



Osmila N.V.

Social Responsibility – Responsible Gambling Policy

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Definitions

"CGA" means Curacao Gaming Authority.

"Cooling Off" means a pre-determined period that can comprise hours, days or months which is set by the player during which time the player may not place any wagers whatsoever.

"Games of Chance" means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker.

LOK is the National Ordinance on Games of Chance law of Curacao.

"Marketing, promotion and advertising" refer to all resources, messages and media that promote the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns.

"Mandatory Requirements" are the basic elements of a Responsible Gaming policy that must be implemented by all operators. These elements must reflect the target markets and players of the operator.

"Minor" means any person under the age of 18.

"Self-exclusion" is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator.

"Vulnerable Person" is defined in the Clause 1.1 (h) of the LOK as:

1. Under eighteen years of age.
2. Has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people.
3. Has been banned from playing any Game of Chance either by force or at his or her own request.
4. Has been declared bankrupt.

Section 1

1.1 Introduction and Policy Overview

In recent years the online gambling industry has seen an increasing emphasis of public opinion directed toward the prevention of gambling-related harm. The increase in online gambling sites and the ease of which these sites can be accessed and funded means more people have access to various forms of gambling which weren't available 10 to 15 years ago.

Osmila N.V. (OSNV or the Company) is committed to endorsing responsible gambling as well as promoting the awareness of problem gambling and improving prevention, intervention and treatment. This Responsible Gambling Policy sets out the Company's commitment to minimising the negative effects of problem gambling and to promote responsible gambling practices as well as addressing those requirements set out in the Curacao Gaming Authority's Responsible Gaming Policy for Licensed Operators as well as other regulations under which the company operates.

1.2 Regulatory Responsibilities

This policy defines the framework for how we handle customer interactions where we have concerns that a customer's behaviour may indicate problem gambling. The regulatory requirements are set out in the Curacao Gaming Authority's (CGA) Responsible Gaming Policy for Licensed Operators. In the following sections we outline how to identify customers who might be experiencing problems with their gambling (the signs of harmful gambling), and how we should interact to help them. It is also important that we conduct detailed profiling on these customers in order to determine how we interact with them

The policy's intended audience is all operational staff who interact with customers and the support teams that carry out customer data analysis and is fully supported by all senior management and the Board of Directors.

The following list details other codes and regulations that have been referenced in the writing of this document.

Codes:

- (a) IGRG Gambling Industry Code for Socially Responsible Advertising (the Industry Code).
- (b) Responsibility and problem gambling Advertising Guidance (CAP Guidance)
- (c) Protecting children and young people (CAP Guidance)
- (d) UK GC Licence Conditions and Codes of Practice (LCCP)

Regulations:

Research and reference papers:

- (a) Gambling behaviour in Great Britain in 2015 (NatCen, 2017)

- (b) Responsible Gambling: Collaborative Innovation (Revealing Reality, 2017)
- (c) Getting Grounded in Problematic Play (Jonathan Parke and Adrian Parke, 2017)
- (d) Remote Gambling Research (PWC, 2017)
- (e) RGSB Evaluation Protocol (RGSB, 2016)
- (f) Office for National Statistics household income data (ONS, 2017)

The Responsible Gaming Policy for Licensed Operators as issued on April 17, 2025 by the Curacao Gaming Authority (hereafter: 'RG Policy CGA') sets out various obligations which must be adhered to. As part of the RG Policy CGA, the Company will prominently display:

- (g) The license details through the dynamic seal on the page(s);
- (h) A sign which indicates that under-age gaming is prohibited;
- (i) A 'responsible gaming' message, explaining that gaming can be harmful if it is not controlled, and information about the Customer support measures;
- (j) A direct link leading to the responsible gaming section which includes all relevant responsible gaming information required by the CGA;
- (k) A direct link which enables Customers to refer to one or more gambling support organisations;

Lessons learnt:

Copies of reports on those companies who have been identified as having compliance failings especially those related to social responsibility are regularly published by the regulatory bodies such as the UK GC. Rather than seeing these publications as just a name and shame exercise, the information contained in the reports provides a valuable insight into how we can learn by others mistakes in order to strengthen our own procedures.

