

Continent Gaming N.V.

Responsible gambling policy

Internal version

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1. Introduction

- 1) Gambling may have benefits but also has well documented negative consequences. Internet gambling is no exception. It is clear that some who gamble online will develop problems and that these problems are serious. The most ethical and cost-effective response to gambling addiction issues is a comprehensive public health strategy that includes prevention, education, treatment, enforcement, responsible gambling, research and recovery services. Responsible gambling standards are an important aspect of this approach.
- 2) Problem gambling is a disorder characterized by preoccupation with wagering, chasing losses and losing control over the amount of time and money spent gambling.
- 3) Responsible gambling is policies and programs designed to prevent and reduce potential harms associated with gambling; they often incorporate a diverse range of initiatives designed to promote consumer protection, improve community and consumer awareness and education, and provide referrals to treatment and recovery resources.

2. Policy

- 1) Policy Commitment: Corporate policy makes a clear commitment to responsible gambling and identifies expectations for corporate leadership. The policy should seek to ensure that the prevention of gambling- related harm is included in all strategic decisions.
- 2) Strategy: The operator has a responsible gambling strategy with defined goals and a clear plan of action.
- 3) Evaluation and Reporting: The strategy should be evaluated annually for progress and a report made publicly available.

3. Definitions

- 1) **Games of Chance** means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker
- 2) **LOK** is the National Ordinance on Games of Chance law of Curacao.
- 3) **Marketing, promotion and advertising** refer to all resources, messages and media that promote the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns.

- 4) **Mandatory Requirements** are the basic elements of a Responsible Gaming policy that must be implemented by all operators. These elements must reflect the target markets and players of the operator.
- 5) **Operator** is a holder of a B2C license from the Curacao Gaming Authority (or holder of an Orange Digital Seal “Certificate of Operations”)
- 6) **Self-exclusion** is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator. That self-exclusion should apply across all domains and brands operated by the same operator.
- 7) **Vulnerable Person** is defined in the Clause 1.1 (h) of the LOK as
 - Under eighteen years of age.
 - Has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people.
 - Has been banned from playing any Game of Chance either by force or at his or her own request.
 - Has been declared bankrupt.

4. Regulations

- 1) National Ordinance on Games of Chance, December 24, 2024;
- 2) Responsible Gaming Policy for Licensed Operators, Version 1.0, 21st February 2025.

5. Mandatory Requirements

- 1) For operational compliance with the CGA gaming license the operator fulfills the following conditions:
 - Age verification;
 - Information accessibility;
 - Player self-assessments;
 - Behaviour tracking;
 - Player facilitated cooling-off periods and self-exclusion;
 - Deposit limits;
 - Training of employees, affiliates, marketing partners, social media influencers;
 - General responsible gaming principles regarding marketing and advertising.
- 2) The operator appointed the officer which fulfils the responsible gaming role in the organization. This officer is responsible for implementing and enforcing the Responsible Gaming policy and must provide a report to the operators Executive Management team no less frequently than once every twelve (12) months as to the effectiveness of the policy and related operational procedures and shall provide

recommendations to management as to proposed operational or policy enhancements. Any changes to policy must be reported to the CGA.

6. Age verification

- 1) The operator has developed and implemented a process for verifying the age of players.
 - When registering an account, the player must confirm that he/she is of legal age and the player must check the box "I am over 18 years old".
 - Age verification is subject to the CGA's Know Your Customer and AML policies and include a government-issued valid ID check (such as a passport, national ID, or driver's license).
 - If the operator had any doubt whatsoever of a player's age prior to KYC or AML milestones being reached, age verification undertakes at that point. The operator uses secondary verification methods, such as proof of address, selfie verification, or third-party database checks.
- 2) If the check reveals that the player is a minor, or the operator has reason to suspect that the player is a minor, access will be denied, and appropriate action will be taken. Except for funds frozen in accordance with the AML policy, any funds deposited by a minor will be returned and any winnings will be confiscated.
- 3) The operator must clearly communicate to the minor the reason for closing the account.
- 4) Operators must maintain records of all age verification attempts and their outcomes. These records must be made available for regulatory review.
- 5) To further prevent minors from gambling, the operator provides the following links to software that can help restrict access to gambling sites:

Net Nanny – www.netnanny.com

GamBlock – www.gamblock.com

CyberSitter – www.cybersitter.com

7. Availability of information for players

- 1) The operator provides all the necessary information on its website and in the application interface so that players can make informed choices and take immediate action when necessary.

