

Responsible Gaming Policy

1. Purpose and Commitment

This Responsible Gaming Policy sets out the measures implemented by the Windward Circle B.V. (henceforth “The Operator”) with offices at Emancipatie blvd Dominicio Don Martina 31, Willemstad, Curacao. CGA License OGL/2024/1135/0484 to ensure gambling remains a form of entertainment and does not cause harm to players or other persons. The Operator is committed to providing a safe, transparent, and responsible gaming environment in accordance with the National Ordinance on Games of Chance (LOK) and the requirements of the Curaçao Gaming Authority (CGA).

The Operator adopts a proactive, risk-based approach to identifying and mitigating gambling-related harm, with particular focus on the protection of vulnerable persons and the prevention of underage gambling.

2. Scope

This policy applies to all online gaming activities offered under the Operator’s CGA licence and to all employees, contractors, affiliates, and third parties acting on behalf of the Operator.

3. Definitions

Key terms used in this policy (including but not limited to *Minor*, *Vulnerable Person*, *Cooling Off*, and *Self-Exclusion*) are interpreted in line with the LOK and CGA Responsible Gaming Policy for Licensed Operators.

4. Responsible Gaming Governance

4.1 Responsible Gaming Function

The Operator appoints Mariam Gegetchkori, Senior Compliance Officer, for the implementation, oversight, and enforcement of this Responsible Gaming Policy (the “Responsible Gaming Officer”).

4.2 Management Oversight

- Senior management is informed of this policy and its implementation.
- The Responsible Gaming Officer provides a written effectiveness report to

- management at least once every twelve (12) months.
- Material changes to this policy are reported to the CGA.
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5. Prevention of Underage Gambling

5.1 Age Verification

Gambling by minors (persons under 18 years of age) is strictly prohibited.

The Operator implements robust age verification controls including:

- Mandatory date-of-birth entry and self-attestation during registration.
- Confirmation that the player is at least 18 years of age via an affirmative checkbox.
- Verification call after first deposit
- Government-issued photo identification verification prior to first withdrawal and/or upon reaching defined behavioral risk or the 3 transaction thresholds.
- Ongoing monitoring for indicators of underage play.

If a player is identified as a minor:

- The account is closed immediately.
 - Deposits may be refunded in accordance with civil law obligations.
 - Any winnings may be forfeited.
 - Records are retained and made available to the CGA upon request.
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6. Player Information and Accessibility

6.1 Responsible Gaming Section

A dedicated Responsible Gaming (“RG”) section is available at all times and:

- Is clearly identifiable and accessible from the cashier section.
- Is available in English, French, Italian, Spanish, German and portuguese
- Explains gambling risks and responsible play principles.
- Advises how to prevent compulsive gambling and how to seek help.
- Provides access to reputable third party Responsible Gaming tools.
- Displays support@purecasino.co for Responsible Gaming support and account limits

6.2 Terms and Conditions

- The Responsible Gaming Policy is referenced in the Terms & Conditions.
- Terms & Conditions are accessible within one click from the homepage.

6.3 Footer Disclosures

The website footer includes:

- An underage gambling warning (18+).
 - Operator name, registered address
 - Confirmation of CGA regulatory oversight with Logo.
 - The CGA digital seal.
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7. Player Self-Assessment

Players have continuous access to their betting and transaction history for at least six (6) months.

The Operator provides self-assessment tools designed to help players evaluate their gambling behaviour, including:

- Access to questionnaires via Gamblers Anonymous 20 Questions and gamblingtherapy.
 - Guidance on Preventing compulsive gambling..
 - Clear recommendations to use Responsible Gaming tools when risk indicators are identified under the Seek Help section
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8. Behaviour Tracking and Monitoring

8.1 Monitoring Approach

The Customer Service account management and risk assessment teams actively monitors player behaviour to identify potential gambling-related harm using a combination of:

- Transactional and behavioural data.
- Customer support interactions.
- Manual and automated monitoring tools.

Key indicators may include (non-exhaustive):

- Sudden increases in deposits or wagering.
- Repeated failed payment attempts.
- Frequent withdrawal reversals.
- Extended or erratic play sessions.
- Repeated limit changes or cooling-off requests.
- Attempts to bypass controls or create multiple accounts.

8.2 Player Profiling and Risk Assessment

- Player profiles are maintained to assess individual risk levels.
- A risk-based escalation framework is applied.
- All Responsible Gaming interactions and actions are documented in the Player Account Management system, in the comments section.

8.3 Interventions

Where risk indicators are identified, the Operator may:

- Provide responsible gambling information and tools.
- Apply mandatory limits.
- Temporarily suspend the account.
- Initiate operator-led exclusion in severe cases.

Responsible Gaming measures are never used to delay or prevent legitimate withdrawals.