Section 2

2.1. Responsible Gambling

Responsible gambling involves the conduct of gambling in a manner where the potential for harm associated with gambling is reduced.

The Company respects the rights of our Customers to enjoy our services and to take responsibility for their own conduct but also acknowledges the duty to our customers to provide them with appropriate information that may assist them to manage their gambling. As a general principle no credit shall be offered to customers for the purpose of wagering.

The Company's aim is to ensure that customers make informed decisions about gambling and that if the customer requires assistance, to facilitate access to gambling help services.

2.2. Customer Responsible Gambling Tools

As a socially responsible gambling operator, OSNV endeavors to provide a safe and secure gambling environment for all its customers. OSNV is aware that customers may have, or may develop, problems when it comes to gambling due to addiction, a change in personal circumstances or some other reason.

In order to assist customers in firstly protecting themselves the following is available to them on any of the Company's licensed websites.

2.2.1. Underage Gambling

The following tools assist with ensuring no one under 18 years can gamble on our licensed gaming websites:

- All potential customers must disclose date of birth on registration (no-one under 18 can complete registration);
- All potential customers are required to confirm via a check box during registration to verify they are not a minor;
- ID validations are also required as outlined in the company's AML/ ACFT Manual on all new account registrations;
- All customers have secondary checks against a 3rd party identity verification database to confirm they are 18 and not a minor.

If at any point an account is identified as being registered by a minor the account will be closed immediately. Our obligations as an operator would be to refund any deposits, forfeit any winnings and communicate clearly the reason for the account suspension.

Records shall be kept of all accounts tagged as under aged; see 5.2.3.

2.2.2. Player Protection Tools

The following tools are available during the sign-up process and accessible via the Player Account at all times:

- **Deposit Limits** – The customer can set deposit limits by time period (daily, weekly, monthly) and amount. The default setting is for max deposit of XCG. 7,250 or €3,580;
- **Staking Limits** – The customer can set staking limits by time period (weekly, monthly) and limit type (total stakes or number of bets);
- **Time Out** – The customer can temporarily exclude from gambling by time period (1 day, 1 week, 1 month, 6 weeks);
- **Self Exclusion** – The customer can self exclude from gambling by time period (6 months, 1 year, 2 years, 5 years, permanent).

2.2.3. Responsible Gambling Web Page

On all pages within OSNV licensed websites there is a link to a Responsible Gambling page which clearly outlines information for the customer on the following:

- Self-Assessment
- Keeping Control
- Managing Limits
- Access to Customer History
- Time Out
- Self-Exclusion
- Under Age Gambling
- Parental Controls
- How to contact us regarding any Responsible Gambling Help and Advice

2.2.4. Responsible Gambling References in Terms and Conditions

All Terms and Conditions have a section on Responsible Gambling with links to the Responsible Gambling page which outlines the various tools available to the customer, their functionality and how they are to be used.

2.2.5. 3rd Party Assistance

On all pages with the OSNV website there are links to the following 3rd party entities to assist with Problem Gambling:

- Be Gamble Aware www.gamcare.org.uk

- Responsible Gambling Trust www.gamblingtherapy.org/en/responsible-gambling-trust
- Gamstop www.gamstop.co.uk
- Gamblers Anonymous

2.2.6. 3rd Party Responsibility

The Company shall make any contracted third-party aware of their Responsible Gaming Policy and require them to adhere to it.

The Company is accountable for materials provided to affiliates, representatives, sponsorship, ambassadors social media influences, including wordings and visuals representations, in case these influencers actions and/ or statements pertain to paid placement of advertisements.

Any Customer who is currently under a period of self-exclusion (cooling off) or a permanent exclusion due to problem gambling, will be removed from all marketing correspondence lists. No marketing or promotional materials is to be sent to excluded Customers.

Section 3

3.1. Identifying At-Risk Customers

Those customers who may be experiencing, or at risk of developing, problems with their gambling are often referred to as being **"at-risk customers"**. **"Problem gambling"** is gambling that causes harm or may cause harm. Sometimes the harm may result from just one gambling session. In other cases, it might be the result of regular gambling sessions over a period of time and involving substantial amounts of money. The harmful effects of problem gambling can include –

- Financial problems
- Problems at work (ranging from poor performance to fraud)
- Poor parenting and other relationship problems
- Family violence
- Alcohol abuse
- Mental health problems.

