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1: Introduction

1.1 Purpose of the Policy

This Responsible Gaming Policy sets out the principles, controls, and procedures adopted by Elfy Interactive B.V., a company licensed under the Curaçao Gaming Control Board, to ensure that all gambling activities are conducted responsibly, transparently, and in alignment with international best practices. The policy provides a framework for safeguarding players, reducing gambling-related harm, and promoting gambling as a form of leisure rather than a financial strategy.

The purpose of this policy is to:

- 1) Comply with the obligations under the National Ordinance on Offshore Games of Hazard (NOOGH, 1993).
- 2) Follow recognized responsible gambling standards such as those of the Curaçao Gaming Control Board.
- 3) Establish operational and ethical standards that promote player protection, fair play, and sustainable business practices.

1.2 Scope of the Policy

This policy applies across all operations, platforms, and domains under the license of Elfy Interactive B.V., including but not limited to:

winover.com, otobet.com, betewin.com, rigobet.com, casinoda.com, betpin.com, beinbet.com, jackpotz.com, jokeras.com, slotin.com, sortebet.com, azerbet.com, casimo.com, winspin.com and betim.com

It extends to all types of gaming services offered by the company: online casinos, sports betting, lotteries, live dealer games, crash games, bingos, and betting exchanges.

The policy is binding for:

- All registered players and users of the platforms.
- All employees, agents, and contractors of Elfy Interactive B.V. who interact with customers or manage gaming operations.
- Business partners involved in marketing, technology, and payment services.

1.3 Our Ethical Position

Elfy Interactive B.V. recognizes that gambling, while a legitimate and licensed form of entertainment, carries potential risks. The company accepts its duty of care to prevent minors and vulnerable persons from gambling, to provide transparent and fair services, and to mitigate the risk of gambling addiction.

We do not consider responsible gaming a regulatory burden, but a core value embedded in our business culture. Our approach balances commercial success with player protection, ensuring sustainability of both our customer relationships and our license.

1.4 Regulatory Foundation

The policy is grounded in:

- Curaçao's regulatory framework under the NOOGH Ordinance.
- Curaçao Gaming Control Board's requirements for player protection, fair play, and anti-addiction measures.
- International Gambling Commission regulations, particularly the UK Gambling Commission's Licence Conditions and Codes of Practice (LCCP), which are regarded as global best practice in responsible gaming.

1.5 Policy Objectives

Through this Responsible Gaming Policy, Elfy Interactive B.V. aims to:

1. Prevent gambling-related harm by providing effective tools and controls for players.
2. Protect children and vulnerable persons from gambling.
3. Promote transparency and fairness in all gaming services.
4. Ensure that marketing and advertising practices are socially responsible.
5. Train employees to recognize and respond to signs of problem gambling.
6. Cooperate with recognized problem gambling support organizations to direct players to professional help where necessary.
7. Continuously monitor, evaluate, and improve responsible gaming measures.

1.6 Policy Governance

The Responsible Gaming Policy is developed and maintained by the Compliance Department of Elfy Interactive B.V., under the authority of the Board of Directors. The Compliance Officer/MLRO has responsibility for implementation, monitoring, and reporting to regulators.

Regular audits and policy reviews will be conducted to ensure compliance with evolving regulatory standards and emerging risks.

2: Our Commitment to Responsible Gaming

2.1 Core Philosophy

At Elfy Interactive B.V., we believe that gambling should always remain an enjoyable and voluntary leisure activity. While the majority of players engage responsibly, we recognize that a minority may experience difficulties that could lead to financial, social, or psychological harm.

Our commitment is to ensure that our platforms never contribute to such harm. This is achieved by embedding responsible gaming principles into the very fabric of our operations: game design, player interaction, customer service, compliance monitoring, and staff training.

We take a “safety-first” approach, meaning that where a conflict arises between commercial interests and player protection, player welfare shall take precedence.

2.2 Alignment with International Standards

Elfy Interactive B.V. aligns its responsible gaming commitments with:

- Curaçao Gaming Control Board standards under the NOOGH Ordinance (1993), which obliges operators to safeguard players and prevent excessive gambling.
- International Gambling Commission (IGC) standards, particularly the UK Gambling Commission Licence Conditions and Codes of Practice (LCCP), which are widely regarded as global best practice.
- EU consumer protection and responsible gambling directives, which emphasize fairness, transparency, and harm minimization.
- Global Responsible Gambling Codes developed by organizations such as the European Gaming and Betting Association (EGBA) and the World Lottery Association (WLA).

