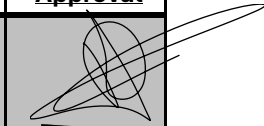
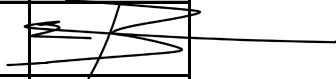


RESPONSIBLE GAMING POLICY

Games and More B.V. v 5.2

1. Document Information

Item	Description
Document Title	Responsible Gaming Policy
Company	Games & More B.V.
Company Number	149948
CGA Licence	OGL/2023/121/0086
Version	5.2
Document Owner	Compliance Director
Approved By	Board of Directors
Classification	Internal / Regulatory Submission
Review Frequency	Annually or when required

<u>Document Version</u>	<u>Responsible Office:</u>	<u>Approving Official</u>	<u>Document Purpose</u>	<u>Release Date</u>	<u>Signature for Approval</u>
4.0	Compliance Director	Compliance Director		05/02/2026	
5.2	Compliance Director	Director	Updated version	30/06/2026	

1.2 Purpose

This Policy establishes the Responsible Gaming framework of Games & More B.V. and sets out the governance, controls and procedures designed to minimise gambling-related harm while ensuring compliance with applicable legislation and the requirements of the Curaçao Gaming Authority.

Responsible Gaming is embedded throughout the Company's operations and forms part of its wider governance, compliance, AML/CFT, fraud prevention and operational risk framework.

gambling should remain a form of entertainment and is committed to identifying potential gambling-related harm at an early stage, providing effective player protection measures and taking appropriate action where necessary.

1.3 Scope

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This Policy applies to:

- the Board of Directors;
- the Statutory Director;
- the Compliance Director;
- the Responsible Gaming Officer;
- the MLRO;
- all employees;
- temporary staff;
- contractors;
- outsourced service providers performing activities on behalf of Games & More B.V.

The Policy applies to every gambling product, website, application and player account operated under the Company's CGA licence.

Compliance with this Policy is mandatory. Failure to comply may result in disciplinary action, contractual remedies or regulatory reporting where required.

1.4 Policy Principles

Games & More B.V. applies the following Responsible Gaming principles:

- Player protection takes precedence over commercial objectives.
- Gambling is promoted as entertainment rather than a source of income.
- Responsible Gaming measures are risk-based and proportionate.
- Early intervention is preferred over remedial action.
- Decisions affecting player protection are objective, documented and capable of regulatory review.
- Responsible Gaming responsibilities are integrated throughout the organisation.
- The effectiveness of Responsible Gaming controls is reviewed on an ongoing basis.

1.5 Regulatory Framework

This Policy has been developed in accordance with:

- National Ordinance on Games of Chance (LOK) (P.B. 2024 No. 157);
- National Ordinance on Identification when Rendering Services (NOIS) (P.B. 2017 No. 92);
- National Ordinance on the Reporting of Unusual Transactions (NORUT) (P.B. 2017 No. 99);
- National Sanctions Ordinance (NOST);
- Applicable licence conditions issued by the Curaçao Gaming Authority;
- Relevant CGA policy guidance relating to Responsible Gaming, AML/CFT, Player Complaints, Information Security and Terms and Conditions.

Where this Policy conflicts with applicable legislation or regulatory requirements, the higher standard shall apply.

1.6 Related Policies

This Policy should be read together with the Company's:

- Operational Manual;
- AML/CFT/CPF Policy;
- Customer Due Diligence Procedures;

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- Player Complaints Policy;
- Terms and Conditions;
- Information Security Policy;
- Marketing Policy;
- Bonus Policy;
- Privacy Policy.

1.7 Ownership and Review

The Compliance Director is responsible for maintaining this Policy, monitoring regulatory developments and presenting material amendments to the Board for approval.

The Policy will be reviewed:

- annually;
- following legislative or regulatory changes;
- following material Responsible Gaming incidents;
- following audit findings; or
- where operational changes require revision.

Upon approval, this version supersedes all previous Responsible Gaming Policies.

2. GOVERNANCE AND RESPONSIBILITIES

2.1 Governance

The Board of Directors has ultimate responsibility for the Company's Responsible Gaming Framework and shall ensure that adequate resources, systems and oversight are available to implement this Policy.

