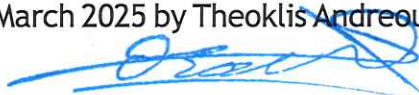


Responsible Gaming Policy of Encode Digital B.V

Version: 2025/V.1

Approval Date: March 2025 by Theoklis Andreou , Director

Signature:

A handwritten signature in blue ink, appearing to be 'Theoklis Andreou', written over a horizontal line.

Policy Overview

Encode Digital B.V. (Registration number 158289) is committed to delivering a secure, transparent, and ethically responsible gaming platform. Company is registered at 10, Schottegatweg Oost, Unit 1-9, Bon Bini Business Center, Curacao on 16/08/2021.

This Responsible Gaming Policy serves as a comprehensive guide to our practices, providing a framework to prevent gambling-related harm, support at-risk players, and promote a healthy balance between gaming and personal well-being.

Core Principles of Responsible Gaming

- Promote player protection and welfare through robust tools and support systems.
- Prevent access to gambling services by minors and vulnerable individuals.
- Encourage self-awareness and self-regulation through personalized gaming limits.
- Support transparency, integrity, and player trust by educating users and staff.

Accessible Information for Players

We believe that informed players make safer choices. Therefore, we ensure that:

- Responsible gaming content is easily accessible across the platform.
- All policies are clearly written and available in multiple languages.
- Key tools such as limits and exclusions are user-friendly and easily located.

Our platform continuously evolves to adapt to player needs and emerging industry standards.

Tools to Empower Players

Self-Exclusion

Players may voluntarily block themselves from accessing gaming services for specific or indefinite periods. Once a self-exclusion request is submitted, access is restricted immediately. Excluded players are also removed from marketing communications.

Cooling-Off Period

A temporary break ranging from 24 hours to 3 months allows users to step back from gambling. No deposits, wagers, or promotional offers are allowed during this period.

Deposit and Spending Limits

Users can manage their financial exposure by setting daily, weekly, or monthly deposit limits. Decrease requests are applied immediately, while increase requests require a mandatory waiting period to ensure thoughtful decision-making.

External Support and Assistance

To ensure that those who may be affected by gambling problems can seek help, we provide links and access to certified counseling services and support networks, such as:

- GamCare
- Gambling Therapy
- National Problem Gambling Helpline

These services offer 24/7 assistance, professional counseling, and self-help resources.

Age Verification Protocols

To protect minors, we enforce a strict age verification process:

- Users must confirm they are over 18 before account registration.
- In certain cases ID verification and payment method validation might apply. Identity Verification is to be conducted if the KYC or AML milestones are being reached by the player and includes ID submission. When applicable, we may also ask for payment method validation and the submission of KYC documentation.
- Underage accounts are immediately closed; all deposits are refunded unless regulatory holds apply, and winnings are voided.

We also advise guardians to use third-party parental control tools such as Net Nanny, GamBlock, or CyberSitter to block access to gaming content.

Self-Assessment and Insight Tools

Players can regularly monitor their gaming habits via:

- Account history and transaction logs.
- Interactive questionnaires that assess the risk of problem gambling.

All data is securely logged to maintain accountability and compliance with regulatory requirements.

Staff Training and Awareness Programs

Our employees are equipped with the skills to recognize and address problem gambling:

- Annual mandatory training with ongoing refresher courses.
- Updates on evolving industry standards and regulations.
- Performance evaluations based on support effectiveness and knowledge retention.

Trained personnel serve as the first line of defense in preventing gambling-related harm.

Escalation and Support for At-Risk Players

When indicators of compulsive or high-risk behavior are detected, our Responsible Gaming or Compliance Officers initiate a structured response:

- Adjust betting and deposit limits.
- Suggest or enforce cooling-off periods or self-exclusion.
- Refer players to external support networks.
- Monitor behavior post-intervention to ensure long-term effectiveness.

Cooling-Off Period Protocol

The cooling-off feature is:

- Easy to activate via the account dashboard.
- Supported with immediate restrictions on play and deposits.
- Accompanied by opt-outs from marketing and bonus communications.

We never interfere with or question a player's choice to take a break. No incentives are provided to influence their decision.

Structured Self-Exclusion Program

Our self-exclusion system enables users to restrict their access for durations including:

- 1 Year
- 3 Years
- 5 Years
- 10 Years
- Lifetime

Key components include:

- Instant activation and enforcement.
- Automatic blocking of saved payment methods.
- Maintenance of a Self-Exclusion Register for seven years.
- Access to professional help and continued support post-exclusion.

Account Reactivation Process

Once a self-exclusion period ends, players must:

- Submit a written request for reactivation.
- Complete a responsible gaming questionnaire.
- Review tools and limits before account access is restored.

Reactivations are never automatic and require approval to ensure player readiness.

Marketing and Advertising Ethics

We maintain high ethical standards in all promotional activity:

- No targeting of minors, self-excluded users, or vulnerable individuals.
- No portrayal of gambling as a financial solution or emotional escape.
- No use of misleading or emotionally manipulative content.
- Affiliates and influencers must comply with our marketing policy.

Players in exclusion or cooling-off periods will not receive any promotional content.

Compliance, Auditing, and Reporting

All activities related to responsible gaming are:

- Monitored in real time for suspicious behavior.
- Logged and stored securely for auditing.
- Reported to the Gaming Authority within five business days in case of violations (e.g., underage access or self-exclusion breaches).

Our internal systems ensure accountability and regulatory compliance at every level.

Operator-Initiated Exclusion

Encode Digital B.V. may restrict player access proactively when:

- Evidence of problem gambling is present.
- Suspicious, criminal, or unethical activity is detected.

Each case is documented and reviewed periodically, with records retained for at least five years.

Customizable Player Limits

Players can adjust their deposit, wager, and session duration settings. Changes include:

- Instant application for reduced limits.
- Delayed approval (minimum seven days) for increases.
- Encouragement to reassess limits regularly for safety.

Real-Time Reality Check

Our platform includes an on-screen session timer that monitors playtime in real-time and prompts players to pause and evaluate their activity.

This tool encourages awareness and reduces the likelihood of excessive play.

Definitions

- Responsible Gaming: A framework of policies and procedures aimed at minimizing gambling-related harm while promoting safe and controlled gaming behavior.
- Vulnerable Groups: Individuals at higher risk of developing gambling-related problems, including minors (<18 years), those with gambling addictions, low-income individuals, and those with mental health disorders.
- Responsible Gaming Officer: A designated authority responsible for implementing and overseeing responsible gaming practices.
- Player: An individual who participates in online gaming activities while adhering to legal age and regulatory guidelines.
- Self-Exclusion: A voluntary process that allows individuals to temporarily or permanently restrict access to gaming activities.
- Marketing and Advertising: Promotional strategies used to market gaming products, subject to strict ethical and responsible gaming standards.
- Authorized Operator: A licensed entity authorized by the regulatory authority to conduct gaming operations.

Review and Policy Updates

The Responsible Gaming Policy is reviewed and revised at regular intervals to reflect:

- Evolving industry standards.
- Regulatory changes.

All updates are approved by the Board of Directors before implementation, ensuring consistency, compliance, and effectiveness in protecting our community.

