

SUREWIN B.V.

Responsible Gaming Policy

Version 2

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Glossary and Regulatory References

<u>Term / Acronym</u>	<u>Definition</u>
AML	Anti-Money Laundering. Measures designed to prevent the use of gambling services for money laundering activities.
CGA	Curaçao Gaming Authority, the regulatory authority responsible for licensing and supervising gambling operators in Curaçao.
CGA Responsible Gaming Policy	The Responsible Gaming Policy issued by the Curaçao Gaming Authority outlining mandatory Responsible Gaming requirements for licensed operators.
DOB	Date of Birth used during registration and customer verification procedures.
KYC	Know Your Customer requirements used to verify customer identity and assess risk.
LOK	National Ordinance on Games of Chance (Landsverordening op de Kansspelen), Curaçao's gambling legislation governing licensed operators.
Responsible Gaming (RG)	A framework of policies, procedures, tools and practices intended to promote safe gambling behaviour and minimise gambling-related harm.
RG	Responsible Gaming
SOW	Source of Wealth, information establishing how a customer accumulated their overall wealth.
Vulnerable Person	Any individual at increased risk of gambling-related harm due to age, financial circumstances, gambling behaviour or other relevant factors.

1. POLICY OVERVIEW

Responsible Gaming ('RG') is held central at **Surwin B.V.** The Responsible Gaming Policy has been implemented to protect customers. **Surewin B.V** follows the terms set out in our licences issued by Curacao Gaming Authority (CGA').

Surewin B.V gambling operations are conducted in a sound and secure manner, with a high level of consumer protection with the aim of upholding our social responsibility, minimizing the risk of our customers developing gambling related disorders and finding themselves in financial social and/or psychological difficulties and ensuring gambling will not be used in connection with or to support criminal activity. **Surewin B.V** is entirely committed to protecting children and vulnerable people from being exposed to potential harm or exploitation from gambling.

Surewin B.V is also committed to measures to mitigate the harmful effects of gambling, such as preparation, support and encouragement of studies and research projects in the field of safer gambling.

Our Commitment

We affirm our responsibility to provide a safe, fair, and transparent gaming environment for all users. **Surewin B.V** does not provide, facilitate, arrange or extend credit to customers for the purpose of gambling or wagering activities.

In alignment with the CGA's mandate, we have developed and implemented a comprehensive Responsible Gaming Policy designed to:

- Promote customer protection and awareness
- Prevent gambling-related harm
- Mitigate the risks of problem gambling
- Support individuals who may be experiencing gambling issues

2. SCOPE

This policy applies to all employees, affiliates, marketing partners, and service providers associated with **Surewin B.V**, as well as all customers accessing our online casino platforms.

The Responsible Gaming Policy and Responsible Gaming webpage are made available in English and, where applicable, in the primary language(s) of the target markets in which the Company offers gambling services. In the event of any inconsistency between the English version and a translated version, the English version will prevail.

3. REGULATORY FRAMEWORK

Surewin B.V is committed to conducting its gambling operations in compliance with all applicable legal, regulatory and responsible gaming requirements and maintaining a safe gambling environment for customers.

3.1 Applicable Laws and Regulations

Surewin B.V will comply with all applicable laws, regulations, licensing conditions and regulatory requirements relating to responsible gaming and customer protection.

3.2 LOK Requirements

Surewin B.V will implement responsible gaming measures in accordance with the National Ordinance for Games of Chance (LOK) and applicable requirements issued by the Curaçao Gaming Authority (CGA), including player protection, customer monitoring, intervention measures and self-exclusion controls.

3.3 Internal Procedures and Standards

Surewin B.V maintains internal procedures and controls to support the implementation of this Policy, including customer monitoring, customer interaction processes, self-exclusion procedures, staff training and record keeping requirements.

4. GOVERNANCE AND RESPONSIBILITIES

Surewin B.V will maintain an effective governance framework to ensure the implementation, oversight and ongoing monitoring of responsible gaming measures and customer protection controls.

4.1 BOARD OVERSIGHT

The Board will ensure that adequate resources, systems and controls are implemented and maintained to support compliance with responsible gaming obligations and customer protection requirements.

4.2 RESPONSIBLE GAMING OFFICER

Surewin B.V has appointed Ricardo Jones to fulfil the role as Responsible Gaming Officer within the organisation. The Responsible Gaming Officer is responsible for implementing and enforcing this Policy.

The Responsible Gaming Officer will oversee responsible gaming activities, monitor the effectiveness of responsible gaming controls and provide a report to Executive Management at least annually regarding the effectiveness of this Policy and related procedures, including recommendations for any operational or policy enhancements.

Any material changes to this Policy will be reported to the Curaçao Gaming Authority (CGA).

4.3 STAFF RESPONSIBILITIES

All employees will complete required responsible gaming training, comply with this Policy and promptly escalate identified responsible gaming concerns through the appropriate channels.

5. RESPONSIBLE GAMING PRINCIPLES

Surewin B.V is committed to promoting responsible gaming practices and maintaining a fair, safe and responsible gambling environment. Surewin B.V will implement measures designed to prevent gambling-related harm, support informed customer decisions, protect vulnerable individuals and provide appropriate responsible gaming tools and customer protection controls.

6. PLAYER PROTECTION & VERIFICATION

6.1 AGE VERIFICATION PROCEDURE

Surewin B.V is committed to preventing underage gambling and applies age verification measures to all customers.

It is illegal for anyone under the age of 18, or such higher minimum legal age of majority as stipulated in the jurisdiction of residence, to open an account or to gamble and any such instance is treated with due care immediately.

