

**RESPONSIBLE GAMING POLICY**  
**MIRTH B.V.**

**Registration number: 163936**



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**Stanislav Andrieiev, the**  
MLRO & Compliance  
Officer



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**Jonathan Marshall Ruwel**  
**Heymans** obo Kurason Trust  
Curacao N.V., the Managing  
Director

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## KEY INFORMATION

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|-------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Approving Official(s):</b> | Stanislav Andrieiev, the MLRO & Compliance Officer<br>Jonathan Marshall Ruwel Heymans obo Kurason Trust Curacao N.V., the Managing Director |
| <b>Responsible Office:</b>    | Stanislav Andrieiev, the MLRO & compliance officer                                                                                          |
| <b>Effective Date:</b>        | 22.05.2025                                                                                                                                  |
| <b>Next Review Date:</b>      | 22.05.2026                                                                                                                                  |

## 1. GENERAL PROVISIONS

- 1.1. Our Company is dedicated to creating a safe, transparent, and equitable gaming environment. As part of this commitment, we have integrated Responsible Gaming principles into our business operations to ensure that gambling remains a fun and entertaining activity rather than a source of harm.
- 1.2. Our primary goal is to provide customers with enjoyable and exciting entertainment. We strive to make each gambling experience safe and fair. While the majority of our customers enjoy their time on our platform without issues, a small minority may lose control while gambling.
- 1.3. We encourage all players and customers to gamble responsibly. To support this, we have established this Responsible Gaming Policy (referred to as the Policy).
- 1.4. Our Policy encompasses:
  - 1.4.1. Embedding Responsible Gaming principles into our business model,
  - 1.4.2. Ensuring that gambling stays a pleasurable activity rather than a harmful one,
  - 1.4.3. Implementing proactive measures to protect vulnerable individuals, promote responsible gambling, and prevent or address problem gambling behaviors,
  - 1.4.4. Providing clear and accessible Responsible Gaming guidelines to customers,
  - 1.4.5. Offering tools and informational resources to assist customers in responsible gambling,
  - 1.4.6. Employing monitoring systems to identify and manage problematic gambling patterns,
  - 1.4.7. Ensuring compliance with all regulatory reporting and auditing requirements.
- 1.5. Our Company is required to upload this Responsible Gaming Policy to the CGA portal for evaluation.
- 1.6. Compliance with this Responsible Gaming Policy is mandatory under the LOK; non-compliance will be addressed by the Curacao Gaming Authority (CGA) following its monitoring and enforcement procedures.
- 1.7. Our Company designates our Managing Director and MLRO to oversee Responsible Gaming activities. Any reports or recommendations regarding Policy improvements are obligatory, and significant changes to the Policy must be communicated to the CGA.
- 1.8. This Policy will be maintained alongside our General AML Policy, AML Guide, Privacy & Data Management Policy, KYC Policy, and any other relevant internal regulations issued by the Company from time to time.

## 2. DEFINITIONS AND ABBREVIATIONS

- 2.1. **Company** – means Mirth B.V., a legal entity validly registered and existing under the laws of Curacao, identification number: 163936, address: Schottegatweg Oost 10 Unit A1K 10 Unit 1-9, Bon Bini Business Cente, Curasao.
- 2.2. **GCB** – means Gaming Control Board of Curacao.
- 2.3. **NAF** – means Netherlands Antillean guilder, the currency of Curaçao.
- 2.4. **Gambling or Gambling Game** — means any online game posted on the Website that means playing a game of chance for a Prize. Game of chance includes (i) a game that involves both an element of chance and an element of skill, (ii) a game that involves an element of chance that can be eliminated

by superlative skill, (iii) a game that is presented as involving an element of chance but does not include a sport.

