

POLICY
On Responsible Gaming

NEXUS INTERNATIONAL ENTERTAINMENT N.V.

Approved by the Board of Directors

March 2025

Confidential

Contents

1. Policy Introduction.....	5
2. Information.....	5
3. Player Self-Evaluation Tools	6
4. Player Activity Monitoring & Support	6
5. Verification of Players Age.....	6
6. Escalation Process.....	8
7. Cooling-Off Period Policy	8
8. Self-Exclusion	10
9. Account Supervision	11
10. Marketing and Contact Restrictions	12
11. Marketing campaigns	13
12. Session Monitoring Alerts.....	14
13. Limits	14
14. Employees Training	15

Glossary of Responsible Gaming Terms

Games of Chance

This term refers to activities where players stake real money or its equivalent with the intention of winning a reward of financial value. These games rely either entirely on randomness or on a blend of chance and minimal player input, without allowing players to meaningfully affect the result. Typical examples include poker and sports wagering.

LOK (National Ordinance on Games of Chance)

The principal piece of legislation governing the gambling sector in Curaçao. It sets out the legal standards and obligations for operators offering games of chance within the jurisdiction.

Marketing, Advertising & Promotional Activities

All forms of communication aimed at publicizing an operator's brand, products, or services. This includes—but is not limited to—digital marketing efforts, printed advertisements, social media promotions, and various other media formats designed to attract or retain players.

Mandatory Elements

These are essential features that must be incorporated into a Responsible Gaming program. They are designed to align with the operator's business model and target demographics to ensure compliance with regulatory expectations and the promotion of safe gambling behaviors.

Licensed Operator

An organization that holds a direct B2C gaming license issued by the Curaçao Gaming Control Board (GCB), or one that has been officially recognized with an Orange Digital Seal "Certificate of Operations," granting authorization to offer gambling services.

Self-Exclusion

A voluntary safeguard allowing individuals to opt out of gambling services—either partially or entirely—across all brands, websites, and platforms managed by the same licensed entity. This measure helps players limit their gambling activities when needed.

Vulnerable Individuals

As outlined in Article 1.1(h) of the LOK, this classification applies to any person who:

- Is under 18 years of age;
- Shows an inability to regulate their gambling behavior, with a potential or existing risk of addiction and harm to themselves or others;
- Has been legally or voluntarily barred from gambling;
- Has been declared insolvent or bankrupt.

1. Policy Introduction

Nexus International Entertainment N.V (hereafter referred to as "Nexus", "Company", "we", or "our"), registration No. 162180 with registered address at Abraham de Veerstraat 1, Curacao, is under an application, OGL/2024/1324/0750, for a gaming license in progress with the Curaçao Gaming Control Board. Until that process is concluded, based on a transitional arrangement, the Company is permitted to continue its operations under temporary Certificate of Operation issued by the GCB to continue operations. Certificate of Operation is subject to the National Ordinance on Offshore Games of Hazard (Landsverordening buitengaats hazardspelen, P.B. 1993, no. 63) (NOOGH).

In line with the Curaçao Gaming Control Board's (GCB) regulatory framework, the company has developed a comprehensive Responsible Gaming Policy that reflects industry best practices and addresses the unique needs of its audience. This policy is built to prevent problem gambling, protect vulnerable individuals, and encourage safe, responsible play across all platforms.

Responsible Gaming is embedded into the company's day-to-day operations, with initiatives focused on:

- Encouraging positive and responsible gaming experiences for every player
- Strictly preventing underage gambling and enforcing age verification protocols
- Offering tools and resources to help players stay in control of their gaming habits
- Supporting efforts to combat problem gambling and prioritize player well-being

As a licensed and accountable operator, the company is dedicated to keeping gambling a fun and recreational activity. A variety of tools and safeguards are in place to prevent compulsive behavior and block access to minors.

Above all, the company's mission is to deliver a secure, supportive, and enjoyable gaming environment—where players can engage responsibly and with confidence, in full compliance with regulatory and ethical standards.

2. Information

The company is committed to empowering players with clear, accessible, and transparent information so they can make informed choices about their gaming activities. In full compliance with the Curaçao Gaming Control Board (GCB) regulations, Responsible Gaming features are seamlessly integrated across both the website and app interface.