By benchmarking against these frameworks, we ensure that our policy is not only compliant with Curaçao law but also competitive with Tier 1 regulatory environments.

2.3 Our Key Responsibilities

Elfy Interactive B.V. acknowledges the following responsibilities as fundamental pillars of responsible gambling:

1. **Preventing Underage Gambling** – ensuring no individual under the legal minimum age can access our services.
2. **Protecting Vulnerable Players** – providing tools, safeguards, and early intervention to support players at risk of harm.
3. **Promoting Transparency and Fairness** – guaranteeing fair play, open communication, and easy access to account histories and game rules.
4. **Ensuring Ethical Marketing** – avoiding misleading promotions, respecting vulnerable audiences, and always including responsible gambling messages in advertising.

5. **Providing Player Tools and Controls** – enabling players to set limits, self-exclude, or seek cooling-off periods.
6. **Collaborating with Support Services** – offering pathways to independent problem gambling organizations.
7. **Training and Empowering Employees** – equipping staff to identify and respond effectively to problem gambling indicators.

2.4 Commitment to Player Empowerment

We believe that informed players are responsible players. Therefore, Elfy Interactive B.V. commits to:

- Offering clear information about risks associated with gambling.
- Providing accessible, easy-to-use tools that allow players to control how much time and money they spend.
- Encouraging customers to make conscious choices, such as setting deposit limits before starting play.
- Educating players that gambling is not a way to earn money or solve financial difficulties, but a form of entertainment that should be enjoyed responsibly.

This approach mirrors international frameworks such as the “Gambling is for Fun” principles promoted in the UK and EU.

2.5 Balancing Business and Social Responsibility

As a licensed operator, Elfy Interactive B.V. understands that our long-term sustainability depends on responsible gaming practices. Unchecked gambling problems damage players, families, society, and ultimately the reputation of the industry.

Thus, our commitment is both a moral obligation and a business strategy:

- By protecting players, we build trust and loyalty.
- By complying with regulators, we safeguard our license and international reputation.
- By aligning with best practices, we position ourselves as a responsible and competitive global operator.

2.6 Accountability and Enforcement

Our commitment is enforced through:

- Policy governance by the Compliance Officer, reporting to the Board of Directors.
- Regular audits to test the effectiveness of responsible gaming measures.
- Data-driven monitoring to identify risky player behavior.
- Transparent reporting to regulators and stakeholders.

We are accountable not only to the Curaçao Gaming Control Board but also to our players, partners, and society at large.

2.7 Statement of Commitment

In summary, Elfy Interactive B.V. commits to:

- a) Upholding the highest international standards of responsible gaming.
- b) Ensuring gambling remains a positive form of entertainment.
- c) Protecting vulnerable groups from the risks of gambling harm.
- d) Continuously reviewing and improving our responsible gaming practices.

This commitment is not optional; it is central to our license, our culture, and our vision as a trusted operator in the global gaming industry.

3: Protection of Minors

3.1 Importance of Safeguarding Minors

Protecting minors from gambling is one of the most fundamental responsibilities of Elfy Interactive B.V. and a cornerstone of responsible gaming worldwide. Allowing underage individuals to access gambling products not only breaches Curaçao's legal requirements under the National Ordinance on Offshore Games of Hazard but also exposes young people to risks that can affect their development, finances, and long-term well-being.

Elfy Interactive B.V. acknowledges that gambling is an adult form of entertainment, suitable only for those who have reached the legal age of 18 years or the higher threshold set in certain jurisdictions. Our objective is to ensure that minors are never able to create accounts, deposit funds, or participate in any games on our platforms.

3.2 Age Verification and KYC Controls

The first and most effective measure against underage gambling is robust verification. Every player must undergo fully Know Your Customer (KYC) checks before being allowed to gamble for real money. This process requires submission of official identity documents such as passports, identity cards, or driving licenses, all of which must clearly confirm the individual's date of birth.