The definition of **"harm"** is very broad, including personal, social and economic harm. It is not confined to an individual – others can and do suffer **"harm"** as a result of a person's gambling.

"Harm" –

- (a) Means harm or distress of any kind arising from, or caused or exacerbated by, a person's gambling; and
- (b) Includes personal, social, or economic harm suffered –
 - i. By the person; or ii. The person's spouse, partner, family or wider community; or iii. In the workplace; or iv. By society at large.

When we talk about **"indicators of harm"** or **"harmful behaviour"**, we mean behaviour or activity which could indicate that someone is experiencing, or at risk of developing, problems with their gambling rather than focusing on the actual individual (the problem gambler). **Harm prevention** is what we all in the industry are trying to achieve by making gambling safer so that fewer people engage in problematic behaviour in the first place.

3.1.1. Advertisement activities

The Company shall engage in responsible advertising. According to the LOK, The Company must ensure that its marketing and advertising activities, including the offering of bonuses:

- do not encourage excessive gaming.
- are not misleading, thus e.g. do not portray gaming as an investment, misrepresent skills vs games of chance as mentioned in the CGA RG Policy.
- do not target Vulnerable persons.

All advertisement done by the Company or third parties hired by the Company will include a clearly visible Responsible Gaming message or slogan.

3.2. Predictive Markers Or Triggers

As a socially responsible gambling company we have a duty of care towards our customers to ensure we provide a safe environment where they can gamble responsibly, providing the tools they can use in order to control their level of spending. Also by monitoring their gambling behaviour we identify the indicators of harm and intervene to provide the necessary help and guidance.

The following section outlines:

- (a) the potential indicators of harm and those indicators currently being used to assess at-risk customers using a risk-based approach;
- (b) who is responsible for monitoring for these triggers and
- (c) how are identified cases escalated in order to achieve early interaction in order to recommend practical applications of harm mitigation.

3.2.1. Time Indicators

Duration and Time a Customer Spends Gambling:

The following are time indicators of harm:

- **Customer session durations** lasting more than two or more hours or gambling late at night and into the early hours of the morning have been identified as a common denominator amongst problem gamblers.
- **Time of day** for a customer, such as during work hours, especially if we know a customer has a regular job (information gained from KYC checks), might also indicate problematic behaviour and therefore combinations of duration and timing of sessions need to be analyzed.
- **Frequency of a customer gambling.** Is the customer gambling excessively frequently?

3.2.2. Spend Indicators

Significant Transactional Patterns:

The following are spend indicators of harm:

- **Deposits** (frequency of deposits, in session deposits, use of multiple payment methods etc)
- **Withdrawals** (e.g. changes in withdrawal patterns and reversal of withdrawals which might indicate loss chasing)
- **Qualifying Payments** (How quickly a customer reaches this trigger and whether it was via a one off deposit or in a number deposits made over a short period)

- **High Risk triggers** (How quickly a customer reaches this trigger and whether it was via a one off deposit or in a number deposits made over a short period)

3.2.3. Account Indicators

Significant Betting Patterns:

The following are account indicators of harm:

- **Staking levels** – spend that goes beyond an identifiable norm for that customer
- **Volume of gambling** – spend that goes beyond an identifiable norm for that customer
- **Erratic betting patterns** – does the customer bet on an excessive number of sports and bet types?
- **Use of responsible gambling tools** - does the customer make use of the time out, deposit limits functions. Do they have a history of self-exclusion with us?
- **Customer initiated contact** - frequent interactions, increased complaints, frequent bonus requests or requests for bonuses after losses, comments/hints of PG in live chat, signs of distress
- **Cancelled withdrawals** – does the customer frequently cancel their withdrawals?
- **Failed deposits** – has the customer tried to deposit frequently and had the transactions fail?
- **Self Excluded with other operator** – Use of third party software such as Iovation to check whether a customer has initiated SE with other gambling operators,
- **Multiple payment methods** – does the customer use multiple payment methods?

