

Policy for safeguarding the responsible offering of Games of Chance

Version 1.0 as of April 22, 2025

1. Introduction

This Policy for safeguarding the responsible offering of Games of Chance (the “Policy”) has been adopted and implemented by the Operator according to the National Ordinance of the 20th of December 2024 Containing Rules concerning Games of Chance (National Ordinance on Games of Chance of Curacao) (the “LOK”) and the Responsible Gaming Policy for Licensed Operators (Version 1.0) adopted by Curacao Gaming Authority on the 17th of April, 2025) (the “Responsible Gaming Policy”).

The purpose of this Policy is to integrate Responsible Gaming principles into the Operator’s business model, ensuring that gambling remains an enjoyable form of entertainment rather than a source of harm. The Policy includes proactive steps and processes to protect Vulnerable Persons, promote responsible gambling along with mitigation or prevention of problem gambling behaviour. As a general principle no credit can be offered to players for the purpose of wagering.

This Policy is aimed to guarantee that: a) players can play in a safe and secure environment; b) Games of Chance are fair and clear to players; c) no Vulnerable Persons can play Games of Chance; d) players can limit or discontinue their playing of Games of Chance where such playing threatens to become an addiction for them.

This Policy includes provisions to prevent Vulnerable Persons from playing Games of Chance, including: a) general information about gaming addiction made available to gamblers; b) Vulnerable Person identification procedures; c) measures in place to prevent excessive gaming or the threat of excessive gaming; d) the possibilities provided to gamblers to exclude themselves from playing Games of Chance.

2. Definitions

In this Policy the capitalized terms have the following meanings:

Curaçao Gaming Authority or CGA means Stichting Gaming Control Board (Gaming Control Board Foundation), formed by notarial deed of April 19, 1999, either under this name or under any adjusted name in the event of amendment of its articles of association.

Cooling Off means a pre-determined period that can comprise hours, days or months which is set by the player during which time the player may not place any wagers whatsoever.

Games of Chance means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players’ insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker.

LOK is the National Ordinance on Games of Chance law of Curacao.

Marketing, promotion and advertising refer to all resources, messages and media that promote the Operator’s domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns.

Mandatory Requirements are the basic elements of the Policy.

Minor means any person under the age of 18.

Operator is Progress Path Co N.V. (company number 164185, registered address Emancipatie Boulevard, Dominico F. "Don" Martina 31, Willemstad, Curaçao) which is a holder of an Orange Digital Seal "Certificate of Operations" (application OGL/2024/1113/0517)

Self-exclusion is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with the Operator.

Vulnerable Person means a person who:

- i. is under eighteen years of age;
- ii. has no, or insufficient, control over his or her gambling behavior, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people;
- iii. has been banned from playing any Game of Chance either by force or at his or her own request;
- iv. has been declared bankrupt, or has otherwise lost the control or disposal of all or part of his or her property.

Other capitalized terms not expressly defined herein are to be interpreted according to LOK, Responsible Gaming Policy, or general industry practice.

3. Mandatory Requirements

This Policy includes the following mandatory Responsible Gaming elements for operational compliance with the CGA gaming license:

1. Age verification (Section 4)
2. Information accessibility (Section 5)
3. Player self-assessments (Section 6)
4. Behaviour tracking (Section 7)
5. Cooling-off Periods (Section 8.1)
6. Self-exclusion (Section 8.2)
7. Deposit limits (Section 9.1)
8. Consumer Advertising and Marketing (Section 11)
9. Training of employees (Section 10)

The Operator commits to appointing a responsible person who fulfils the Responsible Gaming role. Unless/until there is a person dedicated to Responsible Gaming endeavours, the Compliance Officer is responsible for implementing and enforcing this Policy and whoever fulfils the role must provide a report to the Operator's management team at least once every twelve (12) months as to the effectiveness of the Policy and related operational procedure. The report shall provide recommendations for management

as to any proposed operational or policy enhancements. Any material changes to the Responsible Gaming policy will be reported to the CGA.