Responsible Gaming forms part of the Governance, Risk and Compliance Framework and is integrated with operational risk management, AML/CFT controls, player protection and internal control processes.

The Board receives periodic reporting on the effectiveness of the Responsible Gaming Framework and ensures that material deficiencies are addressed promptly.

2.2 Compliance Director

The Compliance Director is responsible for maintaining and overseeing the Responsible Gaming Framework.

Responsibilities include:

- Monitoring compliance with applicable legislation, licence conditions and internal policies.
- Overseeing the implementation of Responsible Gaming controls throughout the business.
- Reviewing Responsible Gaming incidents, trends and emerging risks.
- Reporting material findings and recommendations to Senior Management and the Board.

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- Coordinating periodic reviews of this Policy and ensuring that regulatory changes are incorporated where necessary.

Operational responsibilities may be delegated, however accountability for regulatory oversight remains with the Compliance Director.

2.3 Responsible Gaming Officer

The Responsible Gaming Officer manages the day-to-day operation of the Responsible Gaming Framework and acts as the primary escalation point for player protection matters.

Responsibilities include:

- Reviewing higher-risk player cases.
- Assessing behavioural alerts and intervention requests.
- Approving Responsible Gaming interventions where necessary.
- Maintaining Responsible Gaming records.
- Supporting Customer Support in complex player interactions.
- Preparing management reporting and trend analysis.

The Responsible Gaming Officer shall act independently of commercial decision-making where player protection may be affected.

2.4 Customer Support

Customer Support is responsible for assisting players with Responsible Gaming enquiries and recognising indicators of gambling-related harm.

Employees shall:

- Explain the Responsible Gaming measures available to players.
- Assist with deposit limits, cooling-off periods and self-exclusion requests.
- Record material player interactions.
- Escalate higher-risk cases to the Responsible Gaming Officer without delay.

Customer Support employees shall not provide financial, legal or medical advice.

2.5 Marketing

Marketing activities shall support Responsible Gaming objectives and comply with applicable legislation, licence conditions and internal approval procedures.

Marketing shall not target:

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- Minors.
- Self-excluded players.
- Vulnerable players.
- Players subject to Responsible Gaming interventions.

Where required, promotional material shall be reviewed by Compliance before publication.

2.6 Technology

Technology controls shall support the effective operation of Responsible Gaming measures.

This includes maintaining reliable player protection tools, behavioural monitoring, audit trails, access controls and system functionality required to support this Policy.

Material system changes affecting Responsible Gaming shall be assessed before implementation.

2.7 Employees

All employees are responsible for complying with this Policy and supporting the Company's Responsible Gaming objectives.

Employees shall complete mandatory training, report concerns through the appropriate escalation channels, maintain confidentiality and cooperate with Compliance reviews and investigations.

Failure to comply with this Policy may result in disciplinary action.

2.8 Outsourced Service Providers

Where Responsible Gaming activities are outsourced, Games & More B.V. remains responsible for compliance with applicable legal and regulatory requirements.

Service providers shall operate under written agreements that define their responsibilities, reporting obligations and service standards. Their performance shall be monitored as part of the Company's outsourcing oversight programme.

3. PLAYER REGISTRATION AND VERIFICATION

3.1 General

Games & More B.V. only permits gambling through registered player accounts. Anonymous, fictitious or shared accounts are prohibited.

Players may only hold one active account unless additional accounts are approved for a legitimate operational reason.

Registration and verification form part of the Company's player protection framework and support both Responsible Gaming and AML/CFT obligations.

3.2 Account Registration

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Before an account is activated, the player shall provide sufficient information to establish their identity and eligibility to gamble.

As a minimum, the Company collects:

- Full legal name.
- Date of birth.
- Residential address.
- Country of residence.
- Email address.
- Mobile telephone number.

Additional information or documentation may be requested where required for regulatory, security or Responsible Gaming purposes.

3.3 Eligibility

Before permitting gambling activity, the Company takes reasonable steps to ensure that the player:

- Is at least eighteen (18) years of age.
- Is legally permitted to gamble.
- Is not subject to an active self-exclusion or regulatory restriction.
- Is not located in a prohibited jurisdiction.

Where these requirements cannot be satisfied, the account will remain restricted or be refused.