3.2.4. Other Indicators of Harm

Conflicting Account Behaviour:

The following are additional indicators of harm:

- **Chasing losses** – does the customer chase their losses by increasing volume of bets, placing bets on very low odds, looking for perceived guaranteed wins and/or increasing their staking size?
- **KYC documentation evidence** – a customer might submit bank statements with large number of deposits to a number of other gambling operators or submit copies of loan company documents as part of their KYC submissions;

- **Big win** - does the customer start high staking following a win?
- **High Value players** – should be treated the same as any other customer and the same triggers need to apply;
- **Limited Income** – is the customer on some form of government benefit or owes money to debt collectors?

3.3. Operational Responsible Gambling Checks

OSNV endeavours to offer a safe and secure environment for a customer to use our products. With that in mind the Company takes a risk-based approach to responsible gambling and therefore the following are the responsible gambling checks undertaken by staff and department responsibility of such checks in order to identify potential at-risk customers:

3.3.1. Deposit Behaviour

The following are indicators checked by the Fraud Team orientated around deposits:

- **Single Deposits** – Has the customer made a single deposit equivalent or in excess of XCG. 4000 or €2,000.
- **Single Credit Card Deposits** – Has the customer made a single deposit equivalent or in excess of XCG. 725 or €350.
- **Monthly Deposits** – Has the customer made deposits over a rolling 30-day period equivalent or in excess of XCG. 4000 or €2,000 and XCG.30,500 or €15,000.
- **Aggregate Deposits** – Has the customer deposited equivalent or in excess of XCG.101,950 or €50,000/ XCG.203,900 or €100,000 / XCG.305,900 or €150,000 over the lifetime of their gaming
- **Transaction Volume** – Has the customer made 3x deposits of XCG. 725 or €350 within a 24 hour period.

3.3.2. Betting Behaviour

The following are indicators checked by the Sportsbook Team orientated around betting activity:

- **Lifetime Staking** – Has the customer staked in excess of XCG.101,950 or €50,000 over the lifetime of their gambling.
- **Daily Staking** – Has the customer staked in excess of XCG.2,050 or €10,000 in any single 24hour period.
- **Daily Loss** – Has the customer lost in excess of XCG.4,000 or €2,000 in any single 24-hour period.

- **Average Bet Size** – Is the customer's average bet size in excess of XCG.1,200 or €590.
- **Bet Variations** – Does the customer place any bets significantly higher than their Average Bet Size.

3.3.3. Interactive Behaviour

The following are indicators checked by the Customer Support Team orientated around interactions with CS and use of customer RG tools:

- **CS Contacts** – Has the customer made references to PG in communications, showed signs of stress, increased complaints/contacts and/or requested bonuses.
- **Time Outs** – Has the customer previously timed out.

3.3.4. Reality Checks

Customers shall be able to receive and see on the screen a reality check within a gambling session. A reality check notifications offers the Customer the option to exit the gambling session e.g. log out.

3.3.5. Duplicate Accounts

The company will take measures in order to prevent Customers from opening duplicate accounts on the Website, which measures will be further detailed in version 1.3 in accordance to the implementation schedule of the Responsible Gaming policy CGA.

3.3.6. Bonus Conditions

As bonuses are regarded by the CGA as advertisement activities, they fall under responsible advertisement conditions under the LOK and the CGA RG Policy.

Therefore, the Company will communicate to the Customer the terms and conditions of any bonus and/or promotion clearly. Furthermore, the Company is committed to not use any bonus to encourage excessive gaming.

Section 4

4.1 Self- exclusion

Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. The Company offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want our assistance to help them stop.

The self-exclusion request shall be applicable:

- (a) To all brands/domains operated under the Company;
- (b) All gambling activities related to one Casino vertical available on the Company's domain. If such option is provided by the Company to the Customer, as otherwise the self-exclusion under A will be provided for all gambling activities of the Company¹;
- (c) All advertisement activities of the Company. An automatic opt-out will be triggered when self-exclusion is activated

The Customer should be able to set their preference for the duration of the self-exclusion period online, without requiring email communication or prior approval from the Company. Once this is set, all exclusions related to brands/domains, vertical gambling activities and advertisement activities automatically applies immediately.

Any wagering that takes place following the self-exclusion request and prior to it being into effect will be voided and the funds returned to the Customer.