4. Prevention of underage gambling (effective September 2025)

Age verification

According to Article 1.4(d) of the LOK, it is prohibited to allow a minor the opportunity to participate in Games of Chance.

The Operator undertakes to implement rigorous age verification processes to ensure that all participants are of legal gambling age.

During the account registration process, the Operator obligates to verify that the player is not a minor. This begins with self-attestation, where the player is required to enter their date of birth and confirm they are over 18 by selecting a designated checkbox and additional checks must be carried out to gain sufficient certainty that the individual is not a minor.

If at any point, notwithstanding the checks put in place, the Operator becomes aware that the player is a minor, the account will be closed immediately. The civil law implications of this action must be considered. These may include the obligation to refund all deposits made by the player and the forfeiture of any winnings. The Operator will clearly communicate the reason for the account closure to the minor.

Regardless of the above, proof of age document submission and checks are subject to the Operator's Anti-Money Laundering and Counter-Terrorism Financing (AML/CTF) and Customer due diligence (CDD) policies and should at a minimum include a government-issued valid ID check (such as a passport, national ID, or driver's license) on reaching specified thresholds and in any case prior to first withdrawal.

Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification, may be undertaken by the Operator at its own discretion, but do not supersede the government-issued document requirement.

The Operator will maintain records of all age verification processes and their outcomes. These records will be made available for regulatory review.

5. Player Information and Accessibility (effective May 2025)

5.1. Responsible Gaming Section

At all times the Operator will ensure that a distinct Responsible Gaming Section (the "RG Section") is available for players.

The RG Section will:

- Be clearly identifiable and accessible.
- Contain easily understandable information so that player can make informed choices.
- Include direct access to all relevant tools a player may use to manage their gaming behaviour

including, but not limited to, self-exclusion, cooling-off period, limit setting and other Responsible Gaming measures.

- Display information about how the player may contact the operator regarding any Responsible Gaming concerns via email or chat.
- Be made available in English and the language of the target market. At all times the English version takes precedence if there are discrepancies.

5.2. Homepage Accessibility

- A clear and visible link to the RG Section must be present on the Operators' website or app homepage.
- Display information about how the player may contact the Operator regarding any Responsible Gaming concerns via email or chat.

5.3. Terms & Conditions Inclusion

- The RG Section will be explicitly referenced and included within the Terms & Conditions of the website.
- The Terms and Conditions will be no more than one click away from the homepage of the website.
- Players will be informed about the Responsible Gaming tools available, their functionality, and how they can be used.

5.4. Footer Information Requirements

The footer of the homepage of the gaming website or application will contain the following essential details:

- A clear visual indication that under-age gambling is prohibited.
- The name and registered address of the license holder.
- The official license number issued by the Curacao Gaming Authority.
- A statement confirming the regulatory oversight of the Licensee's operations by the Curacao Gaming Authority.
- A link to the RG Section
- The operators CGA digital seal.
- A direct link to one or more gambling addiction support resources.

6. Self-Assessment (effective March 2026)

Players can access a detailed record of their betting and wagering history including timestamps of transactions from their player account of at least the last six months, without prejudice to retention periods required by other applicable laws and regulations. Longer periods of transactions may be requested from the Operator and must be provided within 10 working days.

Players are encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits by providing self-assessment tools that allow them to answer a series of questions designed to help identify potential problem gambling behaviours. These tools empower players to make informed decisions about their gambling activity.

The 20-question quiz test is available from Gamblers Anonymous published on its website <https://gamblersanonymous.org/20-questions/> .

Also, all players may use the scientifically recognized screening **CAGE Questionnaire** tool.

Players are encouraged to answer the following questions honestly:

C – Cut Down: Have you ever felt you should cut down on your gambling?

A – Annoyed: Have people annoyed you by criticizing your gambling habits?