3.4 Age Verification

Games & More B.V. applies appropriate controls to prevent underage gambling.

Where there is reason to believe that an account belongs to, or is being used by, a minor, the account shall be suspended immediately pending investigation.

If underage gambling is confirmed, the account shall be closed and any required regulatory or contractual action shall be taken.

3.5 Identity Verification

Player identity shall be verified in accordance with the Company's Customer Due Diligence Procedures and applicable legislation.

Verification may include documentary verification, electronic verification, biometric checks or other reliable methods appropriate to the level of risk.

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Where verification cannot be completed within the prescribed timeframe, appropriate restrictions shall remain in place until verification is completed.

3.6 Duplicate Accounts

controls to identify duplicate or linked accounts.

Where duplicate accounts are identified, Games & More B.V. may request additional information, suspend one or more accounts, merge player records where necessary or close accounts where misuse is identified.

All actions shall be documented.

3.7 Ongoing Verification

Player information is reviewed throughout the business relationship and updated whenever required.

Additional verification may be requested where:

- Player information changes.
- Risk levels increase.
- Regulatory requirements change.
- Previously obtained information is no longer considered reliable.

3.8 False or Misleading Information

Where a player provides false, misleading or fraudulent information, the Company may suspend or close the account, reject transactions and report the matter to the appropriate authorities where required by law.

3.9 Player Information

Before gambling, players are provided with clear information regarding:

- Responsible Gaming measures.
- Player protection tools.
- Terms and Conditions.
- Privacy Policy.
- Player Complaints Policy.
- Available support services.

This information remains accessible throughout the player relationship.

3.10 Record Keeping

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Registration and verification records shall be retained in accordance with applicable legal and regulatory requirements and be available for inspection by the Curaçao Gaming Authority upon request.

Information obtained during onboarding may also be considered as part of the Company's Responsible Gaming risk assessment where relevant.

4 RESPONSIBLE GAMING MEASURES

4.1 General

Games & More B.V. provides players with practical tools to help manage their gambling activity. These measures are available without charge and remain accessible throughout the player relationship.

Responsible Gaming measures are intended to encourage informed decision-making, reduce the risk of gambling-related harm and support early intervention where necessary.

4.2 Responsible Gaming Information

a dedicated Responsible Gaming section that is clearly accessible from its website and player account.

The Responsible Gaming section contains information on:

- Responsible Gaming principles.
- Available player protection tools.
- Self-assessment resources.
- Cooling-off periods.
- Self-exclusion.
- Contact details for Responsible Gaming assistance.
- Links to recognised support organisations.

Responsible Gaming information is available in English and, where necessary, in the language of the target market.

4.3 Deposit Limits

Players may set daily, weekly or monthly deposit limits at any time.

Requests to reduce a deposit limit take effect immediately.

Requests to increase a deposit limit become effective only after the applicable cooling-off period.

Once a deposit limit has been reached, no further deposits are permitted until the limit resets or is otherwise amended in accordance with this Policy.

4.4 Loss, Wager and Session Limits

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Players may restrict:

- Net losses.
- Total wagering.
- Session duration.

Where a selected limit is reached, the applicable restriction will automatically apply until the relevant period expires.

4.5 Reality Checks

Players receive periodic reality check notifications during gameplay.

Notifications include, where applicable:

- Time spent gambling.
- Recent gambling activity.
- Access to Responsible Gaming tools.
- The option to end the session.

Reality checks are intended to assist players in making informed decisions regarding their gambling behaviour.

4.6 Cooling-Off

Players may suspend gambling activity for one of the following periods:

- 24 hours.
- 7 days.
- 1 month.
- 3 months.

During a cooling-off period:

- Gambling activity is disabled.
- Promotional communications cease where practicable.
- The restriction cannot be cancelled before expiry.

Upon expiry, account access is automatically restored unless another restriction applies.

4.7 Self-Exclusion

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Players may voluntarily self-exclude for one of the following periods:

- 1 year.
- 3 years.
- 5 years.
- 10 years.
- Permanently.

Self-exclusion requests are implemented without unnecessary delay.

During the exclusion period the player is prevented from accessing gambling services and does not receive promotional material.