Accounts remain restricted until verification is completed. Where there is any doubt about the authenticity of documents or the accuracy of the information provided, additional checks are carried out. This ensures that minors cannot bypass safeguards by using false or borrowed details.

3.3 Technological Safeguards

In addition to document-based checks, technological systems are in place to detect and prevent attempts at underage play. These include automated database checks, duplicate account detection, and alerts for repeated failed registration attempts. Such systems strengthen our prevention framework and reduce the likelihood of minors slipping through manual checks.

3.4 Role of Parents and Guardians

We recognize that effective protection also requires cooperation from parents and guardians. To assist them, our websites provide clear information on how to safeguard home devices and accounts. We recommend the use of parental control software and internet filters that can block gambling-related websites on shared devices. Guidance is also provided on monitoring children's online activities and securing payment methods to prevent unauthorized use.

3.5 Breach and Enforcement

Despite strict systems, no process is entirely immune to attempted misuse. If we discover that an account has been created or used by a minor, it is immediately suspended and permanently closed. Any funds remaining on such accounts are managed in line with the Curaçao Gaming Control Board's rules, ensuring that minors do not profit from gambling activity.

Each incident is investigated to determine how it occurred and whether existing controls can be further strengthened. These investigations help us continuously refine our systems and reduce the risk of recurrence.

3.6 Training and Awareness

Employees are trained to remain vigilant for signs that may indicate underage gambling. Suspicious behavior such as hesitancy in providing documents, inconsistencies in account details, or unusual payment activity are carefully reviewed. Staff are empowered to escalate such cases to the compliance team for further action.

3.7 Commitment to Responsible Access

The protection of minors is not simply a compliance issue but a moral obligation. By combining robust verification processes, advanced technological tools, parental support, strict enforcement, and staff awareness, Elfy Interactive B.V. ensures that gambling remains an adult-only activity. This commitment safeguards vulnerable groups and supports our broader mission of promoting responsible and ethical gaming.

4: Preventing Gambling-Related Harm

4.1 Introduction

While most players treat gambling as a form of entertainment, a small but significant number may develop harmful behaviors that can lead to financial distress, strained relationships, and emotional difficulties. At Elfy Interactive B.V., we recognize our responsibility to minimize such risks and to create an environment where players remain in control of their gaming activities.

Our goal is not only to comply with regulatory requirements but to build a culture of prevention, early intervention, and support. By offering a range of tools and services, we enable players to make informed decisions and avoid excessive or harmful gambling.

4.2 Promoting Awareness

The first step in preventing gambling harm is education. All our websites provide clear information about the risks associated with gambling and guidance on how to play responsibly. We encourage players to treat gambling as a leisure activity rather than a means to make money.

Self-assessment resources are made available so that customers can reflect on their own behavior. These assessments are designed to help players identify early signs of risk, such as gambling longer than intended, chasing losses, or neglecting personal responsibilities due to gambling. By raising awareness, we aim to empower individuals to recognize potential issues before they escalate.

4.3 Player-Control Tools

To support safe play, we provide practical tools that allow customers to manage how much time and money they spend. These tools are easily accessible within account settings and include:

- **Deposit and loss limits** that can be set daily, weekly, or monthly, helping players stay within affordable boundaries.
- **Session time limits**, which remind players when they have been active for a prolonged period.
- **Reality checks**, delivered through notifications, showing how long a player has been logged in and how much they have wagered or lost during that time.
- **Cooling-off periods**, where players can take short breaks by temporarily suspending their accounts.
- **Self-exclusion options**, which allow players to block themselves from all platforms operated by Elfy Interactive B.V. for longer periods, up to permanent exclusion.

These measures are designed to give players control and reduce the risk of losing track of time or money while gambling.

4.4 Monitoring and Early Intervention

Beyond player-driven tools, Elfy Interactive B.V. also monitors gaming behavior to identify signs of risk. Our systems analyze patterns such as frequent deposits after losses, unusually long playing sessions, or repeated requests for higher limits. When such indicators are detected, our responsible gaming team may

contact the customer to offer guidance, remind them of available tools, or recommend a break from gambling.

Where necessary, we may apply restrictions directly, such as imposing limits or excluding the player, in order to protect their well-being. This proactive approach demonstrates our commitment to early intervention rather than waiting until problems become severe.