9. Cooling-Off and Self-Exclusion

9.1 Cooling-Off

Players may voluntarily restrict their gambling for a temporary period.

Minimum features include:

- Duration options: 24 hours, 7 days, 1 month, 6 months and 1 year. Custom period may also be applied by contacting support.
- Immediate enforcement.
- No wagering or deposits during the selected period.
- Optional marketing opt-out.

Cooling-off selections are self-executed online without pre-selected options or undue influence.

Accounts automatically reactivate at the end of the cooling-off period.

9.2 Self-Exclusion

Self-exclusion provides long-term, irrevocable exclusion from all gambling activity. The Operator will confirm this choice by contacting the player.

- Available durations: lifetime
- Immediate enforcement.
- Automatic marketing opt-out.

Self-exclusion can be initiated fully online via the cashier and does not require operator approval.

Reactivation is only possible after expiry and must be requested in writing by the player.

9.3 Operator-Initiated Exclusion

The Operator may exclude players where:

- Gambling behaviour indicates significant risk.
- Criminal or fraudulent activity is suspected.

Operator-initiated exclusions are documented and retained for at least five (5) years.

10. Limits

10.1 Deposit Limits

Players can set daily, weekly, or monthly deposit limits by contacting support.

- Increases to restriction severity take effect immediately.
 - Decreases are subject to a 24-hour review period.
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11. Training and Staff Readiness

Relevant staff (including customer support, VIP, and marketing teams) receive Responsible Gaming training and review every 6 months covering:

1. Identification of Gambling Distress

Staff must be trained to recognize both behavioral and financial "red flags" that indicate a player's gambling is no longer for entertainment.

Emotional & Behavioral Indicators:

Distress & Mood Swings: Frequent swearing, crying, or expressions of extreme frustration after losses.

Social Isolation: Players asking staff to lie about their presence to family or friends.

Obsession: Constant talk of "luck," specific items/machines being "due" (Gambler's Fallacy), or staying from opening until closing.

Financial Indicators:

Chasing Losses: Increasing bet sizes significantly or returning immediately after a loss to "get even".

Fund Depletion: Attempting to use credit cards, asking for credit from staff, or mentioning that they are using money meant for rent/bills.

Transaction Velocity: (Specific to Risk) Rapid, repeated deposits within a short timeframe.

2. Communication & Immediate Measures

Effective communication requires empathy and non-judgmental language to encourage a break without causing further distress.

Communication Protocols:

The "Check-In": Approach the player with a simple, empathetic question: "Are you okay? I've noticed you've been here a while and seem frustrated".

Neutral Language: Use positive messaging like "keep it a game" and avoid accusatory language that induces guilt.

De-escalation: If a player is aggressive, remain calm, provide clear information on their current spend if requested, and suggest taking a break for fresh air.

Immediate Measures:

Cooling Off: Suggest a 24-hour "time-out" or cooling-off period.

Stop-Play Recommendation: If distress is evident, explicitly suggest they consider stopping for the day.

3. Escalation Procedures

1. CS or VIP hosts suggest limits or temporary breaks.
2. Risk/Compliance teams perform "Enhanced Due Diligence" (EDD) or Source of Wealth (SoW) checks on high depositors.
3. If a player shows high risk (e.g., suicidal ideation or extreme financial ruin), management must be alerted immediately to consider a mandatory account suspension.
4. Referral to Support Organisations. Staff should never act as counselors but must provide clear pathways to professional help.

12. Advertising and Marketing

The Operator ensures all marketing and advertising is responsible and compliant.

Campaigns are reviewed and approved by the marketing manager in accordance with the prohibited practices guidelines.

Prohibited practices include:

- Targeting vulnerable persons or minors.
- Presenting gambling as a financial solution or investment.
- Misrepresenting chance-based games as skill-based.
- Emotional manipulation or association with harmful behaviours.

All advertising includes a visible Responsible Gaming message at the footer.

Affiliates and third parties are contractually required to comply with this policy.

13. Enhanced Responsible Gaming Measures

Where higher risk is identified, the Operator may implement additional controls such as:

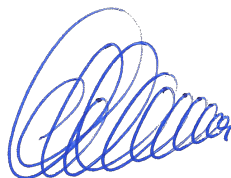
- Reality checks and session timers.
 - Time, loss, or wager limits.
 - Direct player communications.
 - Links to internet filtering and blocking tools.
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14. Review and Updates

This Responsible Gaming Policy is reviewed periodically and updated as required to ensure ongoing compliance with regulatory expectations and industry best practices.



e-Management N.V.
Managing Director



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Final Audit Report

2026-02-05

Created:	2026-02-04
By:	Bryon Finies (bryon.finies@hbmgroup.com)
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