Our Responsible Gaming Policy is prominently displayed on the homepage and accessible from all major sections of the platform. To ensure inclusivity and understanding, the policy is offered in English and other key languages relevant to our global user base—helping players understand their rights and the tools available to support safe gaming.

To promote healthy play, players are given direct access to a range of protective tools designed to help manage gaming habits effectively.

3. Player Self-Evaluation Tools

Players can access their betting history and transaction records to assess their gambling behavior, allowing them to track their spending habits, monitor frequency, and identify any emerging patterns that may indicate problematic gambling. This transparency empowers users to make informed decisions about their gaming activity.

The Company encourages all users to seek further support if needed.

4. Player Activity Monitoring & Support

Frontline teams—including customer support representatives and VIP managers—play a key role in monitoring player behavior. By observing patterns and engaging directly with players, they help identify early signs of potential gambling-related issues. When at-risk behavior is detected, trained Responsible Gaming specialists intervene with tailored support, offering tools such as deposit limits, cooling-off periods, or self-exclusion options.

In more serious cases, mandatory restrictions or enforced self-exclusion may be applied.

5. Verification of Players Age

Preventing underage gambling is a top priority. That's why we've implemented a robust age verification process to ensure only individuals aged 18 and above can access our platform.

Our age verification process includes:

- Mandatory confirmation that users are 18 or older before making deposits or starting gameplay
- Confirmation of date of birth and acceptance via an "I am over 18" checkbox
- Verification of payment method ownership (e.g., matching credit card details), when necessary
- Submission of government-issued ID (passport, national ID, or driver's license) as part of the Know Your Customer (KYC) process (however, if we have any doubt of a player's age before the mentioned milestones are reached, ID Verification is to be requested earlier).

If it's determined that a player is underage:

- The account will be permanently closed
- Deposits will be refunded (except in cases involving anti-money laundering investigations)
- Any winnings will be forfeited
- All verification attempts will be documented for regulatory compliance

To further prevent unauthorized access, we encourage responsible adults to keep usernames, passwords, and payment details secure. We also recommend the use of trusted parental control software, such as:

- [Net Nanny](#)
- [GamBlock](#)

- [CyberSitter](#)

a) Important Signs We Monitor

Use of Multiple Payment Methods: Noting the utilization of various payment options, particularly when it appears intended to bypass deposit limits.

Deposit and Wagering Activity: Identifying sudden spikes or irregular patterns in deposits, bets, or gaming activity.

Prolonged Gaming Sessions: Monitoring extended periods of play without breaks or pauses.

Increased Customer Support Interaction: Observing frequent contact with support, especially involving bonus inquiries or indications of frustration.

Frequent Adjustments to Responsible Gaming Tools: Tracking repeated changes to deposit or loss limits and regular use of cooling-off features.

Multiple Account Attempts: Detecting efforts to create additional accounts in order to evade existing limits.

Cancelled Withdrawals: Monitoring players who consistently reverse their withdrawal requests.

High Spending by Younger Players: Keeping an eye on players under 25 who spend significantly, particularly in casino or virtual games.

Incongruent Spending Behavior: Identifying spending patterns that don't match the player's age, income, or demographic profile.

Maxed-Out Credit Cards: Observing cases where players reach their credit limits and attempt to use additional cards.

b) How We Verify Player Identity

The Company follows a structured approach to identifying and addressing problem gambling behavior, ensuring a safe and responsible gaming environment.

Risk Assessment of Player Profiles

- Developing player profiles with relevant data to assess individual risk levels.
- Continuously monitoring behavioral risk factors with real-time alerts for any concerning activity.

Direct Player Interaction

- Engaging with players who exhibit signs of problem gambling through trained responsible gaming professionals.
- Documenting all interactions, risk indicators, and actions taken within the Player Account Management system for transparency and follow-up.

Responsible Gaming Interventions

- Informing at-risk players about responsible gambling tools such as deposit limits, cooling-off, and self-exclusion options.

- Adhering to clear escalation protocols, which may include applying deposit limits, temporarily restricting account access for further assessment, or permanently excluding players deemed at extreme risk.

