

EGB Responsible Gaming Policy

Approved by the Board of Directors on April 25, 2025

Table of contents:

EGB Responsible Gaming Policy

1. Definitions
2. Scope
 - 2.1. Purpose
 - 2.2. Implementation
 - 2.3. Application
 - 2.4. Objectives
 - 2.5. Responsible Person
 - 2.6. Records and Reporting
3. Prevention of Underage Gambling
4. Customer Information and Accessibility
5. Problem Gambling Behavior Tracking
 - 5.1. Problem Gambling Indicators
 - 5.2. Customer Profiling
 - 5.3. Interventions
6. Self-control Tools
 - 6.1. Customer Self-assessments
 - 6.2. Cooling-off
 - 6.3. Self-exclusion
7. Limits
8. Marketing
9. Training of Team Members

1. Definitions

“Agreement” means EGB Terms and Conditions, a binding agreement between EGB and a Customer.

“EGB” means Exedra N.V., an operator of online gambling website EGB.com, incorporated in Curaçao with company number 139149 whose registered address is at Groot Kwartierweg 10, Livestrong Building, Curaçao. Exedra N.V is a holder of Curaçao gaming license OGL/2024/1277/0496 issued by the CGA.

“CGA” means the Curaçao Gaming Authority.

“Cooling-off” means a temporary restriction on gambling set by the Customer.

“Games of Chance” means any game in which one or more Customers, 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 Customers’ insight or skill, with no possibility for Customers to significantly influence the outcome.

“Gambling” or “Gaming” means Customer participation in Games of Chance.

“LOK” means the National Ordinance on Games of Chance law of Curaçao.

“Marketing” means all materials, messages and media that promote and advertise the operator’s domain(s), brand(s), products, or services.

“Minor” means any person under the age of 18 or other minimum legal age in the Customer’s state, province or country of residence allowing them to participate in Games of Chance.

“Problem gambling behavior” means gambling behavior patterns that adversely affect a Customer or their family on a financial, physical, or emotional level.

“Responsible gaming” means practices, policies and behaviors to ensure that gambling remains a safe and enjoyable activity for Customers who choose to participate.

“Responsible Gaming Tools” means available to Customers or imposed by EGB deposit limits, Cooling-off tools, or Self-exclusion procedures.

“Self-exclusion” means a procedure in which a Customer voluntarily bans themselves from online gambling activities with EGB.

“Team Member” means employees, independent contractors, and outsourcers of the EGB group of companies.

“Vulnerable Person” means an individual who:

- to the EGB’s actual knowledge:
 - is under 18 years of age;
 - has a gambling disorder, i.e., a mental health diagnosis characterized by insufficient control over their gambling behavior, which may lead to addiction and cause harm to themselves or their family;
 - has been declared bankrupt; or
- has been self-excluded on EGB websites or banned from gambling by EGB based on responsible gaming grounds.

2. Scope

2.1. Purpose

This Policy outlines the principles, mechanisms, and tools adopted by EGB to ensure gambling remains a safe and enjoyable activity. It aligns with CGA requirements and mandates proactive steps to prevent problem gambling, protect vulnerable persons, and promote transparency.

2.2. Implementation

The following Sections of the Policy take mandatory effect as follows:

- a) All Sections not mentioned in a) - d) and Section 8 (in relation to Vulnerable Persons) - on April 25, 2025;
- b) Section 4 - on May 25, 2025;
- c) Sections 3, 6.3, and Section 8 (all other provisions) - on September 25, 2025;
- d) Sections 6, 6.1, 6.2 and 7 - on March 25, 2026.

2.3. Application

This Policy applies to all EGB group companies and Team Members.

2.4. Objectives

The main objectives related to responsible gaming that EGB has defined are:

- a) comply with the laws and regulations of the gaming sector in the jurisdictions where EGB operates;
- b) minimize the impacts of the business through risk analysis and mitigation strategies;
- c) foster internal awareness, ongoing instruction, and continuous training for Team Members;
- d) incorporate tools for preventing problem gaming into products and services, in compliance with current regulations;
- e) implement tools for monitoring Customer behavior and minimize potential issues;
- f) ensure that all marketing activities comply with applicable regulations;
- g) promote responsible gaming behaviors among Customers by adopting tools and technologies that support such practices;

- h) inform key stakeholders of responsible gaming activities through corporate communication contact points and annual reports.