G – Guilty: Have you ever felt guilty about your gambling?

E – Eye-Opener: Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

Any player who recognizes problematic gambling behaviours through self-assessment should explore the available responsible gambling tools.

7. Behaviour Tracking (effective March 2026)

Article 1.4(e) of the LOK prohibits the Operator from giving a person who can reasonably be assumed to be a vulnerable person the opportunity to play Games of Chance.

By holistically analysing the player's relationship with the Operator, the Operator will try to identify at-risk individuals and take proactive steps to prevent gambling-related harm.

Key monitoring factors are outlined in section 7.1 below, however it is recognised that any single/individual factor shall not necessarily, by itself, classify a player as a potential gambling addict. A determination of problematic gambling behaviour may require the presence of multiple indicators occurring simultaneously and consistently.

Behaviour tracking can be undertaken by frontline staff (such as customer service representatives or VIP managers). In addition to using frontline staff, the Operators is permitted by CGA to use technological tools including but not limited to gaming platform features, in-game tools, artificial intelligence (AI) or machine learning (ML).

7.1 Key monitoring factors

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- A pattern of Inexplicable extended play sessions.
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period.
- Players maxing out a credit card.
- Attempts to open multiple accounts to bypass deposit or loss limits.

7.2. Procedures for Player Identification and Intervention

The Operator will have a structured and documented process for responding to identified indicators of problem gambling. This process must include the following components:

Player Profiling and Risk Assessment

- The Operator will establish and maintain player profiles incorporating relevant data points to assess individual risk levels.
- A risk-based approach will be adopted to determine the appropriate level of monitoring and intervention.
- All Responsible Gaming interactions—whether initiated by the player or the Operator—will be recorded in the Player Account Management (PAM) system, along with the indicators of concern and any actions taken.

Responsible Gaming Interventions

- Players identified as exhibiting at-risk behaviour will be informed of the Responsible Gaming tools available, such as deposit limits, cooling off, and self-exclusion options.
- The Operator will follow a clear escalation protocol where appropriate, which may include:
 - Applying mandatory deposit limits to the player's account.
 - Temporarily suspending the account pending further assessment.
 - Permanently excluding the player in cases of severe or persistent risk.
- Under no circumstances will the Operator use Responsible Gaming measures as a pretext to prevent or delay legitimate player withdrawals.

8. Cooling off and Self-Exclusion

The Operator undertakes to implement and maintain effective processes and tools that empower the

player to manage their own gambling behaviour.

Two key mechanisms must be made available to players at all times via the RG Section of the website or app:

- **Cooling Off** means a short-term, temporary restriction from gambling activities, which the player can customize.
- **Self-Exclusion** means a long-term, irrevocable exclusion from all gambling activities under the Operator's license.

Players must not be guided or influenced toward one option over another. No interference, bonuses, or reassurances may be provided.

Players must be clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable.

A player who voluntarily labels him/herself as a person experiencing problematic gambling behavior and who requests a licensee in writing to be excluded from playing Games of Chance will be so excluded by the Operator for a period of at least **twelve months** as of the date of the request. During the time of exclusion, such a request will be irrevocable.

	Cooling Off	Self-Exclusion
Wagering Prohibited	Player selection – all or by vertical.	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or all Operator brands – as selected	All brands/domains under the Operator's license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None
Antepost bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing messages	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by the Operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. The Operator undertakes to have a plan to fully automate this process in short term.

Reactivation	Automatic	Player initiated
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8.1. Cooling Off (effective March 2026)

The Operator undertakes to offer players the option to activate a cooling-off period, during which they are temporarily restricted from gambling activity.

The options regard:

1. Duration
2. Brand: (includes both the primary and any mirror domains of that brand)
3. Vertical
4. Marketing Opt-Out

The Duration and Marketing Opt-Out categories are mandatory.