Registration Controls

Before creating an account, customers must:

- Confirm that they are at least 18 years of age, or the legal gambling age in their jurisdiction of residence, whichever is higher.
- Accept the Terms and Conditions, including the age restriction requirements.
- Customers will not be permitted to deposit funds, place wagers or participate in gambling activities until age verification requirements have been sufficiently completed and the customer has been confirmed as meeting the applicable legal gambling age requirements.

Verification Process

To verify a customer's age, Surewin B.V may perform the following checks:

- Verification of the customer's date of birth provided during registration.
- Review of government-issued identification documents, including:
 - Passport
 - National Identity Card
 - Driver's Licence (where permitted)
- Cross-checking customer information against internal databases where available.

Trigger Events for Age Verification

Age verification will be conducted:

- During registration.
- On first withdrawal.
- Upon reaching a predefined deposit or transaction thresholds.
- Suspicious activity
- Where discrepancies or concerns regarding age are suspected/ identified.
- Where the customer is identified as potentially underage through manual review or customer interaction.

Should the person be verified as being over 18 from the day the account was registered, the account is allowed to be re-opened.

Any attempt to misrepresent one's age or submit falsified documents will result in account suspension or permanent closure and may be reported to the Curaçao Gaming Authority (CGA) or other relevant authorities.

6.1.1 PROCEDURE FOR IDENTIFIED MINORS

If, at any stage after registration, **Surewin B.V** identifies or reasonably suspects that a customer is under the legal gambling age, the following procedure will apply:

Immediate Account Restriction

- The customer's account will be immediately suspended.
- Deposits, withdrawals and gameplay will be blocked pending investigation.

Verification Review

- The customer will be requested to provide proof of age and identity.
- Acceptable documentation may include a passport, national identity card, or other government-issued identification.

Confirmation of Underage Status

- Where the customer is confirmed to be under the legal gambling age, the account will be permanently closed.
- The customer will be prohibited from opening any future accounts with **Surewin B.V** until they reach the legal gambling age.

Financial Review

- Any remaining deposited funds will be reviewed and returned in accordance with applicable legal and regulatory requirements.
- Winnings obtained through underage gambling may be forfeited where permitted by law and regulatory requirements.

Record Keeping

The incident will be documented within the Player Account Management System, including:

- Date identified
- Verification steps completed
- Actions taken
- Financial outcome

Surewin B.V will maintain records of age verification activities, including verification attempts and outcomes, in accordance with applicable record retention and KYC requirements.

Regulatory Reporting

- Where required by law or regulatory obligations, the incident will be reported to the Curaçao Gaming Authority.

Preventative Measures

- **Surewin B.V** will review the circumstances that allowed the underage individual to register and implement any necessary corrective measures to prevent recurrence.

6.1.2 PARENTAL CONTROLS

At **Surewin B.V**, we are strongly committed to protecting minors from exposure to gambling-related content. While we have measures in place to prevent underage access to our platform, we also encourage parents and guardians to take additional steps on their own devices.

Tips for Parents and Guardians

We recommend the following best practices to help safeguard children and young people in your household:

- Adults who share devices with minors should take all reasonable measures to prevent access to gambling services, including safeguarding usernames, passwords, payment methods and account credentials always.
- Customers should not save login details on shared devices and should ensure they log out after each gaming session.
- Use unique, private user accounts on shared devices.
- Enable parental controls on computers, phones, and tablets.
- Log out after each gaming session to avoid unintended access.
- Use filtering software:
 - Net Nanny – www.netnanny.com
 - GamBlock – www.gamblock.com
 - CyberSitter – www.cybersitter.com

If you suspect a minor has accessed your account, please contact our support team immediately.

6.2 VULNERABLE CUSTOMER IDENTIFICATION PROCEDURE

Vulnerable Person is defined in the Clause 1.1 (h) of the LOK as

1. Under eighteen years of age.
2. 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.
3. Has been banned from playing any Game of Chance either by force or at his or her own request.
4. Has been declared bankrupt.

Step 1 – Behaviour Monitoring

Customer activity is continuously monitored using automated and manual reviews to identify potential indicators of gambling-related harm, including but not limited to:

Step 2 – Vulnerability Assessment

Where one or more indicators are identified, the customer's account is reviewed by the Responsible Gaming Team or designated personnel.

The review considers:

- Gambling behaviour;
- Transaction history;
- Account activity;
- Previous Responsible Gaming interactions;
- Affordability indicators;
- Any customer disclosures relating to financial, emotional or mental wellbeing.

Step 3 – Risk Classification

Customers identified as potentially vulnerable will be assigned a risk rating of:

- Low Risk
- Medium Risk
- High Risk

The assigned risk level determines the level of monitoring, customer interaction and intervention required.

Step 4 – Account Flagging

Where a customer is identified as vulnerable, a Responsible Gaming flag will be applied within the Player Account Management System.

The flag will include:

- Date of review;
- Risk classification;
- Indicators identified;
- Actions taken;
- Follow-up requirements.

Step 5 – Intervention and Monitoring

Depending on the customer's risk profile, **Surewin B.V** may:

- Contact the customer directly;
- Recommend Responsible Gaming tools;
- Apply deposit, loss or wagering limits;
- Conduct affordability reviews;
- Suspend marketing communications;
- Restrict account functionality;
- Implement cooling-off periods;
- Apply self-exclusion or operator-imposed exclusion.

Step 6 – Ongoing Review

Flagged customers will be subject to ongoing monitoring and periodic review to determine whether additional interventions are required.

6.3 LIMITS

To support responsible gambling, customers must be given tools to help them stay in control of their spending. One of the key tools is the ability to set deposit limits, which allow customers

to manage how much money they can add to their account over a chosen period. These limits are designed to promote safe gambling habits and reduce the risk of harm.