2.5. Responsible Person

A person responsible for implementing and enforcing this Policy is appointed by EGB.

The Responsible Person shall provide an annual report to EGB's management team as to the effectiveness of the Policy and related operational procedure. This report shall provide recommendations to management as to any proposed operational or policy enhancements and encompass these main areas:

- a) training and raising awareness among Team Members;
- b) education and raising awareness among Customers;
- c) prevention and mitigation of problem gambling behavior;
- d) developing information campaigns on responsible gaming.

2.6. Records and Reporting

EGB keeps records of responsible gaming interactions, age verification, monitoring, identified risks, evaluation results, use of Responsible Gaming Tools, and mitigation actions as required by the LOK and by the CGA regulations.

Customers' interactions with the EGB websites are logged in information systems utilized by EGB. Customer communications with the support Team Members are kept within the helpdesk system utilized by EGB.

3. Prevention of Underage Gambling

EGB takes necessary measures to ensure Customers are not Minors.

During registration and before the first bet, age verification is conducted via self-attestation and confirmation through a checkbox.

A Customer's valid government-issued ID is checked before the first withdrawal. Secondary verification methods such as database checks, selfie verification, or payment validation may be used along with ID checks.

Document submission and checks are subject to the EGB AML / KYC policy.

If a Customer is found to be a Minor, EGB closes the Customer's account, voids any transactions at its discretion, returns any remaining balance unless the funds must be withheld or forfeited due to the Agreement or applicable laws, and terminates the Agreement with the Customer.

The EGB will retain records of all age verification process and their outcomes according to the EGB's record keeping obligations and for regulatory review by the CGA.

4. Customer Information and Accessibility

The EGB websites have a responsible gaming section (page). The link to this page is available from all pages of the websites.

The responsible gaming section (page) is referenced in the Agreement.

5. Problem Gambling Behavior Tracking

EGB uses automated means and manual analysis by its Team Members involved with the Customers to detect problem gambling behavior.

5.1. Problem Gambling Indicators

Problem gambling behavior indicators ("red flags") to be taken into consideration for Customers' behavior analysis include:

- a) Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session and risk patterns.
- b) Repeated failed transactions due to insufficient funds.
- c) Reversing withdrawals – Customers cancelling withdrawal requests multiple times.
- d) A pattern of inexplicable extended play sessions.
- e) Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation.
- f) Signs of emotional dependence on gambling, a loss of control over gambling, lying shown during communication with customer support.
- g) Frequent changes to Responsible Gaming Tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of Cooling-off period.
- h) Attempts to open multiple accounts to bypass deposit or loss limits.

When any Team Member observes a red flag in relation to responsible gaming, they must immediately report it to the Responsible Person, describing the situation and indicating the reasons why this is considered to be the case, in order to ensure that the information is described truthfully and completely. Once the Responsible Person has detected and verified the problem gambling behavior, they will communicate with the affected Customer, encourage them to take a break, and inform them of the available Responsible Gaming Tools. The Responsible Person will then make further decisions and take appropriate measures in each particular case in accordance with this Policy.

5.2. Customer Profiling

EGB performs Customer profiling on an ongoing basis and assess individual risk levels.

EGB determines the appropriate level of monitoring and intervention on a case-by-case basis depending on the risk level.

5.3. Interventions

EGB informs Customers identified as exhibiting problem gambling behavior of the Responsible Gaming Tools. In relation to such Customer a responsible Team Member:

- a) applies deposit limits;
- b) suspends the Customer's account pending further assessment and/or;
- c) permanently excludes the Customer (in cases of severe or persistent risk).

Interventions may not delay legitimate withdrawals.

6. Self-control Tools

6.1. Customer Self-assessments

Customers can access their gaming history for the past six months from their accounts. Customers may request information relating to earlier periods, which will be provided within 10 business days.

Customers are encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits, to identify early signs of problem gambling, and to make informed decisions about their gambling activity.

Customers are encouraged to use the Gamblers Anonymous test available at <https://gamblersanonymous.org/20-questions/>.

EGB encourages Customers showing risk to use Responsible Gaming Tools.

6.2. Cooling-off

A Customer may activate a Cooling-off period, during which they are temporarily restricted from gambling activity. Cooling-off period may be applied to:

- a) Restriction of all gambling activities, and/or
- b) Opting out of marketing.