- 2.5. **Customer** — means an individual, who uses the Website and/or familiarizes himself with the provisions of the Website, these Policy and the provisions of other documents, and intends to register on the Website to participate in Gambling (acquire a Player status).
- 2.6. **Third Parties** — means any individuals and/or legal entities other than the User and/or the Player, in particular, but not exclusively: family members, spouses, friends, partners, counterparties, creditors, service providers, agents, etc.
- 2.7. **Vulnerable Persons** — means refers to individuals who may be at a heightened risk of experiencing negative consequences from gambling activities. These individuals may have diminished capacity to make informed decisions or control their gambling behavior due to various factors.
- 2.8. **Website** — means the official websites of the Company, on which Customer may play the Gambling Games.
- 2.9. **RG** — means Responsible Gaming.
- 2.10. In this Policy singular include the plural, and the plural include singular in cases of a need for interpretation.

### 3. **COMPULSIVE GAMBLER**

- 3.1. Gambling is generally a harmless form of entertainment; however, in rare cases, some customers may develop gambling addiction or related disorders. As a result, the Company aims to avoid establishing or maintaining business relationships with customers who exhibit such issues.
- 3.2. Certain signs may suggest that a customer has compulsive gambling tendencies. These include an inability to stop gambling, borrowing money to continue gambling, noticeable personality changes, risking employment or family relationships for gambling purposes.
- 3.3. If a Customer recognizes that they are experiencing any of the problems mentioned above, the Company strongly advises that they cease all gambling activities immediately.
- 3.4. Our Company has implemented a comprehensive internal system to identify compulsive gamblers. This system flags customers who may face financial or mental health risks, or who show signs of distress or aggressive behavior when interacting with the Support Team. All such cases are reviewed individually by our Support Team, which may suggest preventive or recovery measures, such as self-limitation or self-exclusion options.
- 3.5. A compulsive gambler, also known as a person with a gambling addiction or pathological gambler, is an individual who exhibits an uncontrollable urge to gamble despite experiencing negative consequences. This behavior often becomes a significant problem in their personal, financial, and social life.
- 3.6. Compulsive gambling can result in severe financial hardships, damaged relationships, employment issues, and mental health challenges. It may also lead to criminal behavior if individuals resort to illegal acts to sustain their gambling.
- 3.7. Recognizing the signs of compulsive gambling is crucial for seeking help. Various treatment options are available, including counseling, support groups like Gamblers Anonymous, and medical interventions. The goal is to help individuals regain control over their behavior, address underlying issues, and rebuild their lives.

#### **4. MANDATORY REQUIREMENTS**

- 4.1. It is a fundamental principle of our Company that we do not extend credit to customers for the purpose of placing bets or participating in any games available on our website.
- 4.2. Another core principle is the strict prohibition of gambling by individuals who have self-excluded or are minors on the website.
- 4.3. Our marketing and advertising efforts are designed to avoid knowingly and intentionally targeting vulnerable individuals. Additionally, responsible gambling messages are included in all advertisements, which is mandatory.
- 4.4. Our Terms & Conditions are clearly written and accessible, ensuring that all individuals, especially vulnerable persons, can easily understand them.
- 4.5. Our Responsible Gambling policy has been submitted to the CGA for review, and our management team is fully aware of and committed to implementing this policy.
- 4.6. Our Company designates qualified Responsible Gaming personnel to perform relevant tasks within our online operations, specifically assigning this role to our MLRO.
- 4.7. We prominently display information related to responsible gambling and gambling addiction in English and in the languages of our target markets, including notices stating that gambling is not permitted for minors under 18 years of age.
- 4.8. The Company clearly presents information on gambling treatment options, including links to local and/or international support organizations for problem gambling.
- 4.9. Our self-exclusion feature is fully operational and complies with all requirements, offering at least a one-year exclusion period for customers. We also provide safer gambling tools such as deposit limits.
- 4.10. We have systems in place to monitor customer behavior, identify potential issues, and intervene as necessary, ensuring these processes are fully functional.
- 4.11. Staff involved in customer interactions, including support, VIP services, and marketing teams, receive training on responsible gambling practices.
- 4.12. We offer a cooling-off period for customers who choose to take a break from gambling.
- 4.13. Customers are provided with self-assessment tools to evaluate their gambling behavior.
- 4.14. Our Responsible Gambling tools are flexible and can be expanded as needed based on the risk profile, including features like Reality Checks and time limits.