- Duration Only: Restriction on all wagering activity for the period selected on the brand where the restriction was initiated.
- Duration, Vertical and Brand: Restrictions as selected, on brands selected, on verticals selected.

The player must select (by tick-box) their preference in each of these categories. Tick-boxes must not be pre-checked.

Duration Options:

- 24 hours
- 7 days
- 1 month
- 3 months

Vertical Options:

- ALL gambling activities
- Restriction on individual product verticals offered by the operator (for example Casino, Fixed Odds Betting, Poker, and other P2P games). Casino may be sub-categorised as All Games or Slots Only.

Brand Options:

- The current brand (website and/or app)
- All of the operator's brand

Marketing options:

- Opt-out.

Actions and Implementation

Timing

The restrictions must take effect **immediately** and be enforced according to the player's selections. The Operator will not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The Operator undertakes to incorporate a verification check for the elected periods of 1 or 3 months for the player to confirm the decision to take a break from gambling during the selected cool-off period, but such checks should be online only and neutrally expressed e.g. "You wish to cool off for one month. Please confirm."

Player Account

- Player funds remain accessible for withdrawal.
- Account remains active but with gambling features disabled.

Marketing and Communications

- Marketing materials must not be sent to players during their Cooling Off period if they have opted out.
- No bonuses, free play, or incentives may be offered during the cooling-off period.

Reactivation and Post-Cooling Off Protocol

- Accounts must be automatically reactivated after the selected Cooling Off period expires.
- No further action is required by the player.

8.2. Self-Exclusion (effective September 2025, Exclusion by the Operator must be functional effective September 2026)

The Operator undertakes to offer players the option to self-exclude from all gambling activities.

1. Duration: the Operator must offer long-term self-exclusion periods of at least 1 year.
2. Brand: All brands/domains operated under the Operator's license.
3. Vertical: All gambling activities
4. Marketing: Automatic opt-out

The player must select (by tick-box) their preference as to the duration of the self-exclusion period, all the other elements are automatic.

Players must be able to initiate and complete the self-exclusion process fully online, without requiring email communication or Operator approval.

Duration Options

- 1 year
- 3 years
- 5 years

- 10 years
- Lifetime

Actions and Implementation

Timing

The restrictions must take effect **immediately** and be enforced according to the player's selections.

Civil law implications must be considered and may entail any wagering that takes place following the self-exclusion request and prior to it being in effect must be voided and funds must be returned to the player.

The Operator will not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The Operator is entitled to implement one verification check to ensure that the player is aware they have chosen to self-exclude and understands the consequences of this decision. The verification is conducted online and is brief and straightforward. The wording will be the following: "You have chosen to self-exclude for [1 year]. Please confirm."

Player Account

- Account is closed. Player can no longer log-in.
- The Operator undertakes to have robust measures in place to identify where reasonably possible duplicate accounts exist and prevent self-excluded individuals from creating new accounts under different credentials.
- The civil law implications must be considered.
- The player must complete any tournaments that is in-running at the time of the self-exclusion.
- Contributions to progressive jackpots that were made by the player through gameplay prior to the self-exclusion request remain in-situ, but the player is no longer entitled to participate with the jackpot after the self-exclusion is in effect.

Marketing and Communications

No direct marketing or advertising can be sent to the player.

Reactivation and Post-Cooling Off Protocol

- After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account. The written request can be prompted at the point of the player attempting to log in after the exclusion period has ended or by unprompted written communication by the player via the official customer support channels. Reactivation cannot be instigated by the Operator re-commencing communications with the player. Activation of a self-exclusion by a player is irreversible and irrevocable for the duration of the exclusion period selected.

- The Operator must retain records of the self-excluded players in accordance with the applicable retention periods. Additionally, where possible, and in line with surrounding regulations, any payment method known directly by the Operator used by a self-excluded player must be blocked for future use during any exclusion period to prevent circumvention of restrictions.

