

GEM Solutions B.V.

Responsible Gambling Policy

1. Policy Statement

This Responsible Gambling Policy outlines the measures implemented by the operator to foster a safe, transparent and responsible gaming environment in accordance with the Curaçao Gaming Authority (CGA) guidelines and international best practices. Our commitment is to protect players, prevent problem gambling and promote responsible gaming behavior.

This Policy is divided into two parts:

The first part which outlines measures taken by the company to enforce Responsible Gambling and acts as an internal guideline.

The Second part which will be available on each website, available to players including guidelines and hyperlinks to request self-exclusion and set limits as outlined in this policy

2. Player Protection and Accessibility

We provide clear access to Responsible Gambling information on our homepage and throughout our website. This includes tools for self-assessment, deposit limits, session reminders, cooling-off periods and self-exclusion.

All responsible gambling tools are available in English and other relevant market languages. Players can access support resources such as Gamcare, Gamblers Anonymous, and local organizations where applicable.

3. Age Verification

Strict age verification is enforced during registration using government-issued ID, date of birth validation and secondary checks where necessary. Underage gambling is strictly prohibited and monitored.

Parental control tools are recommended to guardians, including Net Nanny (www.netnanny.com), GamBlock (www.gamblock.com) and CyberSitter (www.cybersitter.com)

More information on how age verification is enforced can be found in company's AML Policy which also serves as a general Guideline internally.

4. Self-Assessment and Behaviour Tracking

Players have access to self-assessment tools e.g., the GA 20-question quiz and CAGE questionnaire outlined in part 2 of this Policy. We monitor deposit patterns, session durations, and behavior using AI and trained staff to identify signs of harm.

Risk indicators include frequent limit changes, reversed withdrawals and unrealistic wagering activity. All concerning behavior is documented and escalated appropriately.

5. Player Interventions and Staff Training

Customer support and responsible gaming teams are trained to recognize problem gambling behavior and conduct sensitive interventions. Escalations are reviewed by the Compliance Officer for the time-being until such time that company appoints a Responsible Gaming Officer.

Interventions may include communication with the player, setting limits, temporary suspension or full exclusion.

6. Cooling-Off and Self-Exclusion

Players may activate cooling-off periods (24h, 7d, 1m, 3m) or self-exclusion (1y, 3y, 5y, 10y, lifetime) without staff intervention. These actions take effect immediately, block gameplay, and remove players from marketing lists.

All self-exclusions are recorded for 7 years. Self-excluded accounts are deactivated and cannot be reopened until the term ends.

7. Financial Limits and Reality Checks

Players can set daily, weekly or monthly deposit limits. Reductions take effect immediately; increases are delayed by seven days.

Reality checks (session timers, activity summaries) are implemented with the option to customize reminders. Players must acknowledge these messages before continuing.

8. Marketing and Advertising Standards

Marketing must not target minors, vulnerable individuals or promote gambling as a financial solution. All content must be age-gated and compliant with relevant local media guidelines.

Affiliates and influencers are contractually required to uphold responsible gaming standards. No promotional messages are sent during exclusion or cooling-off periods.

9. Regulatory Compliance and Reporting

All exclusion, limit and risk events are documented in real time. Reports are submitted to the CGA as required. Violations (e.g., self-excluded player activity) trigger a full investigation and response report within five working days.

All changes to this policy are documented and submitted to the CGA as per Clause 12.1 of the LOK.

10. Responsible Gaming Oversight

The Compliance Officer oversees policy implementation and reports annually to Executive Management until such time that a Responsible Gambling Officer is appointed. Updates are made proactively based on player behavior trends, regulatory changes and operational needs.

11. Version Control

Company is constantly improving its policies to ensure best practice and must notify the CGA of all changes and therefore requires a version control to keep track of all changes.

Version Control is updated each time whether there is a change in the internal Policy or the version available on each website.

Version	Date	Drafted By
1.1	May 21, 2025	Compliance Officer

Responsible Gaming

INTRODUCTION

GEM Solutions B.V. is promoting responsible behavior in gaming as a part of customer care and social responsibility policy. We see it as our obligation to you, our customers, to guarantee that you have a positive wagering experience on our site while also being mindful of the social and financial consequences of problem gambling.

MAINTAINING CONTROL

Gambling should be regarded as a recreational activity rather than a source of income. While the majority of people view gambling as a recreational activity and spend just what they can afford to risk, for some it may be more challenging. To keep your gambling habits under control, we suggest you keeping in mind the following points:

Gambling should be done moderately and as a source of entertainment rather than a legitimate way of gaining money

Avoid loss-chasing and amplifying your betting – there is always another day

Only bet when you can accept a loss

Keep in mind the amount of time and money you spend

If you need a break from gambling, you can activate self-exclusion from one or all products by contacting Support

If you have any concerns regarding your gambling behavior, please contact one of the organisations which we referred to below.

RECOGNIZING A PROBLEM

If you are concerned that gambling has had a harmful impact on your life or the life of someone else, the questions below may help you determine this.

Is gambling keeping you from going to job or college?

Do you gamble to entertain yourself or to avoid boredom?

Do you gamble alone for extended periods of time?

Have other people pointed out your gambling habits?

Have you lost interest in family, friends, or hobbies as a result of your gambling?

Have you ever lied about how much money or time you spend gambling?

Have you lied, stolen, or borrowed to continue your gambling habits?

Do you find it difficult to spend your "gambling money" on anything else?

Do you gamble till you run out of money?

Do you feel obligated to try to recoup your losses as quickly as possible after losing?

Do you feel lost and in despair if you run out of money while gambling, and do you feel the desire to gamble again as quickly as possible?

Do you feel the need to gamble after arguments, disappointments, and frustrations?

Does gambling bring you depressing or even suicidal thoughts?

The more questions you answer "yes" to, the higher the likelihood of you having problems with your gambling. Please call one of the organizations listed below under Gambling Help Organizations to speak with someone who can provide you with guidance and assistance.

Gambling Help Organizations

GamCare, the main authority across Great Britain providing counselling, advice, and practical assistance in tackling the societal consequences of gambling, may be found at www.gamcare.org.uk. Its confidential helpline is: 0845 6000 133. Non-UK residents can contact GamCare for details of International support organisations.

Gamblers Anonymous is a community of men and women who have grouped together to address their own gambling issue and to help other compulsive gamblers in doing the same. There are regional communities around the world. The Gamblers Anonymous international service site is at: www.gamblersanonymous.org.uk.

Gambling Therapy offers help and counseling to anyone who has been harmed by gambling. Members of the Gambling Therapy Team operates from locations both within the UK and internationally. Its site can be accessed at: www.gamblingtherapy.org.

If you are a parent or a Guardian sharing access with Minors, Parental control tools are recommended including but not limited to Net Nanny (www.netnanny.com), GamBlock (www.gamblock.com) and CyberSitter (www.cybersitter.com)