Homepage requirements

- A clear and visible link to the Responsible Gaming Policy is provided on the homepage, which can be accessed from the relevant pages of the website or the app interface.
- The Responsible Gaming Policy is available in English.

- Players are provided with direct access to responsible gaming tools that allow them to manage their gaming behavior, self-exclusion, cooling-off period, setting limits.
- The operator's responsible gaming email is provided on the homepage.

Terms and Conditions requirements

- The responsible gaming policy is included in the website's Terms and Conditions.
- The terms and conditions must be accessible one click from the website's home page.
- Players must be informed about the available responsible gaming tools, their functionality and how to use them.

Footer Information Requirements

- 1) The footer of the gaming site contains the following important information:
 - A clear visual indication that minors are not allowed to participate in gambling.
 - The name and registered office of the license holder.
 - The official license number issued by the Curacao Gaming Authority.
 - A statement confirming the regulatory oversight of the Licensee by the Curacao Gaming Authority.
 - A link to the Responsible Gaming Policy Statement.
 - The operator's digital CGA seal.
 - A link to problem gambling support resources

8. Self-Assessment

- 1) The operator provides players with access to a detailed history of their bets and wagering, including timestamps of transactions from their gaming account since the date it was opened.
- 2) The operator encourages players on its website to regularly assess their gambling habits to determine whether their gambling is within reasonable limits and provides them with self-assessment tools that allow them to answer a series of questions designed to help identify potential problematic gambling behavior.
- 3) These tools allow players to make informed decisions about their gambling activity.
- 4) The operator recommends that any player who recognize problematic gambling behaviours through self-assessment should explore the available responsible gambling tools.

9. Behaviour Tracking

- 1) Active monitoring identifies signs of problem gambling. By analyzing deposit activity, betting patterns, session lengths and player interactions, the operator identifies individuals at risk and takes proactive measures to prevent gambling-related harm. This is also relevant in relation to Article 1.4(e) of the Casino Act (LOK), which prohibits

the operator from providing gambling opportunities to individuals who must reasonably be considered vulnerable.

- 2) Behavior monitoring is typically carried out by the person responsible for gambling within the organization.

Key monitoring factors

- Deposit and wagering frequency – sudden increases or erratic deposit, wagering or gaming session patterns.
- Use of multiple payment methods – particularly attempts to bypass limits.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- Extended play sessions – prolonged gaming without breaks.
- Increased communication with customer support – including requests for bonuses or signs of agitation.
- Frequent changes to responsible gaming tools – such as continuously increasing deposit or loss limits or repeatedly making use of cooling-off period.
- Players under 25 years old spending substantial amounts, particularly on casino or virtual games.
- Players maxing out a credit card and attempting to register additional cards.
- Unrealistic spending patterns that do not align with the player's demographic profile.
- Attempts to open multiple accounts to bypass deposit or loss limits.

Procedures for Player Identification and Intervention

- 1) Process for Player identification and intervention includes:

- Player Profiling and Risk Assessment
 - Operators must establish player profiles with relevant data points to assess individual risk levels.
 - Behavioural risk factors should be continuously monitored, with real-time alerts for concerning activity.
- Direct Player Interaction
 - When concerning behaviour is identified, the operator must initiate direct contact with the player via trained responsible gaming professionals.
 - This interaction should be documented within the operators Player Account Management system, including indicators of concern and actions taken.
- Responsible Gaming Interventions
 - Players exhibiting at-risk behaviour must be informed about responsible gaming tools, including deposit limits, time-outs, and self-exclusion.
 - Operators must have clear guidelines for escalating concerns, which involve:
 - Applying deposit limits to the player's account.
 - Temporarily suspending access pending further review.

- Excluding the player in cases of extreme risk.