The Company should not question a Customer's decision regarding self-exclusion in general, nor will the Company offer bonuses to the Customer to encourage participation, or delay/complicate the self-exclusion activation process.

If a self-exclusion is applied, the following actions should be in place:

- (a) The Customer's account is closed. The Customer can no longer log in.
- (b) The Customer must complete any tournaments that is in-running at the time of the self-exclusion.
- (c) Ante-posts bets will be voided and refunded subject to AML/CFT regulations.²³
- (d) Contributions to progressive jackpots that were made by the Customer through gameplay prior to the self-exclusion request remain, but the Customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect.
- (e) No Advertisement activities shall be conducted towards the Customer.

¹ Casino verticals are types of groups wagering activity available on the domain of the online casino, such as casinos (i.e. slots, table games) and sports betting (i.e. horse betting)

²Ante post bets are those placed in advance of the opening of betting market for that event

- (f) Any payment method used by the Customer will be blocked by the Company for future use during the term of the self-exclusion period.

The Company will implement measures to prevent self-excluded Customers from creating new Customer's account under different credentials.

4.2 Customer Interactions

4.2.1. Early Interactions with customer on harmful behaviour

In order to get the responsible gambling message across to our customers as early as possible, all pages within the OSNV's website have links to the Responsible Gambling page which details information of problem gambling support centers as well as highlighting some of the indicators of harm associated with problem gamblers; see section 3.2.2.

All emails to customers should, where possible, contain Responsible Gambling information in the footer which includes information and where to seek help and support.

4.2.2. Interactions with customer showing signs of harmful behaviour

We understand each customer will react differently when approached about the topic of problem gambling, therefore the Responsible Gambling Team take a risk-based approach and handle PG interactions on a case by case basis.

Standard templates may be used where customers are flagged in other databases as having self-excluded. The customer will be asked for the reason for their self-exclusion. If the customer clearly responds with non-gambling problem answers then they will be asked if they are comfortable with their gambling. Only when we are satisfied that the customer isn't showing signs of potential harmful behaviour will they be allowed to bet with us.

We also use different risk thresholds which customers may reach as another prompt to interact with them. Customers will again be asked if they are comfortable with their level of gambling and further information may be discussed such as setting of limit functions if any answers are not clear.

After the self-exclusion period ends, the Customer must request in writing (by email or chat) the unblocking of the account. The reactivation of the account cannot be instigated by the Company by re-commencing communications with the Customer.

4.2.3 Operator Enforced Exclusions

An Operator Enforced Exclusion is a similar process to that of a customer self-exclusion, whereby the company has made a decision to enforce the responsible gambling tool on an account for either permanent or temporary validity.

There are a number of reasons that we would apply an Operator Enforced Exclusion but all would come under the umbrella of Social Responsibility and or Responsible Gambling and examples are given below;

- The customer has openly admitted to having been a problem gambler or gambling addict but will not self-exclude
- The customer has made threats to self-harm during contact with us
- The customer has exhibited multiple RG triggers such as declined deposits, chasing losses, several requests for a bonus etc.
- The customer has complained that we are responsible for their gambling addiction / problem, followed by a request for refunds of deposits
- For AML and or RG purposes the customer was asked to provide proof of funds and has failed to supply the necessary documentation
- We have been made aware of potential criminality from public domain information

Examples of where an Operator Exclusion may be applied

- During contact with our customer service team (Phone, Chat, Email) the customer made threats of self-harm due to being in financial difficulties. As he/she was not in a fit state of mind to choose to self-exclude, we applied an OE. The customer received support from the police following the call and thereafter Gamcare, following our interaction to him/her with advice and support.
- An account was tagged to have behavioural indicators (BI) during a SOF process, the investigation showed that the customer was living in social housing and had pay-day loans and also indication of being on social welfare. After discussion and further clarification from the customer, it was decided to exclude the account temporarily until such time that the customer could identify and evidence their SOF.
- Following a call, chat, email with CS, a review shows that the customer is constantly making contact and questioning the validity of the games on our site. When advised of the process, the customer accuses the company of theft and will not accept a legitimate answer whilst making accusations against staff and threatening to go to the regulator. After careful review of the customer's account multiple BI were noted alongside the above. Although an interaction was conducted the customer made no use of our RG tools. After discussion with the RGT it was decided to exclude the customer's account.