4.5 Support and Assistance

For players who feel they may be losing control, we provide direct links to professional support organizations such as GamCare, Gambling Therapy, and Gamblers Anonymous. These independent services offer confidential counselling and guidance for individuals experiencing gambling-related harm.

Our customer support staff are trained to handle sensitive conversations with empathy and discretion, ensuring that players are guided towards appropriate resources without judgment.

4.6 Staff Training and Responsibility

Preventing gambling-related harm requires a coordinated effort across the organization. All staff members, especially those in customer service and compliance, receive training to recognize potential indicators of problem gambling. They are taught how to approach players who may be at risk, how to escalate cases internally, and how to balance customer care with regulatory obligations.

This training is regularly updated to reflect new research, regulatory expectations, and emerging risks, ensuring our team remains prepared to address problem gambling effectively.

4.7 Commitment to Harm Minimization

Elfy Interactive B.V. treats the prevention of gambling harm as a continuous process. By combining education, player empowerment tools, Behavioral monitoring, and external support, we create a multi-layered system of protection. Our approach reflects international best practices, ensuring that gambling remains a safe and enjoyable form of entertainment for all players.

5: Transparency and Fair Play

5.1 Introduction

Transparency and fairness are fundamental pillars of responsible gaming. At Elfy Interactive B.V., we believe that players must be fully informed about how our games work, what their chances of winning are, and how their personal data and funds are handled. We also recognize that fairness is not only about the technical integrity of our games, but also about the clarity of the information we provide, the honesty of our marketing practices, and the openness with which we handle player concerns.

This chapter outlines how we ensure that every interaction with our platform is transparent, fair, and trustworthy, so that players can make informed choices and enjoy our services with confidence.

5.2 Clear and Accessible Information

From the moment a player registers, we ensure that all key information is available in plain language and in a format that is easy to understand. This includes terms and conditions, bonus rules, withdrawal procedures, privacy notices, and responsible gaming tools.

We avoid hidden clauses or complex wording. Players are informed about the rules of every game, the functioning of random number generators (RNGs), and the return-to-player (RTP) percentage of each product. Bonus offers are always presented with their full terms, including wagering requirements, time limits, and any restrictions.

By making this information visible and comprehensible, we empower players to make decisions based on facts rather than assumptions.

5.3 Fairness of Games

All games offered by Elfy Interactive B.V. are designed and tested to ensure they are fair, random, and compliant with international gaming standards. We use certified random number generators that guarantee unpredictable outcomes in every game round.

Before a game is released on our platform, it undergoes rigorous testing by independent laboratories accredited under recognized jurisdictions. These laboratories verify the integrity of the RNG, the accuracy of the game logic, and the correctness of payout tables.

Regular audits are conducted to ensure ongoing compliance, and the results of these certifications are available to regulators and, where appropriate, to the public. This commitment ensures that players can trust that every game is free from manipulation or bias.

5.4 Responsible Marketing and Communication

Transparency also extends to the way we communicate with current and potential players. We ensure that all advertising and promotional content is honest, responsible, and not misleading.

We avoid language that suggests gambling is a guaranteed way to make money or that implies that skill can influence outcomes in games of chance. We do not target vulnerable groups, including minors, individuals showing signs of problem gambling, or those who have self-excluded.

Our marketing materials always include responsible gaming messages and links to support tools, demonstrating that entertainment, not exploitation, is the core of our communication strategy.

5.5 Protection of Player Funds and Data

Fair play includes protecting the assets and information of our customers. Player funds are held in segregated accounts, separate from operational accounts, ensuring that customer balances are safeguarded even in the event of financial difficulty.

We also take data protection seriously. All personal and financial data is handled in accordance with applicable data protection laws, including the General Data Protection Regulation (GDPR). Secure encryption methods, multi-factor authentication, and restricted access controls are used to protect customer accounts and transactions.

By safeguarding both the money and the identity of our players, we uphold the highest standards of fairness and accountability.

5.6 Complaint Handling and Dispute Resolution

Transparency requires that players know how to raise concerns and how those concerns will be addressed. Elfy Interactive B.V. provides a clear and accessible complaints process. Players can submit complaints through customer support channels, and all complaints are handled in a structured, timely, and respectful manner.

