

Responsible Gambling Policy

Novi B.V.

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1. Introduction

This Responsible Gambling Policy (“the Policy”) is adopted by Novi B.V. (“the Operator”) in accordance with the requirements of the **Curaçao Gaming Authority (CGA)**.

The purpose of this Policy is to ensure that gambling offered under our license is conducted responsibly, safely, and transparently. This Policy sets out the mandatory measures that the operator will implement to comply with the applicable laws and regulations, in particular the **National Ordinance on Games of Chance (LOK)** and the CGA Responsible Gambling standards.

2. Scope and Objectives

This Policy establishes the mandatory procedures and safeguards that apply to all gambling activities operated under our license.

The objectives of the Policy are to:

- 2.1 Prevent participation by persons under the age of 18.
- 2.2 Provide players with clear and accessible information about responsible gambling.
- 2.3 Make available tools that allow players to assess and manage their gambling activity.
- 2.4 Monitor player behavior and intervene when indicators of gambling-related harm are identified.
- 2.5 Provide mechanisms for players to suspend or exclude themselves from gambling.
- 2.6 Allow players to set financial limits on deposits.
- 2.7 Ensure that staff are trained to recognize and address responsible gambling concerns.
- 2.8 Conduct all advertising and marketing in a responsible and compliant manner.
- 2.9 Maintain internal oversight of responsible gambling measures and provide reports to management and the CGA.

3. Prevention of Underage Gambling

- 3.1 Gambling services are strictly limited to persons aged 18 years and older.
- 3.2 During registration, players must provide their date of birth and confirm they are of legal age.
- 3.3 Prior to first withdrawal and upon reaching regulatory thresholds, government-issued identification (passport, national ID, or driver’s license) must be verified.
- 3.4 If it is discovered that a minor has registered an account:
 - The account will be closed immediately.
 - Deposits will be refunded.
 - Winnings will be forfeited.
 - A clear explanation will be provided to the individual.
- 3.5 Records of age verification processes are retained and made available to the CGA upon request.

4. Player Information and Accessibility

- 4.1 A dedicated **Responsible Gambling Section** is available on the operator’s website. The section:
 - Provides clear information on responsible gambling.
 - Offers direct access to tools including deposit limits, cooling-off, and self-exclusion.

- Contains contact information for responsible gambling support.
- Includes links to local and international problem gambling support services.
- Is available in English and the target market language, while, at all times, the English version takes precedence in case of discrepancies.

4.2 The RG Section is linked from the homepage, Terms & Conditions, and site footer.

4.3 The footer of the website and applications includes:

- A prohibition statement against underage gambling.
- The operator's registered details and license number.
- The CGA's digital seal and regulatory statement.
- A link to the RG Section.
- Links to recognized gambling support organizations, as well as information on how the player can contact the operator for any Responsible Gambling concerns.

4.4 Terms & Conditions explicitly reference the RG Policy and are always accessible within one click from the homepage.

5. Self-Assessment

5.1 Players can access at least six months of wagering and transaction history directly from their accounts.

5.2 Extended records are available upon request within ten working days.

5.3 Self-assessment questionnaires are provided to help players evaluate their gambling habits.

5.4 Players are encouraged to use the results to decide whether to implement available responsible gambling measures.

6. Behaviour Monitoring and Intervention

6.1 The operator actively monitors player behavior to identify indicators of problematic gambling, including but not limited to:

- Sudden increases in deposits or wagering.
- Frequent failed transactions.
- Cancelled withdrawals.
- Extended gambling sessions.
- Frequent Responsible Gambling Tools usage
- Agitated or frequent communications with customer support.

6.2 Intervention procedures include:

- Providing information about responsible gambling tools.
- Applying mandatory limits or restrictions.

- Temporarily suspending accounts where necessary.
- Permanently excluding players in cases of severe or persistent risk.

6.3 All interventions are recorded in the Player Account Management (PAM) system.

6.4 Responsible gambling measures will never be used to delay or prevent legitimate withdrawals.

7. Cooling-Off and Self-Exclusion

7.1 Cooling-Off Periods:

- Players may suspend gambling for 24 hours, 7 days, 1 month, or 3 months.
- Accounts remain open for withdrawals, but gambling functions are disabled.
- Marketing communications are stopped if the player opts out.
- Accounts are automatically reactivated once the selected period expires.

7.2 Self-Exclusion:

- Players may exclude themselves for 1 year, 3 years, 5 years, 10 years, or lifetime via the easily accessible account settings or by contacting the operator with their request.
- Accounts are closed and log-in access is disabled.
- All marketing communications are stopped.
- The self-exclusion process can be completed entirely online by the player.
- Reactivation after the exclusion period requires a written request from the player.

7.3 Operator-Initiated Exclusion:

- The operator may impose an exclusion where there are clear signs of gambling-related harm or other risks.
- Such measures are documented and retained in line with regulatory requirements.

8. Deposit Limits

8.1 Players may set daily, weekly, or monthly deposit limits.

8.2 Once a limit is reached, no further deposits are allowed until the period resets.

8.3 Requests to reduce deposit limits are applied immediately.

8.4 Requests to increase deposit limits are subject to a 24-hour cooling-off period.

8.5 Deposit limits apply across all brands and domains operated under the license.

9. Staff Training and Readiness

9.1 All customer-facing staff receive mandatory training on responsible gambling, covering, but not limited to:

- Identification of problem gambling indicators.

- Procedures for interacting with at-risk players.
- Guidance on directing players to responsible gambling tools and external support.

9.3 Training is reviewed periodically to ensure effectiveness and compliance.

10. Advertising and Marketing

10.1 All marketing and promotional activity must comply with CGA requirements.

10.2 Marketing must not:

- Target minors or vulnerable persons.
- Present gambling as a financial solution or investment.
- Misrepresent games of chance as games of skill.
- Contain sexual, violent, or otherwise inappropriate content.
- Associate gambling with harmful behaviors such as alcohol or drug use.

10.3 All promotions must clearly state bonus terms and conditions and must not encourage excessive gambling.

10.4 All marketing must display a responsible gambling message.

10.5 The operator is responsible for ensuring that affiliates, partners, and third-party marketers comply with these standards.

11. Oversight and Reporting

11.1 A **Responsible Gambling Officer** (or Compliance Officer) will be appointed to oversee this Policy.

11.2 The Responsible Gambling Officer ensures that:

- The Policy is implemented and maintained.
- An **annual effectiveness report** is prepared for senior management, including recommendations for improvements.
- Any material changes to this Policy are reported to the CGA.

11.3 Records of responsible gambling measures, player interventions, exclusions, and staff training are maintained in accordance with regulatory requirements.

12. Review and Approval

This Policy is reviewed on an annual basis or as required by regulatory changes. Updates are approved by senior management and reported to the CGA.

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