6.3.1 DEPOSIT LIMITS

Surewin B.V provides customers with effective deposit limit tools to manage their gambling expenditure and maintain control over their gaming habits. These limits are both proactively available and strongly encouraged for all users.

Types of Deposit Limits - Customers may set the following types of deposit limits themselves from the platform:

- Daily Limit – Maximum deposit amount within a 24-hour period
- Weekly Limit – Maximum cumulative deposit amount over 7-days
- Monthly Limit – Maximum cumulative deposit amount over 30 days

Implementation Rules:

- Once a deposit limit is reached, the customer will not be able to deposit additional funds until the specified period resets.
- When a customer decreases their deposit limit, the change is applied immediately to offer instant protection.
- Any request to increase a deposit limit is subject to a mandatory 7 day waiting period.

Customers can also contact the customer support department via e-mail or chat if they wish to set up limits on their account, agents are to follow the following procedure: confirm limit type, amounts and duration before manually applying the limit in question should not already provided to them by the customer. The agent must then inform the customer of the limit, its activation date and duration. The customer is also once again informed of how to change the limit should they wish to reduce their limit further and the process that applies should they wish to increase or remove their limit.

Agents can also impose limits on customer's accounts, should this be identified as the appropriate action following an account review.

6.3.2 SETTING ACCOUNT LIMITS

Customer set limits

Customers can set their own deposit limits directly through the casino platform at any time. This self-service feature allows customers to manage their gambling in a way that suits their personal preferences and financial situation. Limits can be applied on a daily, weekly, or monthly basis and take effect immediately upon confirmation. This tool is available 24/7 under the Responsible Gaming section of the customer's account settings.

Customer assisted set limits

1. Receive the Request

- Customer contacts support via email or chat asking to set limits.
2. Confirm Details
 - If not already provided, ask the customer to confirm:
 - Type of limit (e.g., deposit limit)
 - Amount
 - Duration (daily, weekly, or monthly)
 3. Apply the Limit
 - Manually set the limit in the system based on the customer's request.
 4. Confirm with Customer
 - Tell the customer:
 - That the limit has been applied
 - When it will start
 - How long it will last
 5. Explain Changes
 - Remind the customer that:
 - They can make the limit stricter at any time, and it will take effect immediately
 - Any request to increase or remove the limit will have a waiting period 7 days
 6. Agent-Imposed Limits (if applicable)
 7. If a limit is set by the agent after an account review:
 - Apply the limit
 - Inform the customer why it was set and what it means

6.3.3 OTHER LIMITS

Surewin B.V's commitment to responsible gambling, customers are encouraged to set additional limits to help manage their gambling activity in a safe and sustainable manner. These limits are designed to provide customers with greater control over their gambling behaviour and reduce the risk of harm.

- **Loss Limits**

Allows customers to cap the maximum amount they are willing to lose over a defined period (e.g., daily, weekly, or monthly). Once the limit is reached, the customer will be restricted from further play until the next period begins.

- **Wager Limits**

Allows customers to set a maximum amount they may wager within a specified time frame. This helps control excessive betting behaviour and promotes mindful play.

- **Cooling off**

In accordance with duty of care and regulatory requirements, customers are offered different options to manage their access to their accounts: Temporary cool off

- Temporary self-exclusion
- Permanent self-exclusion

Temporary self-exclusion

The minimum time frame is 24-hour, a 7-day, 1 month or 3 months. Such closures are available for reactivation after a 7-day cooling-off period following a reopening request. This prevents the possibility of frequent closures and reopening.

Permanent self-exclusion

Customers may activate a self-exclusion period through the account settings. Self-exclusion options are available for a minimum period of one (1) year, with an additional option for lifetime self-exclusion. Once activated, the self-exclusion will apply across all brands, websites, domains and gaming verticals operated by **Surewin B.V** and the customer will be removed from all marketing and promotional communications for the duration of the self-exclusion period. Self-exclusion cannot be revoked before the selected exclusion period expires.

Application and Enforcement

- Limits can be set by the customer directly through the account settings or via customer support.
- Any request to decrease a limit will take effect immediately.
- Requests to increase or remove a limit will be subject to a cooling-off period before the change becomes effective, as an added safeguard.

Reality Checks - During gameplay, customers are provided with a real-time clock displaying their local time zone to assist them in monitoring the duration of their gambling activity.

Responsible Gaming Assistance and Contact Channels

Customers who have concerns regarding their gambling behaviour, wish to discuss Responsible Gaming tools, or require assistance in managing their gambling activity may contact **Surewin B.V** at any time through the following channels:

- Live Chat (via the website's "Live Helper" function)
- Email (using the Responsible Gaming contact details published on the website)

Responsible Gaming information, support resources, self-help tools, and contact details are available on the Responsible Gaming page. All Responsible Gaming enquiries are prioritised and, where appropriate, escalated to the Responsible Gaming Officer or designated Responsible Gaming Team for review and assistance.

6.4 SELF-ASSESSMENT

At **Surewin B.V**, we believe that gambling should always remain a form of entertainment - never a source of harm. As part of our commitment to proactive Responsible Gaming, **Surewin B.V** provides customers with the opportunity to assess their own gambling behaviour through confidential self-assessment tools available directly on our platform.

To support transparency and responsible gambling, **Surewin B.V** provides all registered customers with ongoing access to detailed information about their financial and gaming activity through their account dashboard.

Customers can log in at any time to view the following data:

- **Current Account Balances**
 - Real-time display of cash and bonus funds
- **Financial Transactions**
 - Full history of deposits and withdrawals, including timestamps and amounts
- **Gambling History**
 - A chronological record of all wagers placed, including:
 - Game names and session times
 - Bet amounts and resulting winnings or losses
 - Post-bet account balance
 - Total funds available (for continued wagering or withdrawal)

This information is displayed in a clear, chronological format, enabling customers to understand their gambling patterns and manage their activity more responsibly.

6.4.1 CUSTOMER SELF-ASSESSMENT

Surewin B.V provides customers with access to a Self-Assessment Questionnaire designed to help evaluate their gambling habits and identify signs of problem gambling.

Self-Check: 20 Key Questions

Customers are encouraged to ask themselves the following:

1. Have you ever lost time from work or education due to gambling?
2. Has gambling ever made your home life unhappy?
3. Has gambling affected your reputation?
4. Have you ever felt remorse after gambling?
5. Have you ever gambled to get money to pay debts or solve financial problems?
6. Has gambling caused a decrease in your ambition or efficiency?
7. After losing, do you feel you must return as soon as possible to win back your losses?
8. After winning, do you have a strong urge to return and win more?
9. Do you often gamble until your last funds are gone?
10. Have you ever borrowed money or sold items to finance your gambling?
11. Have you ever been hesitant to use "gambling money" for normal expenses?
12. Has gambling ever made you careless about the welfare of yourself or your family?
13. Have you ever gambled longer than you planned?
14. Have you ever gambled to escape worry, stress, or boredom?
15. Have you ever committed or considered illegal acts to finance your gambling?
16. Has gambling ever caused you to lose sleep?
17. Do arguments, disappointments, or frustrations trigger gambling behaviour?
18. Have you ever had the urge to celebrate good news by gambling a few hours?
19. Have you ever considered self-harm or suicide because of gambling?
20. Do you feel helpless or out of control when it comes to gambling?

Outcome Guidance

Answering "Yes" to 7 or more questions may indicate a risk of gambling-related harm. Customers are encouraged to seek support if they recognize patterns of concern.

Data Handling

- Results are anonymous unless the customer chooses to share the outcome.
- When shared, the results may prompt proactive outreach from the RG team to offer support.

Encouraged Use

Customers are encouraged to complete the self-assessment:

- Upon registration
- After significant deposit or loss activity
- If displaying irregular or high-risk gambling patterns
- Following a cool off or self-exclusion period

6.4.2 SUPPORT RESOURCES

Customers who indicate a potential gambling problem may be referred to professional help organizations, such as:

- Gamblers Anonymous – <https://www.gamblersanonymous.org>
- Gambling Therapy – <https://www.gamblingtherapy.org>
- BeGambleAware – <https://www.begambleaware.org>

Where local gambling support, treatment or counselling organisations are available within a customer's jurisdiction, **Surewin B.V** will make reasonable efforts to provide details of such organisations in addition to internationally recognised support services.

7. BEHAVIOR TRACKING

Our platform includes systems to monitor customer behaviour and detect patterns indicating potential gambling-related harm. The key behavioural indicators monitored include, but are not limited to:

- Deposit and wagering frequency – sudden increases or erratic deposit, wagering or gaming session patterns.
- Extended or repeated gaming sessions with minimal breaks.
- Escalating bet amounts or chasing losses.
- Emotional or distressed communication with support staff.
- Attempts to reverse self-exclusion or ignore limits.
- Reversing withdrawals – customers cancelling withdrawal requests multiple times.
- Distressed or emotionally charged communications with staff
- Use of multiple payment methods – particularly attempts to bypass limits
- 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.
- Customers maxing out a credit card and attempting to register additional cards.
- Attempts to open multiple accounts to bypass deposit or loss limits.
- Customers under 25 years old spending substantial amounts, particularly on casino or virtual games.

- Unrealistic spending patterns that do not align with the customer's demographic profile.
- Repeated failed deposits or payment declines, particularly where indicative of insufficient funds, are treated as a potential indicator of gambling-related harm.

Notifications may be triggered by behavioural indicators including, but not limited to:

- High deposit frequency or value;
- Significant increases in gambling activity;
- Extended gambling sessions;
- Repeated failed deposit attempts;
- Withdrawal reversals;
- Frequent bonus requests;
- Frequent changes to Responsible Gaming limits;
- Attempts to circumvent Responsible Gaming controls;
- Other indicators identified during customer monitoring.

Such notifications may:

- Remind customers of the time and money spent gambling;
- Encourage the use of Responsible Gaming tools;
- Recommend cooling-off periods;
- Encourage customers to review their gambling activity;
- Provide information regarding support services;
- Encourage customers to contact customer support for assistance.

The content and frequency of notifications will be proportionate to the level of risk identified and may form part of a broader Responsible Gaming intervention strategy.

8. CUSTOMER IDENTIFICATION AND INTERVENTION

Gambling related harm can affect people from all age groups, income groups, cultures or professions. And while some people develop gambling problems over an extended period, others develop them in very short periods of time.

Some people may chase losses, some may be caught in the excitement or gamble when feeling angry/upset/lonely, others may view gambling as an escape or relieve from problems in their lives. All of these can be signs of occasional gambling leading to a gambling habit, which can in turn lead to financial, social and/or legal problems.

If the customer finds or describes themselves as fitting into some of the situations described below, they are indicators of problem gambling:

- I am playing too much;
- I am spending too much;
- I want to quit/stop gambling;
- I am losing too much;
- I am spending too much time gambling;
- I want or need to stop;
- I cannot afford to play/gamble anymore;
- I have lost so much;
- It is becoming a problem/affecting me;
- I am not enjoying myself;
- I am trying to win my money back;
- My wife/husband/family/friends want me to stop/close my account.

