

LBC Enterprises

Responsible Gaming Policy

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1. Introduction

At LBC Enterprises, we support Responsible gaming by providing users a range easy to use and find self-service Responsible Gaming tools, maintaining a comprehensive Responsible Gaming page with valuable resources, and actively reviewing accounts that may raise concerns to ensure player safety and well-being and in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the requirements of the Curaçao Gaming Authority (CGA).

2. Player Responsible Gaming Tools

We offer tools to help players manage their gambling effectively

2.1 Deposit Limits

- Players can set an amount they can deposit on a daily, weekly or monthly basis.
- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.

2.2 Reality Checks

Players get pop ups of how long they spent online and wins and losses. When triggered, the player is required to confirm message before resuming play.

3. Adjusting Limits

- Requests for reducing deposit limits are set within 24 hours whilst increases subject to 7 (seven) days' notice.

Limits can be adjusted anytime by contacting our support team.

4. Self-Exclusion Options

To assist those who need a break from gambling, we provide several self-exclusion options:

4.1 Time-Out Period (Cooling Off) & Self Exclusion

- Players can choose a specific Time-Out period ranging from minimum 72 (seventy-two) hours and cannot be over a maximum 14 (fourteen) days by contacting our Lucky Bet support team. After that time passes your account will be automatically unlocked.
- Players can choose a specific Self Exclusion period between a minimum 6 (six) months to a maximum of 5 (five) years as duration for your self-exclusion period.
- A Permanent Self-Exclusion cannot be revoked.
- A Self-Exclusion applies across all current and future brands owned by LBC Enterprises.
- Registered Payment methods are blocked to prevent future use for Self-Excluded players regardless of the amount of time of their Self-exclusion, including Permanent Self-Exclusion.
- The option for activation of Self Exclusion and concise steps are displayed on our www.luckybet.co

4.2 Account Status During Time-Out Period & Self-Exclusion

- The player's account balance remains intact, and withdrawals can be requested through support during a Time-Out Period.
- Self-Excluded accounts with real money balance or/and any pending withdrawals will be processed and paid within 2 working days, standard KYC and AML procedures may apply.
- No marketing communications will be sent during this period.

During a temporary break or self-exclusion, you are not allowed to create a new account or access any service on the website, besides the assistance from our support. Every attempt to create a new account on the website or any attempt to participate in any of the gambling services offered on it during a such a period is a violation of our terms. Upon our tracking, this will result in the permanent ban of your original account as well as your newly created or used account. The Company is not liable for any losses that may occur to you, disregarding the losses' nature, if you circumvent the temporary break or violate the terms.

4.3 Reopening Accounts

Players can reactivate their account after a self-exclusion period has elapsed, by contacting customer Lucky Bet support via email.

Also, you can take a self-test to find out, if you are still gambling addicted at <https://www.begambleaware.org/gambling-problems/do-i-have-a-gambling-problem/>

4.4 Compliance with Exclusion

Creating new accounts to bypass self-exclusion is prohibited. Such accounts will be closed, and losses incurred will remain the players responsibility.

4.5 Player Information Accessibility

Players can obtain information about our Responsible Gaming Feature and Self Exclusion on our website' section on Responsible Gaming and via emailing:

- The Lucky Bet support team
- The Lucky Bet compliance team

In addition, as follows:

- The Terms and Conditions of the website which is located one click away from the homepage
- Lucky Bet CGA digital seal

You can also find the contact details at the Contact Section of this Policy.

5. Advertising & Marketing

All advertising will include messages promoting responsible gambling, such as:

- *“Gambling can be addictive, please Play Responsibly. For help visit our Responsible Gambling page. Underage gambling is an offense, +18”*
- Tools such as betting limits will be highlighted in promotional materials from time to time

5.1 Marketing Opt-Out for Responsible Gambling Measures

- **Time Out:** Players who have opted for a *Time Out* (temporary suspension of player account) will be automatically removed from all marketing and promotional communications for the duration of their Time Out.
- **Self-Exclusion:** Players observing a *Self-Exclusion* will also be automatically removed from all marketing and promotional communications for the duration of their Self-Exclusion period.
- **Permanent Self-Exclusion:** Players observing a *Permanent Self-Exclusion* will have their details permanently removed from the marketing database to ensure no further communication.

5.2 Email Communication Standards

All email communications sent by Lucky Bet must adhere to the following requirements:

- **Company Footer:** Every email must include a footer that contains:
 - A Responsible Gaming Disclaimer
 - A Curaçao Gaming Authority Dynamic Seal
 - Company Details
 - Help Organization Logos
 - 18+ Logo
 - The terms and conditions (T&Cs) for any offer mentioned in the email.
 - An unsubscribe option allowing recipients to opt out of future communications easily.
- **Accuracy:** All email content must align with this Advertising Policy, providing accurate and non-misleading information.
- **Consent:** Emails must only be sent to individuals who have explicitly opted in to receive marketing communications.