If a player is not satisfied with the outcome of an internal review, we cooperate with approved alternative dispute resolution (ADR) bodies or mediators, in line with our licensing obligations. We ensure that the entire process is fair, impartial, and fully documented.

This system reinforces our commitment to treating every player fairly and to resolving issues transparently.

5.7 Commitment to Ongoing Transparency

Transparency and fairness are not static obligations. As technology, regulations, and customer expectations evolve, so do our practices. We regularly review our policies, update our communication materials, and audit our games and systems to ensure continued compliance and clarity.

We also welcome feedback from players, regulators, and industry bodies to improve our standards. Our mission is to create a platform where players not only feel entertained but also respected, protected, and well-informed.

6: Protection of Minors

6.1 Introduction

Protecting minors from gambling is one of the most important responsibilities of Elfy Interactive B.V. Our license requires strict compliance with age restrictions, but our commitment goes beyond legal obligation it is a moral duty. We recognize that gambling activities are designed exclusively for adults, and any involvement of minors poses significant risks of harm.

This chapter sets out the policies and measures we use to prevent underage gambling, the systems in place to verify player identity, and the collaborative steps we take with parents, guardians, and wider society to safeguard young people.

6.2 Age Verification

No person under the age of 18 is permitted to open an account or participate in gaming on our platforms. To enforce this restriction, Elfy Interactive B.V. applies robust Know Your Customer (KYC) and Age Verification procedures.

Upon registration, all players are required to provide accurate personal information, which is verified through official documents such as passports, national ID cards, or driving licenses. Automated verification tools cross-check this data against trusted sources to ensure authenticity.

Where automatic verification is not possible, manual checks are conducted by trained compliance officers. In every case, an account remains restricted until the verification process is complete. This prevents minors from gaining access to games, even temporarily.

6.3 Monitoring and Detection of Underage Activity

Even after initial verification, we remain vigilant for signs of underage activity. Unusual usage patterns, inconsistencies in account details, or failed verification attempts trigger alerts for further review.

In cases where we have reason to believe that an account may have been opened or is being used by a minor, it is immediately suspended pending investigation. If underage use is confirmed, the account is permanently closed, and any funds deposited are returned to the original source of payment in accordance with regulatory requirements.

This proactive monitoring helps us ensure that no minor can bypass our safeguards.

6.4 Parental Controls and Awareness

We recognize that the protection of minors is not solely the responsibility of gambling operators; it also requires the involvement of parents and guardians. To support this, Elfy Interactive B.V. provides information and resources to help adults monitor and control access to gambling platforms.

We encourage the use of parental control software and website blocking tools to prevent minors from accessing gambling-related content. Educational materials are made available on our websites, highlighting the risks of underage gambling and the importance of responsible supervision.

By raising awareness among families, we extend our protection measures beyond our own platforms into the broader digital environment.

6.5 Marketing Restrictions to Protect Minors

Our marketing policies explicitly prohibit the targeting of minors in any form. Advertising materials are carefully designed to appeal only to adults and never to children or young audiences.

This means avoiding imagery, themes, or language that may be attractive to minors, such as cartoon characters, youth culture references, or exaggerated claims of success. Marketing campaigns are placed only in adult-oriented media channels, and strict safeguards are applied to prevent access by underage individuals.

By ensuring responsible communication, we minimize the risk of exposing minors to gambling content.

6.6 Collaboration and Continuous Improvement

Protecting minors is an evolving responsibility that requires cooperation with regulators, industry peers, and child protection organizations. Elfy Interactive B.V. is committed to collaborating with the Curaçao Gaming Control Board and other international regulators to ensure best practices are continuously applied.

We regularly review our age verification systems, adopt new technologies, and provide staff with ongoing training to remain ahead of potential risks. Feedback from regulators, parents, and advocacy groups is welcomed as a vital part of improving our protection measures.

6.7 Conclusion

By combining strict age verification, continuous monitoring, parental engagement, marketing restrictions, and collaboration with stakeholders, Elfy Interactive B.V. ensures that minors are safeguarded from exposure to gambling. Our goal is simple yet vital: gambling must remain an activity exclusively for adults, and our platforms will always be structured to enforce this principle without compromise.