Staff training

- 1) Corporate Policy: The implementation of the responsible gaming policy and procedures is the responsibility of a designated officer, whose details are posted on the website. All directors, managers and employees are regularly reminded of the organisation's responsible gaming policy, and general updates on industry best practice are published.
- 2) Training: All staff should be trained every year on responsible gambling, including but not limited to, definitions of key terms, myths and facts and where to get help, with content updated as necessary. Customer-facing staff should have enhanced annual training in player protection and responsible gambling interventions. These staff members are taught skills and procedures specific to their position to respond to situations where a player is in distress. Staff knowledge of responsible gambling should be tested as part of the training. Training should be developed or evaluated by an unaffiliated third party with experience in gambling addiction and responsible gambling.

Escalation

Any problematic behaviour identified must be escalated to the Compliance Officer or Responsible Gaming officer who must assess each case and determine whether further restrictions, exclusions, or responsible gaming interventions are necessary.

10. Cooling Off

- 1) The operator must ensure that the cooling-off period is easily accessible, performed immediately and without interference. The service can be provided online or via a help desk.

Availability and Accessibility

A player can activate a cooling-off period of 24 hours, 7 days, 1 month or 3 months on the operator's website, during which he is temporarily prohibited from playing. A player can choose a cooling-off period by selecting any combination of one, several or all product verticals offered by the operator.

Immediate Activation and Restrictions

- The player will be informed of the difference between a Cooling Off period and self-exclusion and will be given the option to proceed directly to self-exclusion if they so choose.
- The decision will be effective immediately.

- The player's account will be blocked for the duration of the period chosen by the player.
- The player must be given the opportunity to enhance their protection by opting out of the marketing database during the Cooling Off period.

Reactivation and Additional Time-Out Options

Once the cooling off period has expired, the player's account will be automatically reactivated, allowing them to continue playing without the need for any further action.

11. Self-Exclusion

- 1) The operator must implement a clearly defined and documented self-exclusion program that is easily accessible and ensures immediate action upon a player's request. This tool is designed to help individuals regain control over their gambling behaviour and prevent further harm.
- 2) The operator must retain records of self-excluded players in a dedicated Self-Exclusion Register for a minimum of seven years from the end of a player's exclusion period. Additionally, any known payment method used by a self-excluded player must be blocked for future use during any exclusion period to prevent circumvention of restrictions.

Self-Exclusion Process

- 1) Information about the self-exclusion option is posted on the operator's website.
- 2) The operator must have measures in place to identify duplicate accounts and prevent self-excluded individuals from creating new accounts under different credentials.
- 3) A player who self-excludes must also be excluded from all the operator's domains and the player should be encouraged to self-exclude from other gambling sites.

Self-Exclusion Periods and Restrictions

- 1) In accordance with clause 5.4(2) of the LOK, the operator offers a long-term self-exclusion of 1 year with further options of 3 years, 5 years, 10 years and lifetime exclusion.
- 2) Once a self-exclusion request is submitted, it is effective immediately.
- 3) Once a self-exclusion is confirmed, the player cannot revoke it until the end of the exclusion period.
- 4) A player may choose to self-exclude by selecting any combination of one, several or all product verticals offered by the operator.

Financial and Account Management

- 1) Upon activation of full self-exclusion of all verticals:
 - All gambling related transactions must be immediately blocked.
 - The player's account must be deactivated, preventing further gambling.
 - Except for funds frozen in accordance with the AML policy, any remaining funds in the player's account must be returned to the original payment method within two business days (as required by the AML policy).
 - The operator must permanently remove the player's details from all marketing and advertising lists.
- 2) After activation of self-exclusion of one or more (but not all) verticals.
 - The gameplay and betting must be completely restricted in accordance with the player's preferences.

Reactivation and Post-Exclusion Protocol

- 1) After the self-exclusion period ends, the operator must require the player to confirm in writing their request before unblocking the account. In addition, the operator must provide a message regarding responsible gaming, remind the player of the safeguards that are in place and encourage the player to complete gambling anonymous questionnaire. The player's gaming history must be preserved, and the account must be restored only under their original credentials.

Marketing and Contact Restrictions

- 1) During and after the self-exclusion period (for one or more or all verticals):
 - The operator must not contact the self-excluded player under during the period of exclusion, excepting any third party, legal or other non-marketing messaging required.
 - The operator must not send promotional materials or encourage the player to resume gambling by offering free play, bonuses, or any other incentives.
 - Cooling off periods end automatically, however after Self Exclusion the decision to resume play must be entirely initiated by the player.