#### **5. MINORS PROTECTION**

- 5.1. Our Company is committed to safeguarding minors from any form of gambling and ensuring that our platform is a safe environment for all users. We strictly prohibit anyone under the age of 18 (or the legal gambling age in the relevant jurisdiction) from participating in any gambling activities on our website.
- 5.2. The Website and its services may be accessed legally only by users who are at least 18 years of age (or other age applicable according to local law). The Customer has to experience all possible ways to discourage attempts by minors to register and play on the Website.

- 5.3. The Company may ask the Customer to prove his/her identity in order to confirm the age. In case the Customer is under the age of 18 (or other age applicable according to local law), the access to the Website's services must be denied.
- 5.4. The Company encourage parents to protect their children from free access to gaming websites. For the purpose of establishing parents control, special software may be installed, the Company recommends parents to check relevant websites for more information.
- 5.5. Our goal is to create a secure environment that prevents minors from accessing gambling services and to promote responsible behavior among all our users. Any violation of these policies will result in immediate action, including account suspension and reporting to relevant authorities if necessary.

## **6. AGE VERIFICATION**

- 6.1. According to Article 1.4(d) of the LOK, it is prohibited for our Company to allow a minor the opportunity to participate in Gambling Games, therefore, our Company implements rigorous age verification processes to ensure that all participants are of legal gambling age.
- 6.2. During the account registration process, we are verifying that the Customer is not a minor. This begins with self-attestation, where the Customer is required to enter their date of birth and confirm they are over 18 by selecting a designated checkbox and our Company implements additional checks to gain sufficient certainty that the individual is not a minor.
- 6.3. If at any point, notwithstanding the checks put in place, our Company becomes aware that the Customer 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 Customer and the forfeiture of any winnings. Our Company will clearly communicate the reason for the account closure to the minor.
- 6.4. Submission and verification of proof of age are conducted in accordance with the CGA's Know Your Customer requirements and our internal AML policies. At a minimum, this involves verifying a valid government-issued ID (such as a passport, national ID, or driver's license) once certain thresholds are met and before any initial withdrawal is made.
- 6.5. Additional verification methods, including electronic verification systems, payment validation, third-party checks, government database searches, or selfie verification, may be used as needed in accordance with our AML/KYC policies. However, these methods do not replace the requirement for official government-issued identification.
- 6.6. Our Company keeps records of all age verification procedures and their results. These records are accessible for review by regulatory authorities.

## **7. RESPONSIBLE GAMING SECTION**

- 7.1. At all times our Company ensures that a distinct Responsible Gaming Section (the "RG Section") is available for Customers and this section shall:
  - 7.1.1. Be clearly identifiable and accessible. Our Website has a clear and visible link to the RG Section.
  - 7.1.2. Contain easily understandable information so that Customer can make informed choices and this information display the topic about how the Customer may contact our experts regarding any Responsible Gaming concerns via email or chat.

- 7.1.3. Include direct access to all relevant tools a Customer may use to manage their gaming behaviour including, but not limited to, self-exclusion, cooling-off period, limit setting and other Responsible Gaming measures.
- 7.1.4. Display information about how the Customer may contact our support staff regarding any Responsible Gaming concerns via email or chat.
- 7.2. The RG Section is available in English and the language of the target market. At all times the English version takes precedence if there are discrepancies.
- 7.3. The footer of the homepage of our Website contains the following essential details:
  - 7.3.1. A clear visual indication that under-age gambling is prohibited.
  - 7.3.2. The name and registered address of the license holder.
  - 7.3.3. The official license number issued by the Curacao Gaming Authority.
  - 7.3.4. A statement confirming the regulatory oversight of the Licensee's operations by the Curacao Gaming Authority.
  - 7.3.5. A link to the RG Section.
  - 7.3.6. The CGA digital seal.
  - 7.3.7. A direct link to one or more gambling addiction support resources such as Gamcare, Gamblers Anonymous, Gambleaware. In addition to international support resources, information and links to local support sites (where available in the target market) can also be provided.