7: Support Services and Resources

7.1 Access to Professional Support

Elfy Interactive B.V. ensures that players experiencing difficulties with gambling have access to professional support services. Links to recognized organizations such as GamCare, Gambling Therapy, and Gamblers Anonymous are available across all platforms. These organizations provide confidential counselling, guidance, and structured programs to help individuals regain control over their gambling behavior. Staff are trained to approach players with empathy and discretion, offering appropriate information and directing them to these resources when needed.

7.2 Player-Control Tools

All platforms provide tools that allow players to manage their gambling activity effectively. Players can set deposit limits, loss limits, and session time limits, giving them the ability to control the pace and scale of their gambling. Reality checks and reminders help players remain aware of their activity, while cooling-off periods and self-exclusion options offer mechanisms to temporarily or permanently suspend play if necessary. These tools are easily accessible and designed to be intuitive, so players can take proactive steps toward responsible gambling.

7.3 Monitoring and Intervention

Elfy Interactive B.V. monitors customer activity for patterns that may indicate harmful gambling behavior. Indicators such as repeated attempts to increase limits, prolonged sessions, or chasing losses trigger a review by the responsible gaming team. Staff are trained to engage with players constructively, informing them of available tools and suggesting professional support where appropriate. This early intervention helps prevent harm before it escalates and ensures that players receive timely guidance.

7.4 Collaboration with External Organizations

The company collaborates with external organizations and industry bodies to ensure our support services remain effective and up-to-date. By engaging with advocacy groups, treatment providers, and regulatory bodies, Elfy Interactive B.V. stays informed about emerging risks and best practices in player protection. This collaboration allows us to continuously improve the resources and guidance we provide, reinforcing our commitment to player welfare.

7.5 Empowering Players

The overarching aim of these measures is to empower players to make informed decisions about their gambling. By providing accessible tools, clear information, professional guidance, and trained support staff, we create an environment where help is readily available, and players can actively manage their engagement with our platforms. This approach reinforces the company's commitment to maintaining a safe, responsible, and sustainable gaming environment.

8: Staff Training and Internal Controls

8.1 Ensuring a Responsible Culture

Elfy Interactive B.V. recognizes that responsible gaming depends not only on systems and tools but also on a well-informed and vigilant workforce. All employees, particularly those in customer service, compliance, and product management, are trained to understand the principles of responsible gaming, the signs of problem gambling, and the company's policies and procedures.

Staff are encouraged to take ownership of player safety and to view responsible gaming as a core part of their role rather than an administrative obligation. This culture of responsibility is reinforced through regular communication from senior management and integration of responsible gaming objectives into performance frameworks.

8.2 Comprehensive Training Programs

Training is delivered through structured programs that combine classroom instruction, e-learning modules, and practical scenario-based exercises. Employees learn to identify potential gambling harm, respond appropriately to at-risk customers, and understand the regulatory obligations imposed by the Curaçao Gaming Control Board and international best practices.

Compliance staff receive additional training on monitoring tools, escalation procedures, and reporting requirements. They are equipped to assess player behavior, intervene when necessary, and document actions taken, ensuring that all interventions are consistent, professional, and auditable.

8.3 Internal Monitoring and Auditing

Internal controls are a critical element of responsible gaming at Elfy Interactive B.V. The company regularly monitors operational practices, including the effectiveness of age verification, self-exclusion processes, and the application of player protection tools.

Audits are conducted periodically to ensure adherence to internal policies and regulatory obligations. These reviews cover all aspects of the player journey, from account registration and deposits to gameplay behavior and withdrawals. Findings are used to refine processes, update staff training, and strengthen the overall framework of internal controls.

8.4 Escalation and Reporting Procedures

Clear escalation pathways are established to manage any instances of concern identified by staff. Employees are trained to recognize situations requiring escalation, such as suspected underage gambling, signs of problem gambling, or breaches of internal controls.

The Compliance Officer oversees the reporting of these incidents to senior management and, where necessary, to the Curaçao Gaming Control Board. Documentation of all actions taken ensures accountability and provides a transparent audit trail for regulatory review.

8.5 Continuous Improvement

Elfy Interactive B.V. is committed to continuous improvement in both staff capabilities and internal controls. Training programs are regularly updated to reflect changes in regulation, emerging risks, technological innovations, and best practices in the gaming industry.

