

Responsible Gaming Policy

Daintree Interactive B.V. (hereinafter “Company”) Responsible Gaming Policy

1. Introduction

Daintree Interactive B.V., a business-to-business (B2B) provider of gambling-related services and goods, registered and operating in Curaçao under a license from the Curaçao Gaming Authority (CGA), is committed to promoting responsible gaming practices and preventing gambling-related harm. As a B2B provider, the Company supplies critical services or goods to B2C gaming operators. This standalone Responsible Gaming Policy outlines our procedures to ensure that our clients (B2C operators) implement effective player protection measures, in compliance with the National Ordinance on Games of Chance (LOK) and CGA guidelines. This Policy fosters a safe, transparent, and responsible gambling ecosystem by integrating responsible gaming principles into the Company’s operations and supporting client adherence to regulatory standards.

2. Objectives

The objectives of this Responsible Gaming Policy are to:

- Support B2C operator clients in preventing harm to vulnerable persons, including minors, problem gamblers, and those at risk of financial or emotional distress.
- Ensure compliance with CGA requirements under LOK for B2B providers, including verification of client responsible gaming practices and provision of enabling tools.
- Promote ethical practices in the gambling industry through technical support, advisory services, and ongoing monitoring.
- Identify and mitigate risks associated with problem gambling within our supply chain.
- Cultivate a culture of responsibility among the Company’s employees and clients through education and awareness.

3. Scope

This Policy applies to all business activities conducted by Daintree Interactive B.V., including:

- Provision of critical services or goods to B2C gaming operators.
- Onboarding, due diligence, and ongoing monitoring of B2C operator clients for responsible gaming compliance.
- Financial and operational transactions with clients that may impact player protection.

- Interactions with the CGA, Financial Intelligence Unit (FIU), and other regulatory bodies regarding responsible gaming oversight.

4. Regulatory Compliance

Daintree Interactive B.V. adheres to the LOK framework governing B2B gambling providers in Curaçao, including responsible gaming obligations. We maintain procedures to ensure compliance with:

- CGA mandates for B2B suppliers to support B2C operators in implementing age verification, self-exclusion, deposit limits, behaviour tracking, and other player protection measures.
- Requirements to verify that clients have robust responsible gaming policies, including dedicated RG sections on their platforms, self-assessment tools, and advertising controls.
- Obligations to report non-compliance or suspected harm to the CGA and cooperate in audits.
- Integration with international best practices, such as those from the European Gaming and Betting Association (EGBA) and FATF guidelines where responsible gaming intersects with AML/CTF.

Our compliance program aligns with CGA standards, emphasizing a risk-based approach to prevent underage gambling and protect vulnerable individuals.

5. Responsible Gaming Procedures for Clients

5.1 Onboarding B2C Clients

Before establishing a commercial relationship with any B2C operator client, Daintree Interactive B.V. conducts thorough due diligence to verify their responsible gaming framework.

5.1.1 Verification of Client Policies

We require documented evidence of the client's responsible gaming policy, including:

- Age verification processes.
- Self-exclusion and cooling-off.
- Deposit, loss, wager, and session time limits, with safeguards against rapid increases.
- Behaviour tracking systems to identify high-risk patterns.
- Advertising controls to avoid targeting vulnerable groups and include RG messages.

5.1.2 Risk Assessment

Each client is assigned a risk category (Low, Medium, High) based on:

- The client's compliance history with responsible gaming regulations.
- Geographical operations and exposure to high-risk jurisdictions for problem gambling.
- Nature of games or services offered.

Clients lacking adequate measures may be rejected or required to implement improvements as a condition of partnership.

5.2 Ongoing Monitoring

Daintree Interactive B.V. performs continuous monitoring of client relationships to ensure sustained responsible gaming compliance, including:

- Periodic reviews of client policies and practices, with frequencies based on risk level: Low (every 3 years), Medium (every 2 years), High (annually).
- Assessment of changes in client operations that could affect player protection (e.g., new game launches or platform updates).
- Requirement for clients to share incident reports involving vulnerable persons or RG breaches.
- Updates to our support services in response to trigger events, such as regulatory changes or CGA audits.