## **8. TRAINING AND STAFF READINESS**

- 8.1. Our Company provides trainings to the customer service staff and Responsible Gaming staff to handle Customers interactions professionally and effectively. Training covers, but not exclusively:
  - 8.1.1. Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation).
  - 8.1.2. Conducting sensitive and structured conversations with at-risk Customers.
  - 8.1.3. Directing Customers to appropriate support resources and Responsible Gaming tools.
- 8.2. Our Company is dedicated to ensuring that all staff members involved in customer interaction are thoroughly trained and equipped to promote responsible gambling practices. To achieve this, we implement comprehensive training programs designed to foster a clear understanding of responsible gaming principles, the identification of signs of gambling-related problems, and appropriate intervention strategies.
  - 8.2.1. Regular Training Programs: All customer support, VIP, marketing, and relevant staff undergo mandatory training sessions covering responsible gambling policies, current best practices, and updates on regulatory requirements. These training sessions are held regularly to maintain awareness and competency.
  - 8.2.2. Specialized Knowledge: Staff are educated on key issues including the risks of gambling addiction, recognizing signs of problem gambling, and understanding the company's tools and procedures for promoting responsible gaming, such as self-exclusion, deposit limits, and customer behavior monitoring.
  - 8.2.3. Customer Support Skills: Employees are trained to communicate responsibly and empathetically with customers, providing guidance and support while maintaining professionalism and confidentiality.

- 8.2.4. Ongoing Education: The Company commits to continuous learning by updating staff on new tools, policies, and relevant research related to responsible gambling. Refresher courses and mandatory updates are implemented periodically.
- 8.2.5. Emergency Response and Intervention: Staff are prepared to identify high-risk behaviors and take appropriate action, including initiating customer interventions, offering support resources, or referring customers to specialized support services.
- 8.2.6. Internal Accountability: Staff members who are responsible for implementing and overseeing responsible gaming measures are held accountable through regular performance assessments, and their efforts are aligned with the Company's commitment to responsible gaming.
- 8.3. By investing in staff training and readiness, we aim to foster a responsible gambling environment that prioritizes customer well-being, supports early detection of issues, and ensures that our staff are fully capable of guiding customers towards safe gaming practices.

## **9. SELF-ASSESSMENT**

- 9.1. Our Customers are able to access a detailed record of their betting and wagering history including timestamps of transactions from their Customer 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 by the Customer and shall be provided within 10 working days.
- 9.2. Our Customers is 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 Customers to make informed decisions about their gambling activity.
- 9.3. One commonly used test is available from Gamblers Anonymous – it is a 20-question quiz that is published on its website <https://gamblersanonymous.org/20-questions/>.
- 9.4. Alternatively, or additionally we could provide our Customers with access to scientifically recognized screening tools, which may include:
  - 9.4.1. The CAGE Questionnaire (Adapted for Gambling). 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.

- 9.5. Our Company recommends that any Customer who recognize problematic gambling behaviours through self-assessment should explore the available responsible gambling tools.

## **10. BEHAVIOUR TRACKING**

- 10.1. Our proactive monitoring system detects indicators of problematic gambling and establishes clear intervention procedures for high-risk customers to reduce potential harm. According to Article 1.4(e) of the LOK, our Company is prohibited from allowing individuals who can reasonably be considered vulnerable to participate in games of chance.
- 10.2. By thoroughly analyzing each customer's overall relationship with our Company, we can identify individuals at risk and take proactive measures to prevent gambling-related harm.
- 10.3. No single factor alone necessarily qualifies a customer as potentially having a gambling problem. Instead, a combination of multiple consistent indicators over time may be required to assess problematic gambling behavior.
- 10.4. Behavioural monitoring is generally carried out by frontline staff such as customer support agents or VIP managers, who are well-positioned to identify warning signs through observation of patterns and direct interactions. A structured process for flagging potential vulnerable gamblers serves as an initial trigger for a more detailed behavioral review, which is integral to our Responsible Gaming practices.
- 10.5. Besides frontline staff, our Company is permitted by the CGA to utilize technological solutions, including platform features, in-game tools, artificial intelligence (AI), or machine learning (ML) algorithms.
- 10.6. Our staff monitors several key factors, including:
- 10.6.1. Sudden or unexplained increases in deposit and wagering activity or session durations.
- 10.6.2. Repeated failed transactions caused by insufficient funds.
- 10.6.3. Multiple cancellations of withdrawal requests.
- 10.6.4. Patterns of unusually long and inexplicable gambling sessions.
- 10.6.5. Excessive communication with customer support, such as requests for bonuses accompanied by signs of agitation.
- 10.6.6. Frequent changes to Responsible Gaming tools, including repeatedly setting or adjusting deposit or loss limits or repeatedly activating cooling-off periods.
- 10.6.7. Customers reaching the maximum credit limit on their credit cards.
- 10.6.8. Attempts to open multiple accounts to circumvent deposit or loss limits.

## **11. PROCEDURES FOR CUSTOMERS IDENTIFICATION AND INTERVENTION**

- 11.1. Our Company develops and documents a structured process for responding to signs of problem gambling. This process comprises the following elements:
- 11.1.1. **Player Profiling and Risk Evaluation:** We create and maintain customer profiles that incorporate relevant data points to evaluate individual risk levels. A risk-based approach is employed to determine the appropriate level of monitoring and intervention. All Responsible Gaming interactions—whether initiated by the customer or our staff—are recorded within the Player Account Management (PAM) system, including any concerning indicators and actions taken.

11.1.2. **Responsible Gaming Interventions:** Customers displaying at-risk behavior are informed about available Responsible Gaming tools, such as deposit limits, cooling-off periods, and self-exclusion options. We follow a defined escalation process when necessary, which may include: imposing mandatory deposit limits on the customer's account, temporarily suspending the account for further assessment, or permanently excluding the customer in cases of severe or ongoing risk. Under no circumstances are Responsible Gaming measures used to block or delay legitimate customer withdrawals.

## 12. COOLING OFF AND SELF-EXCLUSION

12.1. Our Company implements and maintains effective processes and tools that empower the Customer to manage their own gambling behaviour. Two key mechanisms must be made available to Customers at all times via the RG Section of the Website

12.1.1. Cooling Off: A short-term, temporary restriction from gambling activities, which the Customer can customize.

12.1.2. Self-Exclusion: A long-term, irrevocable exclusion from all gambling activities under our license.

12.2. Customers shall not be guided or influenced toward one option over another. No interference, bonuses, or reassurances may be provided. Customers 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.

12.3. **Cooling-off period.** Our Company offers to our Customers the option to activate a cooling-off period, during which they are temporarily restricted from gambling activity. The options regard:

(I) Duration

(II) Brand: (includes both the primary and any mirror domains of that brand)

(III) Vertical gaming

(IV) Marketing Opt-Out.

Our Customer shall select (by tick-box) their preference in each of these categories. Tick-boxes is not pre-checked. Duration options are:

(I) 24 hours

(II) 7 days

(III) 1 month

(IV) 3 months.

Vertical Options are

(I) ALL gambling activity

(II) Restriction on individual product verticals offered by our Company (for example Casino, Fixed Odds Betting, and other P2P games).

Our Company may be sub-categorised as All Games or Slots Only. The restrictions must take effect immediately and be enforced according to the Customer's selections. Please note, that our Company will not: (I) Question the Customer's decision,

(II) Offer bonuses or promotions to encourage the Customer to continue playing,

(III) Delay or complicate the activation process.