Feedback from staff, players, and regulatory bodies is incorporated into policy reviews and training enhancements. By fostering a culture of learning and vigilance, the company ensures that responsible gaming measures remain effective, proactive, and aligned with international standards.

9: Responsible Marketing and Communication

9.1 Marketing Philosophy

Elfy Interactive B.V. recognizes that marketing plays a central role in attracting and retaining players. However, responsible marketing is essential to ensure that promotional activity does not encourage excessive gambling or target vulnerable groups. All campaigns, communications, and advertisements are designed to be honest, transparent, and aligned with the principles of responsible gaming.

The company's marketing philosophy prioritizes player protection over commercial objectives. Campaigns are evaluated not only for their effectiveness but also for their adherence to ethical standards and compliance with regulatory requirements set by the Curaçao Gaming Control Board and international best practices.

9.2 Advertising Standards

All advertising content is carefully reviewed to avoid misleading messages. Claims implying guaranteed winnings, skill-based outcomes in games of chance, or financial dependency on gambling are strictly prohibited. Marketing materials are designed for adult audiences, avoiding imagery, themes, or language that could appeal to minors or vulnerable individuals.

Advertising channels are selected to ensure that promotional messages reach appropriate audiences. Digital campaigns incorporate age-gating mechanisms where possible, and all media placements are reviewed for compliance with regulatory and internal standards.

9.3 Promotional Offers and Bonuses

Promotions, bonuses, and loyalty schemes are communicated in a clear and transparent manner. Terms and conditions, wagering requirements, eligibility criteria, and expiry periods are presented in language that is easy to understand. This ensures players are fully informed before engaging with any offer and helps prevent misunderstandings that could lead to harm.

Promotional campaigns also include responsible gaming messages, reminding players to gamble within their limits and providing links to self-help tools and support organizations. This integration reinforces the company's commitment to player protection alongside commercial activity.

9.4 Communication with Players

Communication extends beyond advertising and promotions. Regular notifications, emails, and messages sent to players are designed to be respectful, informative, and non-intrusive. The tone of communication emphasizes entertainment rather than financial gain and consistently includes reminders about responsible gaming tools and self-control options.

Feedback mechanisms are embedded within communications to allow players to express concerns, adjust preferences, or seek guidance. This two-way communication ensures transparency and strengthens trust between players and the company.

9.5 Monitoring and Compliance

Elfy Interactive B.V. monitors all marketing activities to ensure ongoing compliance with internal policies and regulatory requirements. Marketing campaigns are audited regularly, and any content that may be deemed misleading, harmful, or targeted inappropriately is corrected immediately.

The Compliance Officer reviews new initiatives and campaigns before launch to ensure they meet responsible gaming standards. Any violations are investigated, and corrective measures are implemented promptly to maintain the integrity of marketing practices.

9.6 Commitment to Ethical Promotion

Through ethical and responsible marketing, Elfy Interactive B.V. demonstrates its commitment to player welfare. Every campaign, communication, and promotional initiative is assessed through the lens of responsible gaming, ensuring that the company promotes its services responsibly while maintaining transparency, fairness, and trust.

10: Monitoring, Reporting, and Continuous Improvement

10.1 Monitoring Responsible Gaming Measures

Elfy Interactive B.V. understands that maintaining an effective responsible gaming framework requires continuous oversight. All player activity, including deposits, wagering patterns, session durations, and engagement with self-control tools, is monitored using sophisticated analytical systems. These systems are designed to detect behaviors that may indicate potential gambling-related harm, allowing early intervention before issues escalate.

Monitoring extends across all platforms and products to ensure consistency and comprehensive coverage. The goal is not to restrict responsible play but to identify patterns that suggest players may require support, guidance, or protective measures.

10.2 Internal Reporting and Escalation

Staff are trained to report any concerns related to player behavior, system anomalies, or potential breaches of responsible gaming policies. These reports are escalated to the Compliance Officer or designated responsible gaming team, who review each case and determine appropriate action.

Documented reporting ensures accountability and provides a clear audit trail. This structured approach allows the company to respond consistently to issues, maintain regulatory compliance, and provide evidence of responsible management when reviewed by the Curaçao Gaming Control Board or other stakeholders.

10.3 Regulatory Reporting

Elfy Interactive B.V. adheres to all reporting obligations under its Curaçao license. Reports regarding player protection measures, incidents involving underage or at-risk players, and any breaches of responsible gaming policies are submitted as required to the Curaçao Gaming Control Board.