Customer Profiling and Risk Assessment

Surewin B.V provides staff with the required training material to be able to handle problem gambling situations, the analysis of customers' accounts should help to draft customers' profiles to identify if the customer can afford their gambling from both a financial and/or psychological perspective or if they may present signs of trouble. The review procedure should cover areas such as, but not limited to, the below to determine if any action or interaction is required:

- Source of wealth;
- Deposit patterns;
- Affordability;
- Gameplay pattern;
- Previous Cool Offs;
- Previous self-exclusions;
- Changes in financial limits;
- Contacts for bonus request;
- Abusive behaviour on chats, e-mail or phone;
- Complaints that products are "rigged" and other RG indicators.

Risk-Based Monitoring

Surewin B.V applies a Risk-Based Approach (RBA) to identify, assess, monitor and manage gambling-related harm. Customers are assigned a risk profile based on behavioural indicators, affordability assessments, transaction patterns, account activity and customer interactions.

Low Risk

Indicators may include:

- Consistent gambling behaviour
- No affordability concerns
- Limited Responsible Gaming indicators
- No previous interventions

Action:

- Routine monitoring.
- Responsible Gaming tools promoted periodically.

Medium Risk

Indicators may include:

- Increased deposits or wagering activity
- Extended gaming sessions
- Frequent bonus requests
- Multiple failed deposits
- Withdrawal reversals
- Frequent limit changes

Action:

- Enhanced monitoring.
- Direct customer interaction.
- Consideration of affordability review.
- Recommendation of Responsible Gaming tools.

High Risk

Indicators may include:

- Evidence of loss chasing
- Significant affordability concerns
- Multiple Responsible Gaming indicators
- Self-disclosed gambling difficulties
- Distressed communications
- Attempts to circumvent Responsible Gaming controls

Action:

- Immediate Responsible Gaming review.
- Mandatory customer interaction.
- Account restrictions, deposit limits or suspension.
- Self-exclusion where necessary.

Risk classifications are reviewed regularly and may be adjusted based on customer behaviour.

Customer Interactions

When necessary, customers should be contacted to provide further information about their specific circumstances, such as KYC and documentation, the amount of money they are willing to spend in gambling, and if they feel in control of their gambling. This interaction should be documented within the Player Account Management System, including indicators of concern and actions taken.

KYC is requested when customers hit the 4,000 NAF (€2,000 Euro) threshold.

Each risk group of customers has a grace period to provide the KYC:

- Low Risk customers - 30 days
- Medium Risk customers - 30 days
- High Risk customers - 30 days

If the KYC is not provided by the end of the grace period, the customer's account will be restricted:

- Deposits
- Withdrawals
- Gameplay blocked

Upon reaching certain thresholds, customers will be requested to submit further SOW documentation. This includes for example:

- Payslips
- Contract of employment
- Proof of inheritance
- Proof of gambling winnings
- Sale of property.

By collecting such documentation **Surewin B.V** will be ensuring that the customer affords his level of spending. If it's noticed a discrepancy between the level of spending and customer's affordability, the customer Risk Team will limit the customer's account and reach out to the customer.

The SOW document is required at thresholds.

If the documentation is not provided by the end of the grace period, the customer's account will be restricted: deposits, withdrawals and gameplay blocked.

For further detailed information, please refer to the AML policy.

In the case where an interaction is required, it's important to identify the type of information that will be the most relevant to that specific customer and situation to prevent any harm or help the customer to control their gambling or level of expenditure.

Types of information that should be considered:

- responsible gambling tools available to customers;
- direct a customer to dedicated responsible gambling organisations from where they can get further information and help regarding problem gambling;
- reminder of responsible gambling tools and/or contacts of organizations;
- direct suggestion to apply a financial limit;
- information that an affordability limit has been applied and what changes can be applied;
- gambling and transaction history functionality;
- probing questions about affordability of money and time spent gambling;
- probing question about the customer's control over their gambling;
- reasons for cancelling withdrawals;
- reasons for using multiple deposit methods;
- reasons for multiple declined deposits.

Above all, it's important that the interaction is an honest concern for customer wellbeing and an encouragement to act responsibly and not simply a form of fulfilling a regulatory requirement.

Research shows that safe environments in which customers feel protected, cared for and welcomed, promotes voluntary setting of limits, helps enable behavioural change and minimizes harm to those customers.

Responsible Gambling Interventions

Surewin B.V maintains clear internal guidelines for escalating Responsible Gaming concerns.

a. Deposit Limits

- Apply limits to the customer's account if erratic or excessive spending patterns are observed.
- Notify the customer of the limit and the reason for its application.

b. Temporary Suspension

- Suspend the account temporarily while conducting a further RG review, particularly if multiple indicators are present or the customer is unresponsive to initial outreach.
- Inform the customer of the reason and next steps.

c. Exclusion in Cases of Extreme Risk

- Where behaviour suggests serious gambling harm (e.g. self-disclosure of addiction, repeated reversals, distressed language), the customer must be self-excluded immediately.
- Permanent exclusion may be required in cases of confirmed gambling addiction or continued harm despite prior interventions.

Affordability

The consideration of the affordability concept has to account for the fact that different people have different amounts of income available and have different expenses, financial commitments or plans. As a result, some customer's may reach their affordability level quicker than others. In essence, overspending occurs when the customer's deposits are disproportionately high relative to their income.

Affordability assessments are conducted on a risk-sensitive basis taking into account customer income, source of wealth, expenditure patterns and other relevant information. Limits may be imposed where gambling expenditure appears disproportionate to the customer's known financial circumstances.

If a lower limit is in place, the value should not be increased unless further supporting documentation is submitted by the customer, to prove a higher affordability, alongside their request to raise the limit.

Such internal measures seek to minimize the likelihood of customers finding themselves in financial difficulty because of their gambling. Should a customer be found to be overspending, a monthly net loss limit should be setup by the agent based on the customer's declared and documented source of wealth. That limit can be reduced further at any point with immediate effect should the customer decide to, but it cannot be increased or removed unless further source of wealth documentation is provided and accepted by us. Once such a limit has been implemented, the customer should be informed of the reasons for such and the conditions under which it can be changed.