During the cooling-off period:

(I) Customer funds remain accessible for withdrawal,

(II) account remains active but with gambling features disabled,

(III) Marketing materials will not be sent to customers during their Cooling Off period if they have opted out, and

(IV) no bonuses, free play, or incentives may be offered during the cooling-off period.

After cooling-off period ends:

(I) Accounts must be automatically reactivated after the selected Cooling Off period expires, and

(II) No further action is required by the Customer.

12.4. **Self-Exclusion.** Our Company offers to our Customers the option to self-exclude from all gambling activity. Duration: In accordance with LOK clause 5.4., our Company offers a long-term self-exclusion period of at least 1 year, other options may be switched by our Company, such as 3, 5, 10 years or Lifetime.

Brand: All brands/domains operated under our license. Vertical: All gambling activity Marketing: Automatic opt-out. Our Customer must select (by tick-box) their preference as to the duration of the self-exclusion period, all the other elements are automatic.

With regard to the self-exclusion process(s) offered by our Company, at the very least the Customer is able to initiate and complete the self-exclusion process fully online, without requiring email communication or our approval. The restrictions will affect immediately and be enforced according to the Customer's selections. The civil law implications must be considered and may entail that 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 Customer. Please note, that our Company will not:

(I) Question the Customer's decision,

(II) Offer bonuses or promotions to encourage the Customer to continue playing

(III) Delay or complicate the activation process.

During Self – Exclusion option, Customer's Account will be closed. Our Company will use 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. These may include that any ante-post bets must be voided and refunded, subject to AML/CFT regulations. The Customer must complete any tournaments (for example poker tournament) that is in-running at the time of the self-exclusion. Contributions to progressive jackpots that were made by the Customer through gameplay prior to the self-exclusion request remain in-situ, but the Customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect. No direct marketing or advertising can be sent to the Customer.

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

of the exclusion period selected. Our Company will retain records of self-excluded in accordance with the applicable retention periods. Additionally, where possible, and in line with surrounding regulations, any payment method known directly by our Company used by a self-excluded Customer shall be blocked for future use during any exclusion period to prevent circumvention of restrictions.

**12.6. Company Initiated Exclusion.** Our Company may exclude a Customer as a high-risk intervention measure if:

(I) the Customer displays problematic gambling behaviour,

(II) The Customer attempts or engages in criminal activities through the platform.

Our Company may not exclude Customers solely on the basis of the amount of their winnings. Company-initiated exclusions will be formally documented, and records must be kept for at least five years. The CGA may request these records at any time and our Company will provide these records.

### **13. LIMITS**

**13.1.** Our Company offers to our Customers a specific tools to control their gambling activity by setting deposit limits. Customers can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits. Customers can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly):

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

**13.1.2.** 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.

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

**13.2.** Exceptions to Limits and Exclusions. A limit or exclusion has the potential to affect active wagering – including, but not limited to:

**13.2.1.** A time limit set when a Customer is active in a poker or other similar tournament.

**13.2.2.** A limit or exclusion when a Customer has an unresolved ante-poste bet on a future event.

**13.3.** In these situations, the restrictions as outlined above must be honored 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 Customer cannot enter another tournament or engage in other gameplay while the current tournament remains in progress, or a Customer may not place any wagering while an ante-post bet remains unresolved.

### **14. CONSUMER ADVERTISING AND MARKETING**

**14.1.** Our Company will not be engaged in irresponsible advertising, that means:

**14.1.1.** No Targeting of Vulnerable Groups – Marketing including visual content must not directly target Vulnerable People.

**14.1.2.** No Portrayal of Gambling as an Investment – Advertising must not promote gambling as a way to

achieve financial success or solve financial difficulties.