Section 5

5.1 Independent Organizations

The website of the Company will display the direct links to:

<https://gamblingtherapy.org/information/where-can-i-get-help/>

and /or

<https://www.gamcare.org.uk/self-help/links-to-other-support-agencies/international-support-contacts/>

and/or

<https://www.gambleaware.org>

as well as to specific names of organizations offering treatment options in case these are available in the target market of the Company. These links will be readily available on the footer of the website.

5.2 Evaluation

5.2.1. Ongoing Monitoring

The Sportsbook, Customer Support and Fraud teams shall perform on-going monitoring of all customer accounts in the OSNV site in order to evaluate customers activities against the indicators outlined in the above.

Customer's data shall be reviewed on a regular, and relevant (daily, weekly, monthly), basis in order to ensure any indicators triggered are identified and appropriately actioned.

The escalation procedure for the reporting of potential PG accounts is outlined as follows:

- Staff member runs relevant report over the relevant time period;
- Any customers meeting an indicator threshold are identified;
- Any identified customers have their activity reviewed;
- Contact is made with the customer to ensure they are comfortable with their level of gambling and references are made to the RG tools on the OSNV sites and groups that can assist if the customer feels they have a gambling problem;
- Action is taken after consultation with the Responsible Gambling Team (RGT) to either put the customer on an At-Risk list or as a last resort the customer's account is permanently closed.

5.2.2. Reporting Problem Gambling

The RGT shall be independent to any direct involvement with the various departments handling customer registration, betting activity, deposits and withdrawals and all staff have direct reporting access to the CEO regardless of rank or file.

Our dedicated Sportsbook, Customer Support and Fraud and Risk personnel are trained to spot the early signs of possible Problem Gambling (see Section 3). The RGT is responsible for the training of staff in such matters and reporting suspected problem gambling activity.

When problem gambling activity is identified the relevant member of staff shall report the incident directly to the RGT.

The RGT shall determine whether the identified behaviour, using the appropriate procedures and controls outlined throughout this document and investigating the information provided by the relevant staff member reporting the incident, shall take the appropriate action.

The RGT shall report to directors detailing any activity that has triggered any RG indicators during the year. The report shall also outline any measures taken to address these activities for the customers concerned.

5.2.3. Record-keeping

Customer account records, including any identity or due diligence documentation shall be maintained on the companies cloud servers with access restricted by department and role. Individual user password protection is required for network files.

Problem Gambling account related files are maintained by the transactions teams on the network and include :

- a. Records of identified under 18 account failures;
- b. Records of Minor accounts which required closer investigations;
- c. Records of frozen accounts.

Problem Gambling training records of employees who have undertaken training along with performance scores shall be maintained by the training department and include:

- a. Employee records of attendance of training both internal and external;
- b. Performance records;
- c. Training schedule.

The Annual Problem Gambling Compliance report prepared by the Compliance Officer for the Board and includes:

- a. Actual Problem Gambling identified cases as reported by the operation;
- b. Problem Gambling controls effectiveness and deficiencies in the processes and rectification measures to be implemented or already taken;
- c. Emerging risks to the company.

Retention of Records – as a minimum, records shall be retained for a period of 6 years after a Customer ceases to be an active Customer on our sites. Any Customer under investigation due to possible problem gambling activities and who is undergoing investigation, shall have their records retained until the relevant groups no longer require the Company to retain them.

Section 6

6.1 Compliance Culture

6.1.1. Staff Integrity and Positive Responsible Gambling Culture

All operational staff need to be made aware of OSNV social responsibility requirements operating under the CGA licence. We actively encourage responsible gambling on our site and as such we have developed training programs to help our teams identify at-risk customers, using processes and tools based on industry best practice to spot the signs of harmful behaviour available, who may have problems with their Gambling and the steps we can take to try and help them.

6.1.2. Staff Training

Our front-line staff need to be made aware that the Company encourages responsible gambling on our site and as such we have developed training programs to help them know how to advise customers to gamble responsibly and the tools available to do so.

