

RESPONSIBLE GAMBLING POLICY

Version 1.2.

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. Civil-Law Obligations for Excluded or Underage Players

If a self-excluded player, cooling-off player, or minor accesses the platform in violation of their exclusion status:

- All wagers placed after the exclusion request are void.
- Deposited funds must be refunded to the player within two business days.
- Winnings are forfeited in accordance with civil-law requirements.
- The Player Account is immediately suspended and reviewed.

A report detailing the incident must be submitted to the CGA within five (5) working days, including corrective measures implemented to prevent reoccurrence.

7. No Credit for Gambling

The Operator does not provide credit to players under any circumstances. Customers are strictly prohibited from gambling with funds that have not been deposited into their account from their own verified payment method.

8. Responsible Gaming Display Standards

The Operator shall ensure that Responsible Gaming information is clearly displayed on every brand and domain operating under its licence.

Each brand must include:

1. A dedicated Responsible Gaming page accessible from all pages of the website.
2. Prominent footer elements including:
3. 18+ symbol
4. Curaçao Gaming Authority digital seal
5. Operator licence number
6. Link to this Responsible Gaming Policy
7. Link to professional gambling-support organisations
8. Mandatory Responsible Gaming slogans, displayed consistently across the website and in communications.
9. A clear “No Under 18s” notice on the homepage and registration page.

All Responsible Gaming materials must be made available in English and in any other language required for the Operator’s target markets.

9. 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.

10. Player Protection Tools

1. **Deposit Limits** – Players may set daily, weekly, or monthly deposit caps. Requests to reduce deposit limits take effect immediately.

Requests to increase deposit limits are subject to a mandatory cooling-off period of at least twenty-four (24) hours, after which the increase takes effect only after affirmative reconfirmation by the player.

Players will be notified when reaching 80% of their active limit.

2. **Wagering Limits** – The Operator may provide optional wager/spend limits.

3. **Cooling-Off Periods** – A cooling-off period is a temporary break from gambling that allows a player to pause their activity and regain control and is available to all customers across all brands and products operated under the licence. Cooling-off must be initiated directly by the player through their account interface, without staff intervention.

Once selected and confirmed, the cooling-off period takes immediate effect.

The player is logged out of their account and cannot log in until the chosen period has expired.

During cooling-off:

1. No deposits, wagers, withdrawals, or gameplay can be performed.
2. Players cannot reverse or shorten the CO period once activated.
3. Marketing communications and promotional materials are paused.

Account access is automatically restored once the cooling-off period concludes. No proactive contact shall be made by the Operator to encourage gambling activity. The player is notified upon expiry that their account has been re-enabled.

4. **Self-Exclusion** – Self-exclusion is a mandatory Responsible Gaming measure for customers who recognise that they may be experiencing gambling-related harm. Self-exclusion is designed to prevent all gambling activity for a long-term period and must be respected by both the player and the Operator. During the selected period the exclusion is irrevocable and becomes effective immediately upon confirmation.

Players may activate self-exclusion:

1. Directly from their player account; or
2. By contacting customer support (where the operator will guide them to complete the exclusion through their account).

Self-exclusion must always be completed online by the player, as it is a voluntary measure requiring explicit confirmation.

Once self-excluded:

1. The account is closed and login is disabled immediately.
2. All brands, domains, apps, and verticals operated under the licence are included.
3. All marketing communications are terminated and the player is removed from all CRM channels within a maximum of 72 hours.
4. All pending wagers scheduled to take place after the request are cancelled and funds refunded.
5. No further bonuses, rewards, free bets, or incentives may be offered.
6. The player cannot deposit, withdraw, wager, or access any gaming content.

Any bets placed after a self-exclusion request are void. Deposited funds are refunded. Winnings are forfeited.

Reactivation is not automatic and not permitted during a self-exclusion period. After the selected self-exclusion period ends the player must submit a written request (email or chat). The Operator

performs a risk review and may request confirmation documents. The account is only reactivated after this confirmation.

5. **Reality Checks** – Optional reminders of time and money spent during sessions. Players may enable reality check reminders to receive notifications at regular intervals about:

1. Time spent during the gaming session;
2. Total stake;
3. Net results.

Reality checks remain available across all brands and may be customised or deactivated by players at any time unless the Operator mandates them for high-risk profiles

6. **Access to Betting History** – Minimum six-month history must be available on demand.

11. 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.

12.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.

13. 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.

14.Recordkeeping and Data Management

The Operator retains Responsible Gaming records in accordance with regulatory expectations.

Records must include:

1. Self-exclusion and cooling-off logs;
2. Player intervention records and correspondence;
3. Behavioural monitoring flags;
4. Risk assessments and account reviews;
5. Staff training logs;
6. Marketing opt-out records for excluded players.

All Responsible Gaming-related records are preserved for a minimum of five (5) years and are made available to the CGA upon request.

15. 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.
 - Prepare an annual Responsible Gaming Report for senior management and the CGA no later than three (3) months after the end of each calendar year.

16. Regulatory Reporting and Policy Submission

- The Responsible Gaming Officer ensures that this Policy remains compliant with the National Ordinance on Games of Chance (LOK) and the CGA Responsible Gaming Policy.
- The Operator shall:
 - Submit this Responsible Gaming Policy, and any material amendments, to the CGA through the Licensee Portal.
 - Conduct an annual evaluation of Responsible Gaming controls, including intervention outcomes, behavioural monitoring effectiveness, and staff training results.
 - Maintain internal documentation demonstrating implementation of all mandatory Responsible Gaming measures across all brands operating under the licence.

17. 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.