Following expiry of a fixed-term exclusion, gambling access will only be restored after the Company has completed an appropriate review and received a written request from the player.

The Company will not encourage a self-excluded player to resume gambling.

4.8 Operator-Initiated Restrictions

Games & More B.V. may restrict, suspend or close a player account where there are reasonable grounds to believe that continued gambling presents an unacceptable level of risk.

This may include situations involving:

- Indicators of gambling-related harm.
- Circumvention of Responsible Gaming controls.
- Fraudulent or unlawful activity.
- Regulatory requirements.

Player protection decisions shall never be based solely on the amount won by a player.

4.9 Self-Assessment

Players are encouraged to assess their gambling behaviour regularly through recognised self-assessment tools.

The Responsible Gaming section includes access to:

- The Gamblers Anonymous 20 Questions.
- The CAGE Gambling Self-Assessment.

Players may also review at least six months of account and transaction history directly through their player account. Additional historical information may be requested from the Company.

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4.10 Support Services

Where appropriate, players are directed to independent organisations providing support for gambling-related harm.

The Responsible Gaming section includes links to recognised support organisations and explains how players may contact Games & More B.V. regarding Responsible Gaming concerns.

4.11 No Credit for Gambling

Games & More B.V. does not provide credit, loans or deferred payment facilities for the purpose of gambling.

Responsible Gaming measures shall not be bypassed through promotional campaigns, bonus offers or alternative payment arrangements.

4.12 Records

The use of Responsible Gaming tools, restrictions, self-exclusions and related player communications shall be retained in accordance with Chapter 10.

5. PLAYER MONITORING, RISK ASSESSMENT AND INTERVENTION

5.1 General

Games & More B.V. applies a risk-based approach to identify, assess and respond to indicators of gambling-related harm throughout the player relationship.

Monitoring combines automated system alerts, transactional analysis and manual reviews. identify potential concerns at an early stage and apply proportionate measures that support responsible play.

Responsible Gaming monitoring operates independently from AML/CFT monitoring, although relevant information may be considered where necessary.

5.2 Risk Assessment

Each player is assessed using available information, including:

- Frequency and duration of play.
- Deposit, wagering and withdrawal patterns.
- Significant changes in gambling behaviour.
- Use of Responsible Gaming tools.

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- Previous Responsible Gaming interactions.
- Customer Support observations.
- Complaints relating to gambling behaviour.
- Any other information relevant to player protection.

Risk assessments remain dynamic and are updated whenever material new information becomes available.

5.3 Risk Classification

Players are assigned one of the following risk categories:

Low Risk

Normal gambling behaviour with no indicators requiring further action.

Medium Risk

One or more indicators suggesting an increased risk of gambling-related harm requiring additional monitoring or player interaction.

High Risk

Multiple or significant indicators requiring immediate review, enhanced monitoring and appropriate intervention.

Risk classifications may be amended following further assessment by the Responsible Gaming Officer.

5.4 Behavioural Monitoring

Behavioural monitoring forms part of the ongoing Responsible Gaming programme.

Indicators may include:

- Sudden increases in deposits or wagering.
- Extended gambling sessions.
- Frequent cancelled withdrawals.
- Repeated failed deposit attempts.
- Multiple changes to gambling limits.
- Repeated cooling-off periods.
- Requests for Responsible Gaming assistance.

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- Behaviour suggesting financial or emotional distress.

The presence of one indicator does not automatically mean that a player is experiencing gambling-related harm. Each case is assessed individually using all available information.

5.5 Automated Monitoring

Where automated monitoring systems are used, alerts are reviewed by appropriately trained personnel before any action is taken.

Automated monitoring supports decision-making but does not replace professional judgement.

5.6 Responsible Gaming Review

Where monitoring identifies an elevated level of risk, the Responsible Gaming Officer shall review the player's activity and determine whether further action is appropriate.

The review may consider:

- Gambling behaviour.
- Previous Responsible Gaming interactions.
- Account history.
- Customer communications.
- Use of Responsible Gaming measures.
- Any other relevant information available at the time of assessment.

5.7 Player Interaction

Where appropriate, Games & More B.V. will contact the player to discuss observed gambling behaviour and remind the player of the Responsible Gaming tools available.