6. Account Review

We use the following analysis to determine their involvement in gaming to help determine the gameplay indicators, behavioural indicators & determine the risk level.

- Transactional - Payment methods:
 - Determine if it is Debit or Credit.
 - Number of payment methods used.
- Deposits/ Withdrawals
 - Net losses/ profit over the number of active months.
 - Deposits following withdrawals.
 - Failed deposits: declined/ no funds/ no system error related.
 - Cancelled withdrawals.
 - Deposits per session.
- Game Play & Gameplay patterns:
 - Stakes
 - Session's activity
 - Prolonged gaming by game rounds
 - Types of games
 - Deposit patterns
- RG Tools Usage
 - Limit Changes
 - Session limits
 - Take a break.
 - Self- exclusion
- Behavioural - Communications:
 - Live chats transcripts
 - Emails

Any problematic behavioural indicators are escalated to the Responsible Gaming officer for evaluating and determining the imposition of any restrictions.

7. Responsible Gaming Training

- Employees that hold a player facing role will get extensive quarterly in-house Responsible Gaming training conducted by the Head of Responsible Gaming or Responsible Gaming Specialist.
- Annual Responsible Gaming training is given to employees with player facing roles along with management by an outsourced training partners which specialize in Safer Gambling and courses.

8. Right to Intervene

We reserve the right to block or close accounts and return real balances if continued use of our services is deemed harmful to a player's well-being.

The Company may restrict your account or deny you access to the website if the staff undoubtedly knows about a severe gambling addiction you might develop or have in your own interest. The Company, third party partners and license holder are not liable for preventing gambling addictions or adverse side effects. Please gamble responsibly. Additionally, the Company cannot guarantee that its staff can find any upcoming addiction and take measurements before harmful side effects occur. For further questions regarding the Company's staff acts and actions, please get in touch with the support through the information given in the Contact Section of this Policy.

9. Underage Gambling

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- Gambling is prohibited for individuals under 18.
- Players will be requested to enter their Date of Birth upon registration and declare that they are of legal age, over 18 years old.
- Full KYC is requested if any accounts are suspected to be registered by a minor.
- Any underage activity is maintained on records and their outcomes. These records must be kept indefinitely and readily available for regulatory review.
- Accounts created by underage users will be closed immediately and will be blacklisted to prevent creation of future accounts and payment method used will be blocked.
- Deposits will be refunded within **24 hours** to the original payment method when possible after identifying the incident. The deposits will remain on the account until refunded.
- Any winnings will be forfeited.

10. Self-Exclusion Register

All Self-Excluded player details are logged on the register which is kept indefinitely and includes:

- Player Name
- Username
- Email Address
- Phone Number
- From & Expiry Date
- Channel – Front End or Via other means

11. Support for Problem Gambling

We are committed to helping those struggling with gambling addiction.

You can also find additional information about gambling addictions and the adverse side effects that they may cause at:

<https://www.begambleaware.org/safer-gambling/>

Further general information regarding the topic and free support you can find at:

<https://www.gamcare.org.uk/>

Helpful hints for responsible gambling at Lucky Bet.com

12. Additional Tips for Responsible Gambling

To further support responsible gambling, we recommend the following measures to players via our Responsible Gaming Page and Email Communications:

12.1 Device Blockers

Consider using device-blocking software to limit access to gambling websites. Popular options include:

- Gamblock
- Betblocker

12.2 Minor Protection

To use our Service, you must be 18 (eighteen) years of age or older. Keep your login data and password safe from any minors near you to avoid abuse. You are responsible for safeguarding the password and 2-factor-authentication that you use to access the website, your account, and for any activities or actions from your account.

We recommend that all parents install a filter program or plug-in to prevent minors and children from accessing content and websites not made for them. Please consider installing such a plug-in or filter program to protect your children from potentially harmful content. We can recommend the following programs and plug-ins to parents to protect their children and other minors with access to their electronic devices from accessing harmful content:

Basic Version: <https://famisafeapp.wondershare.com/login.html>

Premium Version: <https://www.qustodio.com/en/free-sign-up/>

13. Contact

If you have any questions, issues, suggestions, problems, or feedback, feel free to contact our Lucky Bet Support Team and our Lucky Bet Compliance Team at any time:

By E-Mail: support@luckybet.co

By E-Mail: CS@luckybet.co

LBC Enterprises B.V.
Curacao, 22 December 2025

Capital Trust Corporation N.V.
Managing Director



De-Anne Kelly
Money Laundering Compliance Officer