settings.*

*Players receive on-screen confirmations whenever a limit is set, modified, or triggered.*

*Customer Support staff are trained to assist players in understanding these tools without influencing them to increase or remove restrictions.*

## **9.4 Technical Enforcement**

*The Company applies automated and auditable system controls within the PAM and payment gateway environments to guarantee that deposit limits are technically enforced in real time.*

*All limit-related actions, including player requests, approvals, and execution timestamps, are recorded and retained for compliance audit purposes.*

## **X.TRAINING AND STAFF READINESS**

The Company trains all customer service and Responsible Gaming staff to handle player interactions professionally, empathetically, and in accordance with Responsible Gaming standards.

Training covers, at minimum:

- recognising signs of gambling distress, such as agitation, aggression, or financial desperation;
- conducting sensitive and structured conversations with at-risk players;
- directing players to appropriate support services and Responsible Gaming tools.

Training materials are reviewed periodically to ensure alignment with regulatory updates and best practices in Responsible Gambling management.

## **XI.CONSUMER ADVERTISING AND MARKETING**

The Company does not engage in irresponsible advertising or any activity that could encourage excessive or harmful gambling.

All marketing and communication activities comply with Curacao Gaming Authority standards and Responsible Gaming principles.

The following requirements apply:

- No targeting of vulnerable persons: Marketing, including all visual materials, must not directly or indirectly target vulnerable groups or minors.
- No portrayal of gambling as an investment: Advertising must not depict gambling as a means to achieve financial success or resolve financial issues.
- No misrepresentation of skill versus chance: Marketing materials must not suggest that skill can influence the outcome of games of chance.
- No emotional manipulation: Gambling must never be presented as a substitute for emotional, mental, or financial well-being.
- No minors or inappropriate content: Marketing materials must not include minors or depict them engaging with gambling content.
- No explicit or sexualised content: All adverts and messaging must remain appropriate and free of any pornographic or suggestive imagery.
- No linkage with harmful behaviors: There must be no association between gambling and smoking, drug or alcohol use, seduction, or enhanced attractiveness.
- Bonus transparency: All bonuses and promotions are communicated clearly, with full terms and conditions available to players.  
Bonuses must not be used to promote excessive gambling or encourage risky behavior.
- Third-party involvement: The Company remains responsible for all materials prepared or distributed by affiliates, representatives, sponsorships, ambassadors, or paid social media influencers.  
All third parties must be made aware of, and agree to comply with, the Company's Responsible Gaming Policy.

- Responsible Gaming message: Every advertisement must include a clear and visible Responsible Gaming message or slogan.

## **XII. ENHANCED RESPONSIBLE GAMBLING MEASURES**

*[to be implemented by end of March 2026].*

*Based on the level of business risk, the Company may implement enhanced Responsible Gambling measures when necessary.*

*Higher risk may arise from the Company's business model, player demographics, or the number of players engaging in self-exclusion or cooling-off measures.*

### **12.1 Internet Filtering Tools**

*To prevent underage gambling, the Company reminds players to secure access to their devices, accounts, and payment details when minors may be present.*

*The Company also provides information about third-party software that can restrict access to gambling websites. Examples include BetBlocker ([betblocker.org](https://betblocker.org)), GamBlock ([gamblock.com](https://gamblock.com)), Gamban ([gamban.com](https://gamban.com)).*

### **12.2 Direct Player Interaction**

*The Company may employ automatic or manual pop-up notifications in response to concerning behaviors. Such notifications include direct links for the player to contact a trained Responsible Gaming professional.*

*When a player exhibits behavior suggesting potential vulnerability, the Company initiates direct communication advising the player to review the Responsible Gaming Section and consider the available tools and support services.*

### **12.3 Other Limits**

*In addition to deposit limits, the Company may offer other types of player-set restrictions, including loss limits, time limits, or wager limits, where relevant to the target market and risk profile.*

| DOCUMENT CREATION     |                  |                                                                                                                                                                                                                                   |                                                                                                                   |              |
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| Author(s) of Document |                  | Legal                                                                                                                                                                                                                             |                                                                                                                   |              |
| Purpose of Document   |                  | The purpose of the company’s Responsible Gaming Policy is to promote safe and ethical gambling practices by protecting vulnerable individuals, preventing problem gambling, and ensuring compliance with regulatory requirements. |                                                                                                                   |              |
| Security level        |                  | Low                                                                                                                                                                                                                               |                                                                                                                   |              |
| Authorised By         |                  | Paweł Piętak, MLRO                                                                                                                                                                                                                |                                                                                                                   |              |
| CHANGE CONTROL        |                  |                                                                                                                                                                                                                                   |                                                                                                                   |              |
| Version               | Date of Issue    | Author(s)                                                                                                                                                                                                                         | Brief Description of Changes                                                                                      | Approved By  |
| 1.0                   | December 1, 2022 | Legal                                                                                                                                                                                                                             | Initial release                                                                                                   | Paweł Piętak |
| 1.1                   | December 1, 2023 | Legal                                                                                                                                                                                                                             | Annual review                                                                                                     | Paweł Piętak |
| 1.2                   | December 1, 2024 | Legal                                                                                                                                                                                                                             | Annual review                                                                                                     | Paweł Piętak |
| 2.0                   | May 1, 2025      | Legal                                                                                                                                                                                                                             | Full revision of the Responsible Gaming Policy to align with CGA Responsible Gaming Policy for Licensed Operators | Paweł Piętak |