Communications shall remain factual, professional and supportive.

Employees shall not provide financial, legal or medical advice.

Where appropriate, players will be directed to recognised gambling support organisations.

5.8 Intervention Measures

Depending on the level of identified risk, one or more of the following measures may be applied:

- Providing Responsible Gaming information.
- Encouraging the use of gambling limits.
- Recommending a cooling-off period.

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- Discussing voluntary self-exclusion.
- Increasing the level of account monitoring.
- Applying temporary account restrictions.
- Suspending or closing the account where justified.

The action taken shall always be proportionate to the circumstances of the individual player.

5.9 Documentation

All Responsible Gaming reviews, player interactions, decisions and interventions shall be recorded within the Player Account Management system or another approved case management system.

Records shall include:

- Date of assessment.
- Reason for review.
- Risk classification.
- Actions taken.
- Employee responsible.

These records support internal oversight, regulatory inspections and ongoing monitoring.

5.10 Escalation

Higher-risk cases shall be escalated to the Responsible Gaming Officer promptly.

Where necessary, the Responsible Gaming Officer may consult the Compliance Director before implementing enhanced restrictions or account closure.

Material Responsible Gaming cases shall be reported to Senior Management where they present operational, regulatory or reputational risk.

5.11 Continuous Monitoring

Responsible Gaming monitoring remains active throughout the customer relationship.

The effectiveness of monitoring controls, intervention measures and risk indicators shall be reviewed periodically to ensure they remain appropriate for the Company's products, player profile and regulatory obligations.

6. PROTECTION OF VULNERABLE PLAYERS

6.1 General

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Games & More B.V. is committed to identifying and protecting players who may be at increased risk of gambling-related harm.

Player protection measures are applied on a risk-based basis and take account of the player's behaviour, available information and previous Responsible Gaming interactions.

6.2 Vulnerable Players

For the purposes of this Policy, a vulnerable player includes any person who:

- Is under eighteen (18) years of age.
- Demonstrates insufficient control over their gambling behaviour.
- Has voluntarily or involuntarily excluded themselves from gambling.
- Has been declared bankrupt where this information is known to the Company.
- Otherwise displays behaviour indicating an increased risk of gambling-related harm.

vulnerability may be temporary or ongoing and therefore assesses each case individually.

6.3 Identification

Potential vulnerability may be identified through:

- Behavioural monitoring.
- Player communications.
- Customer Support observations.
- Responsible Gaming interactions.
- Information received from third parties.
- Compliance reviews.

A single indicator does not automatically classify a player as vulnerable. Decisions are based on the overall circumstances of the individual case.

6.4 Protective Measures

Where a player is considered vulnerable, Games & More B.V. may implement one or more of the following measures:

- Provide Responsible Gaming information.
- Encourage the use of Responsible Gaming tools.
- Conduct direct player interaction.

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- Increase monitoring.
- Apply account restrictions.
- Recommend or implement self-exclusion.
- Suspend or close the account where necessary.

The measures applied shall be proportionate to the identified level of risk.

6.5 Direct Player Interaction

Where direct contact is appropriate, communications shall be clear, respectful and supportive.

encourage responsible gambling, explain the protection measures available and assist the player in making informed decisions.

Employees shall not diagnose gambling addiction or provide medical, legal or financial advice.

6.6 Support Organisations

Where appropriate, players shall be referred to recognised organisations specialising in gambling-related support.

Information on available support services shall remain accessible through the Responsible Gaming section of the Company's website.

6.7 Operator-Initiated Exclusion

Games & More B.V. may suspend or terminate a player relationship where continued gambling presents an unacceptable risk to the player, the Company or the integrity of its operations.

Operator-initiated restrictions may be applied where:

- There is evidence of serious gambling-related harm.
- A player repeatedly circumvents Responsible Gaming measures.
- There is evidence of fraud or unlawful activity.
- Continued gambling would conflict with the Company's legal or regulatory obligations.

Such decisions shall be documented and approved by the Responsible Gaming Officer or Compliance Director.

A player shall never be excluded solely because they have been successful or profitable.

6.8 High-Risk Players

Players assessed as High Risk remain subject to enhanced monitoring until the Responsible Gaming Officer determines that the level of risk has reduced.