Compliance with these regulatory obligations ensures transparency, supports the integrity of the company's operations, and reinforces trust with both players and regulatory authorities.

10.4 Continuous Review and Improvement

Responsible gaming is not static. Elfy Interactive B.V. regularly reviews its policies, systems, and procedures to ensure they remain effective and aligned with emerging international best practices. Feedback from players, staff, regulators, and industry partners informs these reviews, enabling ongoing refinement of tools, interventions, and training programs.

Technological advancements are also incorporated to enhance monitoring capabilities and the effectiveness of player protection measures. By continuously improving our approach, the company ensures that responsible gaming measures evolve alongside the business and the wider regulatory landscape.

10.5 Fostering a Culture of Accountability

The commitment to responsible gaming extends to all levels of the organization. Senior management receives regular reports on monitoring outcomes, interventions, and policy effectiveness, fostering a

culture of accountability. Staff understand the importance of their role in safeguarding players and are encouraged to contribute ideas for improving processes and systems.

This culture ensures that responsible gaming is not treated as a compliance requirement alone but as a central element of the company's values and operational philosophy.

10.6 Integration with Business Strategy

Monitoring and continuous improvement are integrated into Elfy Interactive B.V.'s broader business strategy. By prioritizing player protection, the company maintains long-term sustainability, strengthens trust with customers, and ensures compliance with regulatory expectations. Responsible gaming is therefore both an ethical responsibility and a strategic asset, supporting the company's reputation and competitive position in the global market.

11: Policy Review, Governance, and Accountability

11.1 Governance Structure

Elfy Interactive B.V. has established a governance framework to ensure that responsible gaming is effectively implemented and maintained across all operations. The Board of Directors, senior management, and the Compliance Officer are collectively responsible for overseeing the company's adherence to responsible gaming standards.

Decision-making regarding responsible gaming policies, interventions, and player protections is structured to ensure accountability at every level. Key roles and responsibilities are clearly defined, and all staff are aware of their obligations under the policy.

11.2 Compliance Oversight

The Compliance Officer is responsible for monitoring adherence to the Responsible Gaming Policy, ensuring compliance with the Curaçao Gaming Control Board regulations, and reporting to senior management. This role includes overseeing player protection measures, reviewing incidents involving at-risk or underage players, and ensuring that all interventions are appropriate and documented.

Regular audits are conducted to evaluate the effectiveness of controls and to verify that staff actions align with policy requirements. Findings are reported to the Board to facilitate timely decisions and corrective actions where necessary.

11.3 Policy Review and Updates

The Responsible Gaming Policy is a living document, subject to regular review and updating to remain aligned with evolving regulations, industry best practices, and technological advancements. Policy reviews occur at least annually, with additional updates implemented as needed in response to regulatory changes, internal audit findings, or emerging risks.

All revisions are communicated to staff and incorporated into training programs to ensure consistent understanding and application throughout the organization.

11.4 Accountability and Reporting

Accountability is embedded at every level of Elfy Interactive B.V. Staff are encouraged to raise concerns, report incidents, and suggest improvements without fear of reprisal. All actions taken under the Responsible Gaming Policy are documented, creating a clear audit trail for regulatory authorities and internal review.

Reports summarizing monitoring activities, interventions, and policy effectiveness are presented to senior management on a regular basis. This ensures transparency and allows management to make informed decisions regarding resource allocation, training needs, and strategic initiatives related to responsible gaming.

11.5 Integration into Corporate Culture

Responsible gaming is integral to the corporate culture of Elfy Interactive B.V., influencing business decisions, product development, and customer interactions. By embedding these principles into everyday operations, the company promotes a culture of ethical behavior, transparency, and player protection.

Staff are regularly reminded that their actions contribute directly to player safety and the company's reputation. Governance structures and accountability mechanisms reinforce that responsible gaming is not optional but central to the organization's mission.

11.6 Commitment to Stakeholders

Through this governance and review framework, Elfy Interactive B.V. demonstrates its commitment to players, regulators, and the wider public. The company is dedicated to continuous improvement, proactive oversight, and transparent reporting, ensuring that responsible gaming remains a key priority at every level of operation.