Compliance and Regulatory Obligations

- 1) The operator must document all self-exclusion activities and actions in real time. The CGA may request these records at any time to ensure compliance.
- 2) If a self-excluded individual or minor is found to have accessed gambling beyond their self-exclusion choices, the operator must:

- Excepting any funds frozen in accordance with the AML policy refund all deposited amounts to the player within two business days.
- Immediately block the player's account to prevent further play.
- Submit a detailed report to the CGA within five working days, outlining how the issue occurred and what actions are being taken to prevent recurrence.

Operator-Initiated Exclusion

- 1) 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-initiated exclusions must be formally documented, and records must be kept for at least five years. The CGA may request these records at any time.

12. Limits

- 1) Players are provided with tools to control their gaming activity by setting deposit limits. Players can set these limits on a daily, weekly or monthly basis, allowing them to tailor the limits to their individual gaming habits.
- 2) Players can tighten their limits at any time, and such changes are effective immediately.
- 3) Any request to relax a limit is subject to a mandatory waiting period, ensuring that informed decisions are made.

Deposit Limits

- Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).
- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.
- Any request to reduce a deposit limit takes effect immediately, while requests to increase a limit are subject to a seven-day waiting period before implementation.

Exceptions to Limits and Exclusions

- 1) A limit or exclusion has the potential to affect active wagering – including, but not limited to:
 - A time limit set when a player is active in a poker tournament.
 - A limit or exclusion when a player has an unresolved ante-poste bet on a future event.
- 2) In these situations, the restrictions as outlined above must be honoured immediately except for the active gameplay or wager(s). Upon completion of the relevant tournaments, wagers or events the restrictions apply.

13. Reality Check

- 1) The operator provides the player with the following reality checks:
 - A real-time session timer that is displayed continuously while the player is logged in.
 - Player-triggered reality checks. Players may have the option to set up customized reality check alerts at specific intervals. When a reality check is triggered, the player must confirm that they have read the message before resuming play and is offered the option to end the session or continue playing.
- 2) Tailored reality checks pause play momentarily and require the player to confirm that they have read the message before resuming play. Tailored messages may include:
 - A clear indication of the length of play.
 - Display of the player's wins and losses during that period

14. Marketing and Advertising

- 1) The operator is responsible for ensuring that all marketing, promotional, and advertising activities adhere to responsible gaming principles. Direct marketing activities (including emails, messaging, bonuses or incentives) are prohibited during an active cooling off or self-exclusion period.
- 2) Advertising must not mislead, encourage excessive gambling, or target vulnerable individuals.
- 3) Additionally, the operator must ensure that all business partners, including affiliates, influencers (social media or otherwise), VIP representatives, and marketers, comply with the responsible gaming framework and applicable advertising regulations.

Advertising and Marketing Restrictions

- 1) Operators must not engage in misleading, excessive, or irresponsible advertising. The following restrictions apply to all forms of marketing and advertising:
 - No Aggressive or Misleading Tactics – Advertising must not be excessive, deceptive, or aggressive in nature.
 - No Targeting of Vulnerable Groups – Marketing and promotions must not target or appeal to self-excluded players, individuals with gambling problems, minors, or financially vulnerable people.
 - No Portrayal of Gambling as an Investment – Advertising must not promote gambling as a way to achieve financial success or solve financial difficulties.
 - No Misrepresentation of Skill vs. Chance – Marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
 - No Emotional Manipulation – Advertising must not portray gambling as a means of escaping stress, depression, loneliness, or other personal struggles.

- No Child-Friendly Content – Cartoons, animations, and visuals that appeal to children or minors must not be used.
- Operators must not use social media influencers, celebrities, or entertainers who appeal to minors in any marketing campaign.
- Marketing materials must not feature minors or depict them engaging with gambling content.
- No Sexual or Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
- No Association with Unrelated Harmful Behaviours – There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.
- Bonus Conditions:
 - Bonuses and promotions must be communicated transparently with clear terms and conditions.
 - Operators must not encourage excessive gambling through aggressive bonus promotions.

Responsible Gaming Commitments in Consumer Advertising

1. The operator will comply with the requirements for responsible gambling in consumer advertising.