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Enhanced monitoring may include more frequent account reviews, additional player interactions and further restrictions where necessary.

6.9 Record Keeping

All vulnerability assessments, interactions, restrictions and decisions shall be retained in accordance with Chapter 10.

These records shall be available for regulatory inspection and internal review.

7. MARKETING, BONUSES AND PLAYER COMMUNICATIONS

7.1 General

Games & More B.V. conducts all marketing and promotional activities responsibly and in accordance with applicable legislation, licence conditions and internal approval procedures.

Marketing shall support informed player decisions and shall never undermine the Company's Responsible Gaming Framework.

7.2 Responsible Advertising

Advertising and promotional material shall not:

- Target minors or vulnerable persons.
- Target self-excluded or restricted players.
- Present gambling as a source of income or financial security.
- Suggest that gambling resolves financial, personal or emotional problems.
- Misrepresent the likelihood of winning or the role of skill in games of chance.
- Encourage excessive, reckless or continuous gambling.
- Associate gambling with social, sexual or professional success.
- Include content that is misleading, offensive or otherwise contrary to applicable law or regulatory expectations.

All advertising shall include a clear Responsible Gaming message where necessary.

7.3 Bonuses and Promotions

Bonus offers shall be transparent, fair and supported by clear terms and conditions.

Promotional campaigns shall not:

- Encourage excessive gambling.

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- Circumvent Responsible Gaming measures.
- Incentivise players to increase gambling beyond their normal behaviour.

Where a player is subject to Responsible Gaming restrictions, the Company may withhold promotional offers where necessary.

7.4 Direct Marketing

Players may manage their communication preferences at any time.

Marketing communications shall not be sent to:

- Self-excluded players.
- Players subject to cooling-off periods where applicable.
- Players who have opted out of promotional communications.

Responsible Gaming restrictions shall always take precedence over commercial communications.

7.5 Affiliates and Third Parties

Games & More B.V. remains responsible for marketing conducted on its behalf by affiliates, advertising partners, ambassadors, influencers or other third parties.

Agreements with third parties shall require compliance with the Company's Responsible Gaming standards and applicable regulatory requirements.

Where non-compliant marketing is identified, corrective action shall be taken promptly.

7.6 Responsible Gaming Information

Responsible Gaming information shall remain available throughout the player journey and include access to:

- Responsible Gaming tools.
- Self-assessment resources.
- Cooling-off and self-exclusion.
- Independent support organisations.
- Player Complaints procedures.

Players shall be able to access this information directly from the Company's website and player account.

7.7 Communications with Players

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Where the Company contacts a player regarding Responsible Gaming, communications shall be clear, respectful and based on factual observations.

The purpose of these communications is to promote informed decision-making and encourage the use of available Responsible Gaming measures.

Employees shall not provide advice that could reasonably be interpreted as financial, psychological or medical counselling.

7.8 Records

Material Responsible Gaming communications and decisions relating to marketing restrictions shall be recorded where required to support regulatory compliance, internal oversight and audit activities.

8. PLAYER COMPLAINTS AND ALTERNATIVE DISPUTE RESOLUTION

8.1 General

Responsible Gaming complaints shall be handled promptly, fairly and in accordance with the Company's Player Complaints Policy.

Complaints relating to player protection shall receive appropriate priority and be assessed by suitably authorised personnel.

8.2 Complaint Handling

Players may submit a Responsible Gaming complaint through the communication channels published on the Company's website.

Upon receipt, the Company will:

- Acknowledge the complaint within the prescribed timeframe.
- Review all relevant player records and account activity.
- Investigate the circumstances giving rise to the complaint.
- Provide a reasoned decision.

Where additional time is required, the player shall be informed accordingly.

8.3 Investigation

Investigations may consider:

- Account activity.
- Responsible Gaming assessments.
- Previous player interactions.

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- Gambling behaviour.
- Customer Support records.
- Any other relevant information.

Investigations shall be objective, properly documented and completed by personnel independent from the original decision where necessary.

8.4 Alternative Dispute Resolution

Where a complaint cannot be resolved internally, the player shall be informed of the available Alternative Dispute Resolution (ADR) procedure.