6. Escalation Process

When signs of problematic gambling behavior are detected, the case is promptly escalated to the **Compliance Officer** or **Responsible Gaming Officer** for further evaluation. These officers conduct a thorough assessment to determine the most suitable intervention strategies, which may include:

- A. **Facilitating Self-Exclusion** – Assisting players who choose to voluntarily exclude themselves from gambling for a specified period, providing guidance and support to reinforce responsible gaming practices.
- B. **Imposing Additional Restrictions** – Introducing stricter deposit or wagering limits, adjusting session time constraints, or restricting access to specific gambling products to help individuals regain control over their gaming behavior.
- C. **Providing Support Resources** – Offering information on professional support services, including helplines, counseling programs, and treatment options, to help individuals address gambling-related concerns.
- D. **Enforcing Mandatory Exclusion** – When voluntary measures prove insufficient, mandatory exclusion may be implemented to protect individuals from further harm by restricting access to gambling activities.
- E. **Ongoing Monitoring and Follow-Up** – Establishing continuous monitoring procedures to assess the effectiveness of interventions and ensuring that players receive additional support when necessary.

7. Cooling-Off Period Policy

As a responsible gaming operator, the Company are committed to ensuring that the cooling-off period is **easily accessible, immediately enforceable, and free from interference**. If technical adjustments are necessary to implement this feature, the Company will manually process requests until a fully integrated solution is available.

7.1 Accessibility and Reach

Players can initiate a **cooling-off period of 24 hours, 7 days, 1 month, or 3 months** across all product verticals on our platform. During this time, they will be temporarily restricted from engaging in any gambling activities.

- The cooling-off option is **clearly displayed on our website** and can be activated with a **single-click button**, eliminating the need for email requests or operator approval.

Immediate Activation and Restrictions

Once a player selects the cooling-off option, the following measures take effect instantly to promote responsible gaming:

- **Clear Information on Options** – Players receive guidance on the difference between a cooling-off period and self-exclusion, enabling them to choose the most suitable restriction.
- **Instant Enforcement** – The selected restriction is applied immediately, ensuring swift compliance with the player's decision.
- **Temporary Account Suspension** – The player's account is locked for the duration of the cooling-off period, preventing access to gambling activities.
- **Marketing Opt-Out** – Players have the option to opt out of marketing communications throughout their cooling-off period.

7.2 Ethical Standards: Commitment to Non-Interference

To uphold ethical standards, the Company strictly prohibits any actions that may discourage players from initiating a cooling-off period. This includes:

- **Respecting Player Decisions** – No questioning or attempts to dissuade the player from activating the cooling-off period.
- **No Delays or Reassurances** – Players will not be encouraged to reconsider or postpone their decision.
- **No Incentives to Continue Gambling** – Bonuses, promotions, or any incentives will not be offered to influence the player's choice.

7.3 Cooling-off Options

At the end of the cooling-off period, the following processes ensure a smooth transition:

- **Automatic Account Reactivation** – The player's account is reactivated without requiring further action.
- **Information About Additional Restriction Options** – Players are informed about further time-out options or self-exclusion programs should they require extended or permanent restrictions.

These measures reinforce our commitment to responsible gambling, ensuring that players remain in control of their gaming activities while having access to the necessary support.

8. Self-Exclusion

The Company have established a comprehensive and well-documented self-exclusion program designed to empower players to manage their gambling behaviour and mitigate potential harm.

Key components of this program include:

1. **Immediate Implementation:** Upon a player's request for self-exclusion, the restriction is enforced without delay, effectively preventing access to gambling activities.
2. **Self-Exclusion Register Maintenance:** the Company maintains a dedicated Self-Exclusion Register, recording details of self-excluded players. These records are retained for a minimum of seven years following the conclusion of the exclusion period, ensuring compliance with regulatory obligations and facilitating ongoing support.
3. **Payment Method Restrictions:** Any known payment methods associated with a self-excluded player are blocked during the exclusion period. This measure prevents the circumvention of self-exclusion restrictions and reinforces the effectiveness of the program.
4. **Comprehensive Support and Resources:** The Company provides self-excluded individuals with information about available support services, including counselling and support groups, to assist in managing their gambling behaviour.
5. **Regular Program Evaluation:** Our self-exclusion program undergoes regular assessments to ensure its effectiveness and alignment with evolving best practices in responsible gambling. Feedback from participants is utilized to enhance the program continually.

By implementing these measures, the company aims to create a safer gambling environment and support individuals in maintaining control over their gambling activities.