Gambling products do not actively encourage customers to chase their losses, increase their stake or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they wish to stop.

Customer Interaction and Logging Procedure

As part of the licensing requirements, **Surewin B.V** has implemented policies and procedures for customer interaction where we have concerns that a customer's behaviour may indicate problem gambling.

Surewin B.V is constantly trying to improve the relationship with customers and understands the importance to interact with customers in a timely and meaningful way as part of the safer gambling commitment.

Customer interactions occur at the point at which a member of staff provides guidance and advice to relevant sources of guidance and advice regarding potential gambling related harm. This can be initiated either by the customer or by the staff member approaching the customer, including when pro-actively initiating the process for self-exclusion.

When initiated by a staff member, the account will be reviewed to try and understand customer gambling patterns and behaviours at a first stage.

The staff member will try to contact the customer via email to make the customer aware of the concerns and promote positive change. If the Risk Team is unable to contact the customer, limits will be imposed in the account or the account suspended until they are able to reach the customer.

If at any stage a customer directly discloses that they suffer from pathological gambling/ gambling disorder/ gambling addiction, then the account is to be immediately self-excluded permanently.

High-Value (VIP) Customers

Surewin B.V implements specific provisions in relation to customers which may be designated as high-value or VIPs. **Surewin B.V** operations department has dedicated staff which coordinates VIP matters, including the provision of responsible gambling measures for any such customers. All VIP customers are tagged as such within the Backoffice system, and all customer contacts must be logged.

Upon a customer being identified as a potential 'VIP', dedicated staff will endeavour to make contact as soon as practicable to discuss questions relating to the customer's account activity, based on several factors such as:

- Size of deposits / wagers placed.
- Frequency of deposits.
- Frequency and extent of both winnings and losses.
- Source of funds / Source of wealth relating to deposits.

Surewin B.V policy is that such initial VIP contact is made by email, provided the customer has consented to such method of contact, or alternatively, by live chat. VIP customers remain tagged for their lifetime so that staff is aware of the customer's history.

The objective of **Surewin B.V** initiating such contact is to establish any potential gambling issues or so called 'red flags'.

Responsible Gaming interactions conducted by the VIP department are recorded and quality assured by the QA Team ensuring that key areas have been covered and that the customer is not at risk. VIP teams will receive focused training sessions on how to deal with Responsible Gaming interactions. VIP department will escalate accounts to the Risk Team where they identify that a customer may be at risk, vulnerable or being harmed by gambling. Where a customer has been flagged for an interaction, The Risk Team will interact with the customer.

Self-harm Threats

If a customer gives any indications of feeling suicidal or committing self-harm, or openly mentions it, agents are asked to take every threat seriously and immediately action the following:

- If the contact is by chat or phone, stay calm and listen, let the customer talk about their feelings. Accept what they say and don't pass judgment or try to solve the problem. Pass on information about available help centres should it feel appropriate.
- Contact the police as soon as practicable – if necessary, ask a colleague or manager to make the call if you are still in communication with the customer. Call must be recorded for audit trail purposes.
- Self-exclude the customer permanently and include a clear note in the account about the problem and steps taken.
- Inform the customer by email about the permanent self-exclusion and available help centres aimed at treating persons experiencing gambling problems.

Contact from Family Members

Should a family member or a friend of one of the customers contact the Customer Support department wanting to get the customer's account blocked or self-excluded (or any other type of restriction for that matter), the agent is to do the following:

- Inform the person making the contact that we cannot confirm or deny if another person has an account with us.
- Collect all information about the potential customer and say that all you can do is investigate internally and act as per findings.
- Provide the person with details of the available help centers aimed at treating people and respective families experiencing gambling problems.
- With the information provided, investigate any existing accounts and take the claims very seriously. Such requests origin most of the time from real problems, so if in doubt lean towards problem gambling.

9. COOLING OFF

In accordance with duty of care and regulatory requirements, customers are offered different options to manage their access to their accounts: Temporary Cool Off

- Temporary self-exclusion
- Permanent self-exclusion

From the moment a customer has self-excluded from gambling, be it temporary or permanent, the customer is removed from all marketing communications mailing list templates within 48 hours (unless they are already in the process of being dispatched). This means that any customers who have opted to take positive action against their gambling problems will not receive any promotional material.

9.1 AVAILABILITY AND ACCESSIBILITY

Temporary Cool Off - The cool off is there for customers to take a break from gambling or to close their account on a temporary basis.

- The minimum time frame is 24-hour, a 7-day, 1 month or 3 months.
- Upon expiry of the selected Cooling-Off period, customer accounts will automatically reactivate without requiring additional action from the customer.
- This prevents the possibility of frequent closures and reopening.

- Customers selecting a cooling-off period will automatically be excluded from all marketing and promotional communications for the duration of the cooling-off period.
- Marketing communications may only resume once the cooling-off period has ended and where the customer remains eligible to receive such communications.

Customers may activate a Cooling-Off period directly through their account without operator approval.

Cool Off Request Handling Process (Chat or Email)

Step 1: Acknowledge the Request

- Politely acknowledge the customer's request for a Cool Off.
- Inform the customer that you will need to ask a few questions to process the request.

Step 2: Assess and Action the Request

- If the customer does *not* indicate RG concerns:
 - Proceed to close the account in the Player Account Management System.
 - Leave a clear note on the customer's account detailing the reason for the Cool Off as stated by the customer.
- If the customer *does* indicate RG-related issues:
 - Follow the Responsible Gambling escalation procedure
 - Ensure proper documentation of all indicators and escalate the case if necessary.