- 14.1.3. No Misrepresentation of Skill vs. Chance – Marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
- 14.1.4. No Emotional Manipulation – Advertising must not portray gambling as a substitute for financial, emotional, or mental well-being.
- 14.1.5. Marketing materials must not feature minors or depict them engaging with gambling content.
- 14.1.6. No Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
- 14.1.7. No Encouragement of Unrelated Harmful Behaviours – There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.
- 14.2. Bonus Conditions:
  - 14.2.1. Bonuses and promotions must be communicated transparently with clear terms and conditions.
  - 14.2.2. Our Company must not use bonuses to encourage excessive gambling.
- 14.3. Third Party Involvement:
  - 14.3.1. Our Company is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors social media influencers, including wordings and visual representations, where the influencers actions and/or statement are paid placement or advertisement.
  - 14.3.2. Our Company takes any contracted third-party aware of their Responsible Gaming policy and require them to adhere to it.
  - 14.3.3. All advertising must include a clearly visible responsible gaming message or slogan.

## **15. ENHANCED RESPONSIBLE GAMBLING MEASURES**

- 15.1. Based on higher levels of risk in its business model, our Company may decide to implement enhanced measures regarding responsible gambling. Higher levels of risk may be due to the business model being inherently high risk or because of a disproportionately high number of Customers being assessed to be at risk either due to our Company checks or the numbers of Customers choosing to exclude/cool-off.
- 15.2. **Internet filtering tools.** To further prevent underage gambling, Our Company is advised to remind adults that they should take precautions when sharing devices with minors - such as safeguarding usernames, passwords, and payment details. Additionally, our Company may consider links to third-party software that can help restrict access to gambling websites. While there are myriad options available globally, the following third-party tools (some paid, some free) are examples that are available for website blocking and gambling site blocking in particular: BetBlocker – [betblocker.org](https://betblocker.org) GamBlock – [gamblock.com](https://gamblock.com) Gamban – [gamban.com](https://gamban.com).
- 15.3. **Direct Customer Interaction.** Our Company may employ automatic or manual pop-up notifications in response to concerning behaviours. These notifications must include a link for the Customer to contact a trained Responsible Gaming professional. When a Customer exhibits behaviour that reasonably suggests they may be a Vulnerable Player, our Company must initiate direct contact. This communication must advise the Customer to review the Responsible Gaming area and consider using the available tools and support services.

- 15.4. In line with our target Customer and/or market, other limits may be considered by our Company, including loss limits, time limits or wager limits.
- 15.5. **Reality Check.** Reality check measures are varied, and if used, our Company can implement these measures without compromising the user experience. However, if used they must be fit-for-purpose and measures include, but are not limited to:
- 15.5.1. A real-time session timer that remains visible at all times while the Customer is logged in.
- 15.5.2. A real-time clock in the Customers time zone.
- 15.5.3. Periodic pop-up reminders or prompts about session duration.
- 15.5.4. Customer-Activated Reality Checks.
- 15.6. Customers may have the option to set customized reality check alerts at specific time intervals. When triggered, it requires the Customer to confirm that they have read the message before resuming play and offers the option to end the session or continue playing. Customized Reality Checks must suspend play momentarily and require the Customer to confirm they have read the message before resuming play. Custom messages may include (I) Clearly indicate how long the Customer has been playing, and (II) Display the Customer's winnings and losses during that period.

## 16. CONTACT INFORMATION

- 16.1. For any questions regarding this policy, please contact: support@auro777.win or send a mail on the address: Schottegatweg Oost 10 Unit A1K 10 Unit 1-9, Bon Bini Business Center, Curaçao.

## 17. POLICY HISTORY

|                   |                                                  |
|-------------------|--------------------------------------------------|
| May 22, 2025      | Responsible Gaming Policy update (Annual update) |
| December 02, 2024 | Responsible Gaming Policy update (legal changes) |
| July 25, 2024     | Responsible Gaming Policy update (legal changes) |
| March 14, 2024    | Responsible Gaming Policy update (Annual update) |
| November 22, 2023 | Responsible Gaming Policy update (legal changes) |
| July 20, 2023     | Responsible Gaming Policy update (legal changes) |
| May 24, 2023      | Initial Responsible Gaming Policy                |