Sources

8.1 Self-Exclusion Process and Requirements

To ensure that self-exclusion is easily accessible and transparent, the Company provides the following:

Prominent Visibility: The self-exclusion option is clearly displayed across our website, ensuring easy access for all players.

Comprehensive Information: Players will receive clear guidance on:

The steps required to initiate and complete self-exclusion.

The range of available self-exclusion durations.

The benefits of self-exclusion as a responsible gaming tool to prevent problem gambling.

8.2 Immediate and Irreversible Action

Instant Activation: Players can self-exclude entirely online without requiring email confirmation, manual approval, or customer support intervention.

User-Friendly Process: The self-exclusion process is streamlined to be easy to understand and completed within 15 minutes.

Fraud Prevention Measures: Advanced verification tools are in place to detect duplicate accounts and prevent self-excluded players from registering new accounts using alternative credentials.

Comprehensive Blocking: A self-excluded player will also be restricted across all our domains and will be encouraged to self-exclude from other gambling operators via national self-exclusion schemes.

8.3 Self-Exclusion Periods

In full compliance with regulatory requirements, the Company provides a range of self-exclusion periods, ensuring players can make a firm and informed decision about their gambling activity.

- **Duration Options** – Players can choose from 1 year, 3 years, 5 years, 10 years, or lifetime self-exclusion, based on their needs.
- **Immediate Enforcement** – Self-exclusion requests are processed and applied instantly, without delays.
- **Strict Ethical Standards** – The Company upholds a responsible gaming approach by prohibiting any interference with a player's decision to self-exclude. This includes:
 - Respecting the player's choice without questioning it.
 - Refraining from offering incentives, bonuses, or promotions.
 - Avoiding reassurances or encouragement to reconsider.
 - Ensuring the process is not delayed or obstructed in any way.
- **Irreversible Commitment** – Once self-exclusion is activated, it cannot be reversed or shortened until the selected period expires.
- **Customizable Exclusion** – Players have the flexibility to self-exclude from specific product verticals (e.g., casino, sportsbook, poker) or apply restrictions across all gambling activities on our platform.

9. Account Supervision

Full Self-Exclusion Across All Gambling Verticals

When a player chooses full self-exclusion from all gambling products, the following actions are implemented immediately:

- **Transaction Blocking:** All gambling-related transactions are halted, preventing further deposits or bets.
- **Account Suspension:** The player's account is deactivated, restricting any access to gambling services.
- **Fund Reconciliation:** Any remaining withdrawable balance (excluding funds subject to Anti-Money Laundering (AML) reviews) will be returned to the original payment method within two business days.
- **Marketing Opt-Out:** The player is permanently removed from all promotional and marketing communications.

Self-Exclusion from Specific Gambling Verticals

For players opting to exclude themselves from certain gambling categories:

- **Targeted Restrictions:** Access is blocked only for the selected gambling products, while all other permitted activities remain available.

9.1 Account Reactivation

- **Formal Reactivation Request:** Players are required to submit a written request to initiate the reactivation of their account.
- **Responsible Gaming Guidance:** Prior to reactivation, players will receive information and support on responsible gambling, including reminders about available protective tools and resources.
- **Self-Assessment Questionnaire:** To promote informed and mindful decision-making, players must complete a gambling awareness questionnaire reflecting on their gaming behavior.
- **Reactivation with Original Account Details:** Accounts are reactivated only under the original registration credentials, ensuring gaming history is retained and previous exclusions cannot be bypassed.

These policies ensure that self-exclusion remains an effective tool for players seeking control over their gambling behaviour while promoting a safer and more responsible gaming environment.

10. Marketing and Contact Restrictions

During and after a self-exclusion period, the following restrictions will apply:

- **Limited Communication:** Players will not receive any contact from us unless it pertains to legal matters or essential non-promotional information.

- **No Marketing or Incentives:** Self-excluded players will not be sent promotional content, free play offers, bonuses, or any form of gambling-related incentives.
- **Reactivation Procedures:** While cooling-off periods conclude automatically, reactivating an account after self-exclusion requires explicit player action to resume gameplay.