Step 3: Confirm and Inform the Customer

- Confirm the Cool Off has been actioned.
- Inform the customer:
 - Whether the Cool Off can be revoked
 - What the Cool Off means, including its duration and impact on account access.
 - Where applicable, remind them of available responsible gambling resources or support tools.

If a customer discloses additional information that suggests potential responsible gambling issues, additional information about RG tools and self-exclusion should be provided to the customer. Depending on the case, the agent may also leave a note requesting the "RG tools" e-mail to be sent out to the customer upon account reopening. This e-mail informs the customer of all the available tools for limiting their own account, how to access these tools and support organizations should they wish to seek further advice (support). If at any stage a customer directly discloses that they suffer from pathological gambling/ gambling disorder/ gambling addiction, the account is to be immediately self-excluded permanently.

Responsible Gambling Disclosure Handling Process

Step 1: Listen for Additional RG-Related Information

- During any customer interaction (chat, email, etc.), remain alert to any additional information disclosed by the customer that may indicate:
 - Struggles with gambling control

- Emotional or financial distress due to gambling
- Mention of RG concerns

Step 2: Provide Supportive Information

- If such information is disclosed:
 - Provide the customer with details about available Responsible Gambling (RG) tools, such as:
 - Deposit limits
 - Cool Off
 - Wager Limits
 - Loss limits
 - Self-exclusion options
 - Share contact details for professional support organisations, where applicable.

Step 3: Document and Prepare for Follow-up

- Leave a note on the customer's account indicating the RG concerns raised.
- If the account is to be reopened in future:
 - Leave a request on the account for the "RG Tools" email to be sent upon reactivation.
 - This email must include:
 - A list of self-limiting tools
 - How to enable/access each tool
 - Details of third-party support services

Step 4: Immediate Permanent Self-Exclusion

- If a customer explicitly discloses:
 - Pathological gambling,
 - Gambling disorder, or
 - Gambling addiction,
 - Immediately self-exclude the account permanently.
- Clearly document the reason for permanent exclusion.
- Do not reopen the account under any circumstances unless instructed by the designated RG/Compliance Officer.

10. SELF-EXCLUSION

Surewin B.V is committed to supporting customers who experience difficulties in managing their gambling behaviour. The Self-Exclusion Program is a responsible gambling tool designed to empower individuals to take control of their gambling habits and minimize the risk of further harm.

Self-exclusions can be enforced on customer's accounts, should this be identified as an appropriate action following an account review.

Customers who have entered a self-exclusion, either voluntarily or involuntarily, will have the process of returning any funds held in their account(s) initiated within 24-hours.

Surewin B.V will maintain reasonable controls, monitoring procedures and account linkage mechanisms designed to identify and prevent self-excluded customers from opening duplicate, replacement or linked accounts during an active self-exclusion period.

10.1 SCOPE OF SELF-EXCLUSION

Surewin B.V will maintain reasonable controls, monitoring procedures and account linkage mechanisms designed to identify and prevent self-excluded customers from opening duplicate, replacement or linked accounts during an active self-exclusion period.

Any self-exclusion applied by **Surewin B.V** automatically extends to:

- All brands operated by the licence holder.
- All websites and domains operated by the licence holder.
- All gambling verticals, including casino, sportsbook, live casino, virtual games and any future gambling products.
- All marketing and promotional communications.

Customers subject to self-exclusion will not be permitted to access any gambling product offered under the licence during the exclusion period.

10.2 SELF-EXCLUSION RECORD AND RETENTION

All self-exclusion records must be securely maintained in a dedicated Self-Exclusion Register, which includes:

- Customer identification details
- Duration and type of exclusion
- Date of request and confirmation
- Notes on any related interactions

Surewin B.V will retain these records for a minimum of seven (7) years from the end of the exclusion period, in compliance with data protection and regulatory requirements.

10.3 SELF-EXCLUSION PROCESS AND REQUIREMENTS

10.3.1 TEMPORARY SELF-EXCLUSION

This option is available to customers who wish to close their account temporarily, for longer periods of time or due to gambling problems.

For customers, the self-exclusion will automatically block all accounts under the licence in which the self-exclusion is requested.

Customers can set up these temporary self-exclusions themselves for a duration from 1 year, with additional options for 3 years, 5 years, 10 years.

Once self-exclusion is confirmed, it cannot be revoked by the customer before the exclusion period ends.

After the self-exclusion period ends, request for the customer to confirm in writing their request before unblocking the account.

If a customer asks for a temporary self-exclusion via chat or e-mail, the agent is to do the following:

Temporary Self-Exclusion Request Handling Process (via Chat or Email)

Step 1: Acknowledge and Clarify

- Acknowledge the customer's request for temporary self-exclusion.
- Ask the customer:
 - The reason for requesting the self-exclusion.
 - The desired duration of the temporary exclusion.

Step 2: Action Based on Response

- If the customer provides a reason and duration:
 - Temporarily self-exclude the account using the Player Account Management System.
 - Leave a detailed note on the account stating:
 - The reason provided
 - The self-exclusion period
- If the customer does not provide a duration:
 - Send a confirmation email requesting the customer to specify the self-exclusion period.
 - If no reply is received, enforce a minimum exclusion period of 1 year.
 - In such cases, ensure a strong Responsible Gambling (RG) review is completed before any consideration of account reactivation.

Step 3: Confirm Self-Exclusion

- Once the account is self-excluded:
 - Confirm the closure and exclusion duration with the customer.
 - Clearly state the exact end date of the self-exclusion.

Step 4: Inform About Post-Exclusion Process

- Inform the customer of what to expect once the self-exclusion period ends, including:
 - After the self-exclusion period ends, request for the customer to confirm in writing their request to reopen the account before unblocking the account.
 - That the account will not be reactivated without a proper RG assessment.
 - The continued availability of RG tools and support resources upon return.