5.3 Enhanced Measures for High-Risk Clients

For high-risk clients, we apply enhanced measures, including:

- Senior management approval to establish or continue the relationship.
- Mandatory integration of advanced RG tools in supplied services.
- Increased reporting obligations on RG metrics, such as exclusion rates and intervention outcomes.
- Provision of customized advisory services to strengthen client policies.

6. Support for Responsible Gaming Implementation

6.1 Technical and Operational Support

Daintree Interactive B.V. provides tools and features to enable clients to meet RG obligations, including:

- Platform integrations for age verification, geofencing, and identity checks.
- Compatibility with self-exclusion registries.
- Analytics and monitoring tools to detect problem gambling indicators (e.g., unusual betting patterns, multiple accounts).

- Resources for player education, such as customizable RG banners, reality checks and helpline integrations.

6.2 Advisory Services

The Company offers guidance on best practices, including:

- Implementing default limits on deposits, wagers, and playtime.
- Promoting access to support organizations (e.g., Gamblers Anonymous, BeGambleAware, or local helplines).
- Training client staff on recognizing signs of distress and facilitating interventions.
- Ensuring no credit is offered for wagering and that advertisements include RG warnings.

6.3 Protection of Vulnerable Persons

Our support emphasizes protection for:

- **Minors:** Strict age verification to prevent access, with immediate refunds and account closures if detected.
- **Problem Gamblers:** Tools for self-assessments and exclusions (minimum 1 year, up to lifetime).
- **Other Vulnerable:** Monitoring for financial harm, with options for cooling-off periods (24 hours to 3 months) and operator-initiated exclusions.

7. Reporting and Incident Management

If the Company identifies non-compliance or risks to vulnerable persons in client operations:

- The Company will report the issue to the CGA and, if applicable, the FIU.
- Reports include details on the client, nature of the suspicion, and recommended actions.
- The Company refrains from tipping off clients in cases involving potential investigations.

Senior management oversees the reporting process to ensure timely and accurate submissions.

8. Record-Keeping

All responsible gaming-related records are retained for a minimum of five years, including:

- Client policy verifications and risk assessments.
- Monitoring reports, incident logs, and support provided.

- Correspondence with clients and regulatory authorities on RG matters.

Records are stored securely in compliance with data protection regulations and made available to the CGA upon request.

9. Risk Assessment and Mitigation

Daintree Interactive B.V. conducts regular risk assessments of responsible gaming vulnerabilities in our B2B operations, considering:

- **Client Risk:** Based on compliance history, ownership structure, and operational practices.
- **Product Risk:** Potential for supplied services to enable harm if not properly configured.
- **Geographical Risk:** Exposure to jurisdictions with inadequate player protections.
- **Technological Risk:** Vulnerabilities in RG tools or integrations.

Mitigation measures include structured due diligence, enhanced technical support for high-risk clients, annual risk reviews, and employee training on RG risks.

10. Training and Awareness

All employees and relevant contractors receive comprehensive training on responsible gaming, covering:

- LOK and CGA obligations for B2B providers.
- Identifying risks in client operations and supporting player protection.
- Best practices for advising clients on RG implementation.

Training is conducted annually, upon onboarding, and as needed for regulatory updates, with additional sessions for client-facing roles.

Training records are maintained and available for CGA inspections.

11. Internal Controls and Audits

Daintree Interactive B.V. maintains robust internal controls to ensure responsible gaming compliance, including:

- Regular audits of client monitoring and support processes, overseen by senior management.
- Independent external audits if required by the CGA.
- Documentation of all RG activities, including risk assessments and incident reports.

12. Cooperation with Authorities

Daintree Interactive B.V. cooperates fully with the CGA, FIU, and other authorities by:

- Providing timely information and records upon request.
- Submitting required reports, such as annual compliance statements.
- Participating in audits, inspections, or investigations to verify adherence.

13. Policy Review and Updates

This Responsible Gaming Policy is reviewed annually or upon significant regulatory changes. Updates are approved by senior management and communicated to all employees and relevant clients.

Contact Information

For inquiries related to this Responsible Gaming Policy, please contact: accounts@daintreegaming.com

Approval

This Responsible Gaming Policy was approved by:

Date: