

RESPONSIBLE GAMING POLICY
AGENICS N.V.

Last update: 05.30.2025

Signed and approved by:

The image shows a handwritten signature in black ink over a circular corporate seal. The seal features the company name 'MORGANITE' and 'CORPORATE SERVICES B.V.' around a central logo.

Morganite Corporate Services B.V.
Managing Director

1. Introduction

This policy aligns with the requirements of the National Ordinance on Games of Chance (LOK) and the CGA's Responsible Gaming framework.

Agenics N.V., is a company incorporated in Curaçao and registered with Curaçao Chamber of Commerce under number 149347 and is located at Abraham de Veerstraat 1, Curaçao (hereinafter – “we” or “Company”). We are committed to provide you (“you” means you as a player of our Domain(s)) with a safe, fair, and responsible gaming environment on all our domains, namely voltacasino.com and vostokcasino.com (hereinafter – “Domains”).

Agenics N.V. is licensed by the Curaçao Gaming Authority under license number (OGL/2024/1309/0602). We acknowledge our responsibility to encourage responsible gaming and protect our customers from the potential risks linked to gambling.

1.1. Commitment to Responsible Gaming

We acknowledge that gambling should be an enjoyable and controlled activity. Our responsible gaming framework is designed to help prevent problem gambling and empower players with the tools they need to make informed decisions about their gaming behavior.

1.2. Age Verification and Underage Gambling Prevention

We strictly prohibit underage gambling. Our platform employs robust age verification measures to ensure that only individuals over the legal gambling age (18+) can access our services. Any accounts found to belong to minors will be immediately suspended.

1.3. Self-Exclusion and Account Limits

To support responsible gaming, we provide players with the option to set deposit limits. Additionally, players who feel they need a break from gambling can opt for temporary or permanent self-exclusion or cooling off period. These measures help ensure that gaming remains a recreational activity and not a compulsive behavior.

1.4. Identifying and Assisting Problem Gamblers

We are committed to identifying signs of problem gambling through customer behavior monitoring and analytics. Our support team is trained to assist players exhibiting signs of gambling addiction and can provide guidance on seeking professional help from organizations specializing in gambling addiction treatment.

1.5. Fair and Transparent Gaming

We ensure that all our gaming products operate fairly and transparently by utilizing certified Random Number Generators (RNGs) and regularly audited gaming software. Our terms and conditions are clearly stated to provide full transparency regarding our operations.

1.6. Data Protection and Privacy

Protecting customer data is a top priority. We comply with all applicable data protection laws and implement secure measures to safeguard personal and financial information.

1.7. Encouraging Responsible Play

Our customer support team is available 24/7 to assist with any responsible gaming concerns.

1.8. Legal and Regulatory Compliance

As an operator licensed in Curaçao, we adhere to all regulations set forth by the Curaçao Gaming Authority (CGA). We continuously monitor and update our policies, including responsible gaming policy, to ensure compliance with industry best practices.

2. Age Verification

To prevent underage gambling, we have strict age verification procedures:

- A player must be at least 18 years old to register or play. We verify that the player is not a minor through date of birth confirmation. For this purpose, we request the player to provide us with government-issued valid identification document such as a passport, national ID card, driver's license. We also reserve a right to request the player to provide us with other documents in order to verify his/her age, such as selfie, proof of address, and employ third-party database checks.
- If the verification process determines that a player is underage or if we have a reason to suspect that the player is underage, we have a right to close player's account. Any funds frozen in accordance with the AML policy and any funds deposited by a minor will be returned, and any winnings will be forfeited.
- For regulatory purposes we keep a record of all age verification attempts and their outcomes
- In order to further prevent underage gambling, we remind adults that you should take precautions when sharing devices with your minors - such as safeguarding usernames, passwords, and payment details.

Below you may consider links to third-party software that can help restrict access to gambling websites:

- a) Net Nanny – www.netnanny.com
- b) GamBlock – www.gamblock.com
- c) CyberSitter – www.cybersitter.com

3. Self-Assessment

You are encouraged to regularly assess your gaming habits to determine whether your gambling habits are within the healthy limits by providing self-assessment tools that allow you to answer a series of questions designed to help identify potential gambling behavior problems. These tools empower you to make informed decisions about your gambling activity.

One commonly used test is available from Gamblers Anonymous – this is a 20-question quiz that is published on their website. <https://gamblersanonymous.org/20-questions/>. Additionally, you can use the CAGE Questionnaire (Adapted for Gambling).

Players are encouraged to answer the following questions honestly:

- I. **C – Cut Down:** Have you ever felt you should cut down on your gambling?
- II. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
- III. **G – Guilty:** Have you ever felt guilty about your gambling?
- IV. **E – Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results:

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

If you recognize problematic gambling behavior through this self-assessment tools, you are encouraged to use responsible gaming tools (such as cooling period, self-exclusion etc).

4. Behavior Tracking

We continuously monitor your gaming activities through a combination of manual oversight and automated tracking systems to identify potential signs of problematic gambling. Our approach includes:

- Deposit and wagering patterns: Identifying sudden spikes in deposits or erratic betting behavior.
- Gaming session duration: Flagging prolonged, uninterrupted gaming sessions without breaks.
- Withdrawal reversals: Detecting repeated cancellations of withdrawal requests, which may indicate problematic gambling behavior.
- Use of multiple payment methods: Monitoring changes in payment sources, especially if used to bypass limits.
- Frequent changes to gaming limits: Observing players who continuously adjust deposit.
- Repeated use of responsible gaming tools: Tracking excessive use of cooling-off periods or self-exclusions.
- Player communication and support requests: Identifying players frequently contacting customer support with concerns related to financial issues, bonus requests, or gaming distress.
- Young players (18-25) with high spending: Applying additional scrutiny to younger players engaging in significant wagering activity.

The list above is not exhaustive. We reserve a right to monitor other factors in your gaming behavior in order to comply with regulatory requirements.

When signs of problematic gambling are detected based on assessed player profile, our support team will take measures, including:

- Sending responsible gaming messages, recommendations, responsible gaming tools, including deposit limits, time-outs, and self-exclusion.
- Encouraging the use of deposit and session limits.

- Restricting account activity, applying deposit limits, if necessary.
- Referring players to external gambling support organizations.

5. Training

To maintain high responsible gaming standards, we provide comprehensive training to all individuals associated with our platform:

Employee Training:

- All customer-facing employees, including customer support, VIP managers, and responsible gaming officers, must complete responsible gaming training.
- Training includes recognizing gambling addiction signs, handling self-exclusion requests, and interacting sensitively with at-risk players.
- Employees undergo refreshment courses annually to stay updated on new policies and best practices.

Affiliate & Marketing Partner Training:

- All affiliates must complete responsible gaming training before promoting our platform.
- Affiliates are required to follow strict guidelines regarding responsible gaming messaging, avoiding misleading claims, and ensuring that content does not target minors or vulnerable players.
- Regular compliance audits are conducted, and violations result in contract termination.

Social Media Influencer Training:

- Influencers must be educated on responsible gaming principles and must not promote gambling to minors or vulnerable individuals.
- All influencer content must include responsible gaming disclaimers and avoid portraying gambling as a financial solution or an emotional escape.
- The operator reserves the right to terminate partnerships with influencers who violate responsible gaming standards.

6. Cooling Off and Self Exclusion

Operator implements and maintain effective processes and tools that empower the player to manage their own gambling behaviour.

Two key mechanisms are available to players at all times via the RG Section of the website:

- **Cooling Off:** A short-term, temporary restriction from gambling activities, which the player can customize.
- **Self-Exclusion:** A long-term, irrevocable exclusion from all gambling activities under the operator's licence.

Self-exclusion is recognized by the gambling industry as a way for customers to control their gambling. The Company has implemented a self-exclusion facility to help customers who report or demonstrate that their gambling is out of control and want assistance to help them stop gambling.

Players shall be clearly informed of the differences between the two options. They shall be offered the option to proceed directly to self-exclusion if they self-identify as vulnerable.

	Cooling Off	Self-Exclusion
Wagering Prohibited	Player selection – all or by	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or All operator brands – as selected	All brands/domains under the operator’s license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None
Antepost bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing messages	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. Operator should have a plan to fully automate this process in short term.
Reactivation	Automatic	Player initiated

6.1 Cooling Off

6.1.1 Overview

The operator offering players the option to activate a cooling-off period, during which they are temporarily restricted from gambling activity. The options relate to:

1. Duration
2. Brand: (includes both the primary and any mirror domains of that brand)
3. Vertical
4. Marketing Opt-Out

The Duration and Marketing Opt-Out categories are mandatory. Inclusion of the Brand and Vertical categories are at the discretion of the operator.

Duration Only: Restriction on all wagering activity for the period selected on the brand where the restriction was initiated.

Duration, Vertical and Brand: Restrictions as selected, on brands selected, on verticals selected.

The player must select (by tick-box) their preference in each of these categories.

6.1.2 Duration Options

- 24 hours
- 7 days
- 1 month
- 3 months

6.1.3 Vertical Options

- ALL gambling activity
- Restriction on individual product verticals offered by the operator (for example Casino, Fixed Odds Betting, Poker and other P2P games). Casino may be sub-categorised as All Games or Slots Only.

6.1.4 Brand Options

- The current brand (website and/or app)
- All of the operator's brand

6.1.5 Marketing

- Opt-out.

6.1.6 Timing

The restrictions take effect immediately and shall be enforced according to the player's selections.