All staff responsible for the running of the OSNV sites shall be given internal training and refresher training at least twice a year on methods of problem gambling. The training modules are designed and run by a dedicated training department who shall ensure staff are aware of:

- the provisions of the responsible gambling requirements;
- the requirements to adequately train all operational staff on our social responsibility requirements;
- training on the tools that we provide to customers in order for them to control their gambling;
- the recognition and handling of responsible gambling indicators;
- the company's policies and procedures to promote responsible gambling;
- training of our front-line staff to recognise customers with gambling problems and how they should interact with them.

Refresher training courses where possible will also be scheduled throughout the year to take into account new regulations and to raise employees' awareness. The Training Department shall ensure all details of the staff receiving training are recorded along with the dates that the training took place and any results of any test undertaken.

6.1.3. Compliance Monitoring

Internal audits are performed at regular intervals on the various departments related to the operations of the Company in order to review compliance to documented procedures. These audits not only serve as a measure of compliance but provide a continuous review of the company's policies and procedures.

A suitably qualified person has been appointed to act as the Chief Compliance Officer for the company. The Chief Compliance Officer shall ensure all staff comply with the approved policies, controls and procedures.

Appendix A

Responsible Gambling Roles and Responsibilities

Ternisa Bennett Responsible Gambling Manager Role

and Responsibilities:

- Management of the Responsible Gambling team.
- Coaching and developing team members, and day to day management of the department.
- Drive Responsible Gambling culture across all business areas to ensure a long-term and sustainable business for the company by ensuring that Responsible Gambling is an integral part of the daily operations.
- Proactively monitor and review players' accounts ensuring they are playing responsibly whilst meeting our regulatory requirements in their terms and conditions of play.
- Making informed decisions determining appropriate mitigation actions for any risk identified.
- Act as point of contact for escalations for Responsible Gambling cases and complaints.
- Plan and Implement key Responsible Gambling initiatives across the business.
- Responsible for delivery, implementation and monitoring of the Responsible Gambling Programme and its effectiveness.
- Proposing, developing and implementing new ideas to drive the business forward, whilst maintaining an exceptional level of customer service.
- Review internal policies and procedures to ensure that they are compliant with all statutory or legal requirements. Keep up to date with regulatory changes ensuring we are being compliant.
- Monitor best practice across our industry and suggest improvements to our strategies for the company as appropriate.
- Supporting senior managers in driving awareness and promoting responsible gambling across the business.
- Responsible for effective training framework and coordinating training of staff in gambling addiction behaviours, Responsible Gambling strategies and procedures.
- Recommending policies and procedures to enhance the effectiveness of Responsible Gambling programs.
- Support and manage the implementation across all customer areas of our Responsible Gambling Programme.
- Updating OSNV websites and other communications with relevant and timely content.
- Regular review and QA of Responsible Gambling processes to ensure compliance and adherence to our policies.
- Analysing information from a variety of sources to identify risky behaviour and prevent problem gambling.

Responsible Gambling Team consists of:

- Chief Compliance Officer (CCO) – **Nicholas Chappell**
- AML/CFT Compliance Officer – **Doriano Carotti**
- Responsible Gambling Manager - **Ternisa Bennett**

Roles and Responsibilities:-

Responsible for the oversight of all aspects of the Company's Responsible Gambling activities. The role includes the monitoring of the day-to-day operation of the Company's Responsible Gambling policies to ensure they are compliant with the regulations governing the Company's gambling licences.

The RGT reports directly to the CEO and has unhindered access to regulators and appropriate law enforcement agencies. The RGT has been assigned the ability to make responsible gambling decisions independently of any operational concerns and is responsible to ensure that a risk-based approach in the prevention of problem gambling is put into practice.

The RGT shall also engage with the company assigned Training Specialists in the preparation, management and delivery of training material for responsible gambling topics to all relevant employees. Working with the Training Specialists, the RGT is responsible for reviewing the effectiveness of the training material.

REVISION STATUS DETAILS:

1.5	Sep 2025	Updated with updated requirements of Curaçao Gaming Authority Policy of Responsible Gaming
1.4	May 2025	Updated with implementation of Curacao Gaming Authority Policy of Responsible Gaming
1.3	May 2024	Annual review
1.2	Apr 2023	Review and minor update
1.1	Mar 2022	Review
1.0	Mar 2021	Implementation

Next procedure review due in 29th of September 2026