

## RESPONSIBLE GAMBLING POLICY

Version 1.0.

### 1. Introduction and Purpose

This Responsible Gaming Policy (“**Policy**”) is adopted at the Medial N.V (the “**Operator**”) level in accordance with the requirements of the Curaçao Gaming Authority (CGA) under the National Ordinance on Games of Chance (LOK).

The Operator recognizes its duty to provide a safe, transparent, and fair gaming environment.

Gambling must remain an enjoyable form of entertainment. At the same time, the Operator accepts responsibility to prevent harm by identifying and protecting Vulnerable Persons, mitigating problem gambling, and ensuring compliance with regulatory obligations.

This Policy establishes the Operator’s governance framework for Responsible Gaming (RG), applicable to all brands, platforms, and domains operating under its license.

### 2. Scope

This Policy applies to:

- All brands and domains operated under the Operator’s B2C license.
- All employees, contractors, and affiliates engaged in gaming operations.

The Policy is not limited to individual brand implementations but instead sets minimum standards that each brand must comply with.

### 3. Definitions

Key terms used in this Policy are defined in line with CGA standards:

- Operator – Holder of a B2C license from the CGA (or Orange Digital Seal certificate).
- Vulnerable Person – As defined under LOK, including: (i) minors under 18, (ii) individuals without control over their gambling behaviour, (iii) self-excluded persons, or (iv) bankrupt individuals.
- Responsible Gaming (RG) – A set of principles, tools, and procedures designed to ensure gambling is fair, transparent, and does not cause harm.
- Cooling Off – A voluntary short-term break from gambling, ranging from 24 hours to 3 months.
- Self-Exclusion – A voluntary long-term or permanent exclusion from all gambling activities under the Operator’s license.

### 4. Policy Objectives

The Operator commits to:

1. Prevent underage gambling.
2. Provide transparent and accessible RG tools to all players.
3. Monitor player behaviour to detect risks.

4. Implement mandatory intervention protocols.
5. Train staff to recognize and respond to problematic behaviour.
6. Ensure all advertising is socially responsible and does not target Vulnerable Persons.
7. Meet all reporting and audit requirements set by the CGA.

## **5. Mandatory Requirements**

The Operator shall implement the following measures across all brands

1. Age Verification – No access to minors; KYC and government ID checks required.
2. Responsible Gaming Information – Prominently available in English and target market languages.
3. Self-Assessment Tools – Players must have access to self-tests and betting history.
4. Behaviour Tracking – Monitoring for signs of problem gambling, with intervention protocols.
5. Cooling-Off Options – Short-term voluntary suspension tools (24h, 7d, 1m, 3m).
6. Self-Exclusion – Long-term exclusion options (1 year, 3 years, 5 years, 10 years, lifetime).
7. Deposit Limits – Daily, weekly, and monthly deposit limits must be available.
8. Advertising Standards – RG messaging mandatory; no targeting Vulnerable Persons.
9. Staff Training – Customer-facing and compliance staff must be RG-trained annually.

## **6. Prevention of Underage Gambling**

- Strict KYC and age verification at registration.
- No account activation or withdrawals permitted before ID verification.
- Minors identified on the platform will have accounts closed, deposits refunded, and winnings forfeited.
- Public education campaigns and parental control resources will be promoted.

## **7. Player Protection Tools**

1. Deposit Limits – Players may set daily, weekly, or monthly deposit caps.
2. Wagering Limits – Operators may provide optional wager/spend limits.
3. Cooling-Off Periods – Player-selected temporary suspensions.
4. Self-Exclusion – Irrevocable exclusion across all brands for chosen duration.
5. Reality Checks – Optional reminders of time and money spent during sessions.
6. Access to Betting History – Minimum six-month history must be available on demand.

## **8. Behaviour Monitoring and Intervention**

- Monitoring factors include: excessive deposits, withdrawal reversals, failed payments, extended play sessions, multiple account attempts, and erratic use of RG tools
- Identified high-risk players must be contacted, informed of RG tools, and may be subject to mandatory limits or account suspension.

- All interventions are logged in the Player Account Management (PAM) system.
- No intervention may be misused to delay legitimate withdrawals.

## **9. Exclusion Mechanisms**

- Player-Initiated Cooling Off or Self-Exclusion – Fully online, immediate, and irrevocable for the chosen duration.
- Operator-Initiated Exclusion – The Operator may exclude players showing severe risk indicators or criminal behaviour.

## **10. Marketing and Advertising**

- No advertising directed at minors or Vulnerable Persons.
- No portrayal of gambling as an investment, financial solution, or means of success.
- Clear display of bonus terms and conditions.
- Mandatory RG messages on all marketing materials.
- Affiliates and third-party partners must adhere to this Policy.

## **11. Training and Governance**

- All customer-facing staff must receive RG training, including identifying problematic behaviour and handling sensitive interactions.
- The Operator will appoint a Responsible Gaming Officer (separate from AML/CFT) responsible for:
  - Annual reporting to management on RG effectiveness.
  - Submitting policy updates to the CGA.
  - Coordinating staff training.

## **12. Continuous Improvement**

The Operator commits to ongoing evaluation of this Policy. Updates will be submitted to the CGA and communicated across all brands. The Operator will consider enhanced measures (e.g., AI-driven behavioural analysis, stronger limits, or mandatory reality checks) where risk profiles indicate a need.