10.1 Compliance and Regulatory Obligations

To ensure full compliance with responsible gaming regulations, all self-exclusion activities will be documented in real time. In the event that a self-excluded player or an underage individual gains access to gambling services beyond their exclusion settings:

- **Refund of Deposits:** Any deposited funds (excluding those restricted by Anti-Money Laundering (AML) policies) will be refunded within two business days.
- **Immediate Account Suspension:** The account will be blocked to prevent further access.
- **Regulatory Reporting:** A formal incident report will be submitted to the relevant regulatory authority within five working days.

10.2 Initiated Exclusion

In certain circumstances, the Company may proactively exclude a player as part of our high-risk intervention measures, particularly if:

- **Evidence of Problematic Gambling Behaviour:** The player exhibits signs of compulsive or high-risk gambling behaviour.
- **Involvement in Criminal Activities:** The player engages in fraudulent or unlawful activities on our platform.

All cases of initiated exclusion will be formally documented, with records retained for a minimum of five years to ensure regulatory compliance and responsible gaming enforcement.

11. Marketing campaigns

The Company adheres to responsible gaming principles in all marketing and advertising efforts. Direct marketing (emails, SMS, push notifications) is strictly prohibited during active cooling-off or self-exclusion periods.

Advertising and Marketing Restrictions:

- No aggressive, misleading, or irresponsible advertising.
- No targeting of vulnerable groups, minors, or problem gamblers.
- No portrayal of gambling as an investment or financial solution.

- No emotional manipulation or misleading representations of skill vs. chance.

Affiliate and Social Media Advertising

- All affiliates must comply with responsible gaming standards.
- Social media influencers must be of legal age, have appropriate audiences, and refrain from sexually provocative content.

Sponsorships must not target vulnerable individuals, minors, or youth-related events

12. Session Monitoring Alerts

To promote responsible gambling, we have introduced comprehensive reality check feature – Real-Time Session Timer s that enables players to monitor and manage their gaming activities effectively.

Real-Time Session Timer: A continuously displayed timer tracks the duration of each gaming session, allowing players to remain aware of the time spent on the platform.

By integrating these tools, the Company aims to foster safer gaming habits and empower players to maintain better control over their gambling behavior.

13. Limits

Company offers a suite of tools designed to help players manage their gambling activities responsibly. These tools include the ability to set deposit limits on a daily, weekly, or monthly basis. Players can decrease their limits at any time with immediate effect, while requests to increase limits are subject to a waiting period to ensure informed decision-making.

Deposit and Other Limits

- **Deposit Limits:** Players can set maximum deposit amounts for specified periods (daily, weekly, or monthly). Once a limit is reached, no additional deposits are permitted until the next period begins.
- **Modification of Limits:**
 - **Decreasing Limits:** Requests to lower deposit limits take effect immediately, allowing players to promptly reduce their spending.
 - **Increasing Limits:** Requests to raise deposit limits are subject to a mandatory seven-day waiting period, promoting thoughtful decision-making and preventing impulsive increases.

By providing these customizable tools, the Company aims to empower players to maintain control over their gambling activities and promote a safe and enjoyable gaming environment.

14. Employees Training

The company ensures that customer service and responsible gaming staff are trained to:

- **Recognize signs of gambling distress**, identify indicators such as agitation, aggression, financial desperation, preoccupation with gambling, and significant increases in gambling frequency or stakes
- **Conduct sensitive and structured conversations with at-risk players**. Engage with at-risk players empathetically, utilizing effective communication techniques to discuss their gambling behaviours and offer support.
- **Direct players to appropriate support resources and responsible gaming tools**. Inform players about available resources, including self-exclusion programs, deposit limits, cooling-off, and external support services like counselling and helplines.
- **Document all interactions for compliance and follow-up actions**. Maintain detailed records of all interactions with players concerning responsible gaming to ensure compliance with regulatory requirements and facilitate appropriate follow-up actions.

Training is conducted at least annually and more frequently if necessary. The training program is regularly updated to incorporate the latest best practices and feedback from internal and external stakeholders. Effectiveness is evaluated through formal mechanisms, such as pre- and post-training assessments, to ensure staff are well-prepared to support responsible gaming initiatives.

This policy reinforces our commitment to responsible gaming and ensures compliance with regulatory standards. This policy is subject to regular reviews and will be updated as necessary. All revisions are subject to approval by the Board of Directors.



Theoklis Andreou