Operator-Initiated Exclusion

The Operator may exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour.
- The player attempts or engages in criminal activities through the Operator's platform.
- Operators may not exclude players solely on the basis of the amount of their winnings.

Operator-initiated exclusions must be formally documented, and records must be kept for at least five years.

9. Limits (effective March 2026)

The Operator undertakes to offer the player with tools to control their gambling activity by setting deposit limits. Players can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

Deposit Limits

Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).

Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.

If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.

Any resolved or unresolved wagers made prior to the deposit limit being set in place remain unaffected regardless of the limits set.

Exceptions to Limits and Exclusions

A limit or exclusion has the potential to affect active wagering – including, but not limited to:

- A time limit set when a player is active in a poker tournament.
- A limit or exclusion when a player has an unresolved ante-post bet on a future event.

In these situations, the restrictions as outlined above must be honoured immediately with the exception of the active gameplay or wager(s). Upon completion of the active gameplay, relevant tournaments, wagers, or events the restrictions apply. Prior to the event's completion, no further wagering is permitted – for example, a player cannot enter another tournament or engage in other gameplay while the current tournament remains in progress, or a player may not place any wagering while an ante-post bet remains unresolved.

10. Training and Staff Readiness (effective March 2026)

The Operator undertakes to train customer service and Responsible Gaming staff to manage player

interactions professionally and effectively.

Training will cover:

- Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation).
- Conducting sensitive and structured conversations with at-risk players.
- Directing players to appropriate support resources and Responsible Gaming tools.

11. Consumer Advertising and Marketing (effective September 2025)

The Operator undertakes not to engage in irresponsible advertising.

- No Targeting of Vulnerable Groups – Marketing including visual content must not directly target Vulnerable People (**effective April 2025**).
- No Portrayal of Gambling as an Investment – Advertising must not promote gambling to achieve financial success or solve financial difficulties.
- No Misrepresentation of Skill vs. Chance – Marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
- No Emotional Manipulation – Advertising must not portray gambling as a substitute for financial, emotional, or mental well-being.
- Marketing materials must not feature minors or depict them engaging with gambling content.
- No Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
- No Encouragement of Unrelated Harmful Behaviours – There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.
- Bonus Conditions:
 - Bonuses and promotions must be communicated transparently with clear terms and conditions.
 - Operators must not use bonuses to encourage excessive gambling.
- Third Party Involvement:
 - The Operator is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors social media influencers, including wordings and visual representations, where the influencers actions and/or statements are paid placement or advertisement.
 - The operator must make any contracted third-party aware of their Responsible Gaming policy and require them to adhere to it.
- Responsible Gaming Messaging – All advertising must include a clearly visible responsible gaming message or slogan.

12. Internet Filtering Tools (effective September 2026)

To further prevent underage gambling, the Operator undertakes to remind adults that they should take precautions when sharing devices with minors - such as safeguarding usernames, passwords, and payment details.

The Operators may employ automatic or manual pop-up notifications in response to concerning behaviours. These notifications will include a link for the player to contact a trained Responsible Gaming professional.

When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the Operator undertakes to initiate direct contact. This communication must advise the player to review the Responsible Gaming area and consider using the available tools and support services.

The Operator is entitled to implement Reality check measures including:

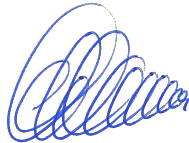
1. A real-time session timer that remains visible at all times while the player is logged in.
2. A real-time clock in the players' time zone.
3. Periodic pop-up reminders or prompts about session duration.
4. Player-Activated Reality Checks.

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

Custom messages may include:

- Clearly indicate how long the player has been playing.
- Display the player's winnings and losses during that period.

In witness whereof, Progress Path Co N.V. has caused this Policy to be duly executed this 15 day of May 2025



By: e-Management N.V. as Director of Progress Path Co N.V.

Policy for safeguarding the responsible offering of Games of Chance_Progress Path Co N.V.

Final Audit Report

2025-05-15

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