A Customer can set up the Cooling-off period for 24 hours, 7 days, 1 month, or 3 months.

The restrictions take effect immediately once selected and confirmed (if 1- or 3-months period selected) by the Customer.

During the Cooling-off period the Customer's account remains accessible. The restriction does not affect the Customer funds availability for withdrawal.

During the Cooling-off period EGB will not offer bonuses, free play, or incentives to the affected Customer.

After the Cooling Off period expires the selected restrictions are automatically lifted, with no further action required from the Customer.

6.3. Self-exclusion

A Customer may self-exclude from all gambling activity and marketing.

A Customer can self-exclude in their account at least for 12 months and up to lifetime.

The self-exclusion request shall be applicable:

- A. To all brands/domains operated under the EGB;
- B. All gambling activities related to one Casino vertical available on the EGB's domain. If such option is provided by the EGB to the Customer, as otherwise the self-exclusion under A will be provided for all gambling activities of the EGB¹;

The restrictions take effect immediately once selected and confirmed by the Customer to ensure that the Customer is aware they have chosen to self-exclude and understands the consequences of this decision.

The Customer must complete any tournaments that is in-running at the time of the self-exclusion. Ante-posts bets will be voided and refunded subject to AML/CFT regulations. 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.

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

Once the Customer self-excludes, their account is blocked. Once activated, self-exclusion is irreversible and irrevocable for the selected duration. A request to revoke the exclusion may only be submitted either within 24 hours of activation or after a minimum of 12 months has passed since its commencement.

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. horsebetting)

Self-excluded individuals are prohibited from creating new accounts. Any such attempt will constitute Prohibited Practice under the Agreement.

If EGB suspects that duplicate accounts for the self-excluded Customer exist or have been opened, such accounts will be blocked or closed and other measures will be taken according to the Agreement.

Any payment method directly known to have been used by a self-excluded Customer will be blocked for future use during any exclusion period to prevent circumvention of restrictions.

Self-excluded Customers are removed from EGB's marketing mailing lists.

After the self-exclusion period ends, the Customer must request in writing (by email, chat or other communication with the support team) the unblocking of the account.

The operator may exclude a Customer at its own discretion if the Customer displays problem gambling behavior.

7. Limits

Customers can set deposit limits per day, week, or month. Once a deposit limit is reached, the Customer will not be able to deposit additional funds until the specified period resets.

The Customer can manage the limit. Increases to limits take effect after 24 hours; decreases are immediate.

Active bets or tournaments are unaffected, but further play is blocked.

8. Marketing

EGB designs and structures its marketing campaigns taking into account the following principles:

- a) No direct targeting of Vulnerable Persons.
- b) No Minors used in marketing campaigns to promote gambling.
- c) No portrayal of gambling as an investment.
- d) No suggestion that skill can influence the outcome of games that are purely based on chance.
- e) No portrayal of gambling as a substitute for financial, emotional, or mental well-being.
- f) No featuring minors or depicting them engaging with gambling content.
- g) All advertisement done by the EGB or third parties hired by the EGB will include a clearly visible Responsible Gaming message or slogan.
- h) No content involving sex, drugs, or alcohol.
- i) Bonuses and promotions are communicated transparently with clear terms and conditions.
- j) No use of bonuses to encourage excessive gambling.
- k) Marketing materials must include a responsible gaming message.

- l) Third parties involved in marketing by EGB must follow the provisions of this Section.

9. Training of Team Members

All newly onboarded Team Members will receive training on the EGB's responsible gaming program during "new hire orientation". This general training will include understanding the difference between responsible gaming and problem gambling, education on preventing underage gaming and identifying and managing problem gambling behavior.

Team Members who interact with Customers or are involved in marketing receive additional responsible gaming training on a periodic (at least annual) basis and appropriate to their roles.

Periodic refresher training is delivered by the Responsible Person or through function-specific courses of varying depth. The training content is updated regularly, at least annually. Some elements of the training are interactive. For example, interactive training could include live, online training, role-playing, face-to-face training, user-led content, etc.

Team Members that are directly involved with Customers receive specialized instruction to

- a) recognize signs of risky behavior,
- b) apply appropriate intervention strategies, and
- c) provide guidance to the Responsible Gaming Tools.

Marketing and communication Team Members must adhere to this Policy to ensure all marketing activities align with responsible gaming principles.