Details of the Company's appointed ADR provider are published on the Company's website and within the Player Complaints Policy.

The Company shall cooperate fully with any ADR process where applicable.

8.5 Complaints Register

All Responsible Gaming complaints shall be recorded in the complaints register.

Records shall include:

- Date received.
- Nature of the complaint.
- Investigation outcome.
- Corrective action taken.
- Date of closure.

Complaint data shall be reviewed periodically to identify trends and opportunities to improve the Responsible Gaming Framework.

9. TRAINING, COMPLIANCE MONITORING AND REPORTING

9.1 Staff Training

Employees whose duties involve player interaction, compliance, marketing, Responsible Gaming or customer support shall complete Responsible Gaming training before performing those responsibilities.

Training shall be refreshed at least annually and whenever significant legislative, regulatory or operational changes occur.

Training includes, where relevant:

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- Responsible Gaming principles.
- Behavioural indicators.
- Player interaction techniques.
- Escalation procedures.
- Use of Responsible Gaming tools.
- Record keeping.
- Regulatory obligations.

Training records shall be maintained by the Company.

9.2 Compliance Monitoring

The Compliance Department monitors adherence to this Policy through its Compliance Monitoring Programme.

Monitoring activities may include:

- File reviews.
- Control testing.
- Thematic reviews.
- Player interaction reviews.
- Complaint analysis.
- Follow-up of corrective actions.

Findings are reported to Senior Management and the Board together with recommendations where improvements are required.

9.3 Management Reporting

The Responsible Gaming Officer shall prepare periodic management information covering the operation of the Responsible Gaming Framework.

Reporting may include:

- Behavioural monitoring trends.
- Responsible Gaming interactions.
- Self-exclusions.
- Player complaints.

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- Material incidents.
- Compliance monitoring outcomes.

The Compliance Director shall report significant findings, emerging risks and material deficiencies to the Board.

9.4 Independent Review

The Responsible Gaming Framework shall be reviewed periodically to assess its effectiveness and continued compliance with legal and regulatory requirements.

Independent assurance may be obtained through Internal Audit or a suitably qualified external party.

Recommendations shall be documented, assigned and monitored until completed.

10. RECORD KEEPING, POLICY REVIEW AND GOVERNANCE

10.1 Record Retention

Responsible Gaming records shall be retained for a minimum of five (5) years, or longer where required by law or regulatory instruction.

Records include, where applicable:

- Risk assessments.
- Player interactions.
- Responsible Gaming interventions.
- Complaints.
- Self-exclusions.
- Cooling-off requests.
- Training records.
- Monitoring reports.
- Management reporting.

Records shall remain secure, complete and readily available for inspection by the Curaçao Gaming Authority.

10.2 Confidentiality

Responsible Gaming information shall be treated as confidential and accessed only by authorised personnel with a legitimate business need.

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Personal data shall be processed in accordance with applicable privacy legislation and the Company's Privacy Policy.

10.3 Policy Review

The Compliance Director shall review this Policy at least annually and whenever:

- Applicable legislation changes.
- The Curaçao Gaming Authority issues new guidance.
- Material Responsible Gaming incidents occur.
- Audit or compliance findings require amendments.
- Operational changes materially affect the Responsible Gaming Framework.

Material amendments shall be submitted to the Board for approval before implementation.

10.4 Annual Effectiveness Assessment

At least once each year, the Responsible Gaming Officer shall assess the effectiveness of the Responsible Gaming Framework and submit a written report to Senior Management and the Board.

The assessment shall consider:

- The effectiveness of Responsible Gaming controls.
- Trends identified through monitoring and complaints.
- Regulatory developments.
- Audit findings.
- Recommendations for improvement.

Where required, material changes to this Policy shall be communicated to the Curaçao Gaming Authority.

10.5 Approval

This Policy is approved by the Board of Directors of Games & More B.V. and becomes effective on the date of approval.

The Board confirms its commitment to maintaining an effective Responsible Gaming Framework that promotes responsible gambling, protects players and complies with the requirements of the National Ordinance on Games of Chance (LOK) and the Curaçao Gaming Authority.

Upon approval, Version 5.2 supersedes all previous versions of the Responsible Gaming Policy.