The operator does not propose:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The operator may incorporate a verification check for the elected periods of 1 or 3 months for the player to confirm the decision to take a break from gambling during the selected cool-off period, but such checks will be online only and neutrally expressed e.g. "You wish to cool off for one month. Please confirm".

6.1.7 Player Account

- Player funds remain accessible for withdrawal.
- Account remains active but with gambling features disabled.

6.1.8 Marketing and Communications

- Marketing materials will not be sent to players during their Cooling Off period if they have opted out.

- No bonuses, free play, or incentives will be offered during the cooling-off period.

6.1.9 Reactivation and Post-Cooling Off Protocol

- Accounts will be automatically reactivated after the selected Cooling Off period expires.
- No further action is required by the player.

6.2 Self-Exclusion

6.2.1 Overview

The operator offers players the option to self-exclude from all gambling activity.

1. Duration: In accordance with LOK clause 5.4(2) operators offers a long-term self-exclusion periods of at least 1 year.
2. Brand: All brands/domains operated under the operator's license.
3. Vertical: All gambling activity
4. Marketing: Automatic opt-out

The player must select (by tick-box) their preference as to the duration of the self-exclusion period, all the other elements are automatic.

Regarding the self-exclusion process(es), the player has the option to initiate and complete the self-exclusion process entirely online, without the need for email communication or operator approval.

6.2.2 Duration Options

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime

6.2.3 Timing

The restrictions take effect immediately and shall be enforced according to the player's selections. The civil law implications considered and may entail that any wagering that takes place following the self-exclusion request and prior to it being in effect must be voided and funds must be returned to the player.

The operator will not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The operator may implement one simple verification check to ensure that the player is aware they have chosen to self-exclude and understands the consequences of this decision. The verification will be conducted online and be brief and straightforward. The wording shall neutral, for example:

“You have chosen to self-exclude for 5 years. Please confirm”.

Player Account

- Account is closed. Player can no longer log-in.
- The operator has robust measures in place to identify where reasonably possible duplicate accounts exist and prevent self-excluded individuals from creating new accounts under different credentials.
- The civil law implications considered. These may include that any ante-post bets must be voided and refunded, subject to AML/CFT regulations.
- The player must complete any tournaments (for example poker tournament) that is in-running at the time of the self-exclusion.
- Contributions to progressive jackpots that were made by the player through gameplay prior to the self-exclusion request remain in-situ, but the player is no longer entitled to participate with the jackpot after the self-exclusion is in effect.

6.2.5 Reactivation and Post-Cooling Off Protocol

- After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account. The written request can be prompted at the point of the player attempting to log in after the exclusion period has ended or by unprompted written communication by the player via the official customer support channels. Reactivation cannot be instigated by the operator re-commencing communications with the player. Activation of a self-exclusion by a player is irreversible and irrevocable for the duration of the exclusion period selected.
- The operator retains records of self-excluded in accordance with the applicable retention periods in compliance with data protection requirements under Article 5.9 of the LOK and applicable Curaçao data protection laws. Additionally, where possible, and in line with surrounding regulations, any payment method known directly by the operator used by a self-excluded player will be blocked for future use during any exclusion period to prevent circumvention of restrictions.

6.3 Operator-Initiated Exclusion

The operator may exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour.
- The player attempts or engages in criminal activities through the operator’s platform.
- Operator may not exclude players solely on the basis of the amount of their winnings. Operator-initiated exclusions will be formally documented, and records will be kept for at least five years.

7. Limits

You can set a limit on the total amount you deposit over a defined period (weekly, or monthly). Once a deposit limit is reached, you are not able to deposit additional funds until the specified period resets

Any request to lower limit takes immediate effect, while increases require a seven-day waiting period.

In order to set a deposit limit or request to lower limit, please feel free to write us an email to consult@voltasupport.info from the email that you indicated during account registration.

8. General responsible gaming principles regarding marketing and advertising

To ensure responsible gaming practices, our marketing and advertising materials adhere the following principles:

1. Truthfulness & Transparency:
 - a. Marketing materials will not mislead players about the nature of gambling or the likelihood of winning.
 - b. All promotions, bonuses, and wagering requirements will be clearly stated with full terms and conditions.
2. Avoiding High-Risk Audiences:
 - a. Advertisements will not target self-excluded players, player that took cooling-off period, individuals with known gambling issues, or minors.
3. Promoting Responsible Play:
 - a. All advertisements will include responsible gaming messages and links to support organizations.
 - b. Ad materials will not suggest gambling as a means of financial security or a solution to personal problems.
4. Restrictions on Incentives & Bonuses:
 - a. Bonuses will not encourage excessive or impulsive gambling.
 - b. We will not offer bonuses specifically targeted at players exhibiting risky gambling behavior.
5. Affiliate & Influencer Compliance:
 - a. Affiliates and social media influencers promoting our platform will comply with responsible gaming guidelines.
 - b. Any non-compliance by affiliates or influencers will result in termination of agreements.