Upon a customer self-excluding, the following is to happen:

- All gambling-related transactions are to be blocked immediately.
- The customer's account will be deactivated, preventing further play.
- Excepting any funds frozen in accordance with the AML policy any remaining funds in the customer's account must be refunded to the original payment method within two business days.
- If there are no suitable payment details, use reasonable endeavours to contact the customer to acquire the payment details. In doing so, ensure no advertising or promotional material is sent.
- All contact must be very sensitively handled and access to the account should be blocked.
- The customer's account should be closed immediately, and it should not require the customer to access the account to request the withdrawal.

10.3.2 PERMANENT SELF-EXCLUSION

This option is the final step which customers and **Surewin B.V** may use to limit a customer's account. Once implemented, permanently self-excluded accounts cannot be reopened

under any circumstances, even if the licencing requirements would allow such. This means that this type of closure is typically implemented for higher severity responsible gambling cases or on customer's request.

Agents must take any requests for permanent self-exclusion extremely seriously.

In most cases, customers will ask for their account to be permanently self-excluded, however **Surewin B.V** reserves the right to permanently self-exclude customers, informing them immediately about such action via email, should they give clear indication of severe gambling related harm, pathological gambling/ gambling disorder/ gambling addiction, financial problems, potential self-harm risk or mental health problems.

For customers, the self-exclusion applies to all accounts under the licence in which the self-exclusion is requested.

If a customer asks for a permanent self-exclusion via chat or e-mail, the agent is to do the following:

Permanent Self-Exclusion Process

Permanent self-exclusion is a critical responsible gambling measure that allows customers to take control of their gambling by voluntarily excluding themselves from accessing their account indefinitely.

The process below outlines how staff must manage and document permanent self-exclusion requests:

1. Ask for the Reason
 - Ask the customer why they want to self-exclude.
 - Confirm that they want the self-exclusion to be permanent.
2. Action the Request
 - If confirmed, self-exclude the account permanently using the Player Account Management System.
 - Leave a note on the account with the customer's reason.
3. If Duration Is Not Stated
 - If the customer asks to self-exclude (e.g., via email) but doesn't mention the period:
 - Send a confirmation email asking how long they want to self-exclude.
 - Self-exclude the account using the Player Account Management System.
4. Once self-exclusion is confirmed, it cannot be revoked by the customer before the exclusion period ends.
5. Agents must confirm the account's permanent self-exclusion and inform the customer that there will not be a way to reopen the account.
6. The customers must be informed, upon self-exclusion, of available support organisations aimed at supporting people affected by gambling related harm.
7. Agents can also enforce self-exclusions on customer's accounts, should this be identified as the appropriate harm minimisation action following an account review.

Surewin B.V will not discourage customers from activating Self-Exclusion by:

- Questioning the customer's decision;

- Providing reassurances intended to delay the process;
- Offering bonuses, promotions or incentives;
- Delaying or obstructing implementation of the request.

10.4 FINANCIAL AND ACCOUNT MANAGEMENT

Customers who have entered a self-exclusion, either voluntarily or involuntarily, will have the process of returning any funds held in their account(s) initiated within 24 hours.

When Full Self-Exclusion Is Activated:

- All gambling activity must stop right away.
- The customer's account must be closed so they cannot play anymore.
- Any money in the account (unless frozen under the AML policy) must be refunded to the original payment method within two business days, following AML rules.
- The customer's information must be removed from all marketing and promotional lists permanently.

10.5 REACTIVATION AND POST EXCLUSION

To ensure customer safety and uphold our commitment to responsible gambling, **Surewin B.V** has implemented a structured and cautious reactivation process following the end of a self-exclusion period.

After Self-Exclusion Ends – Reactivation Process

1. Written Request Required
 - The customer must send a written request (e.g. via email or chat) asking to reopen their account.
2. Send Responsible Gambling Message
 - Before reactivating, send the customer a message that includes:
 - A reminder about responsible gambling
 - Info on available safeguards/tools (limits, cool off, etc.)
 - A link to the Gamblers Anonymous questionnaire
3. Preserve History and Reactivate Original Account
 - The customer's account history must be kept.
 - Only the original account can be reactivated – no new accounts.
4. Final Review and Reactivation
 - Make sure all steps are complete.
 - Then reactivate the account and leave a note on the Player Account Management System

10.6 MARKETING AND CONTACT RESTRICTIONS

Marketing and Contact Restrictions

During and after a self-exclusion (whether for some or all games):

- **Surewin B.V** must not contact the customer for marketing purposes while they are self-excluded.
 - The only contact allowed is for legal, account-related, or non-promotional reasons.
- **Surewin B.V** must not send any promotions, bonuses, or offers to the customer to try to get them to gamble again.
- Cool-off periods end automatically, but after self-exclusion, only the customer can choose to return.
- **Surewin B.V** must not invite or encourage the customer to start playing again.

11. TRAINING AND STAFF READINESS

To ensure the effective implementation of Responsible Gaming (RG) principles, Galactic Investments mandates comprehensive and ongoing training for all individuals and entities involved in the promotion, operation, and delivery of our gambling services.

This includes:

- Internal employees (customer support, operations, compliance, and product teams)
- Third-party affiliates and advertising partners
- Influencers and brand ambassadors
- External marketing agencies and social media managers

All third-party contractors, affiliates, ambassadors, influencers and marketing providers will receive, acknowledge and comply with the Responsible Gaming Policy as part of their contractual obligations.

Employee training - All employees receive Responsible Gaming training that includes:

- Initial Onboarding Training
- Legal and regulatory RG obligations
- Identifying signs of problem gambling
- Handling RG queries sensitively and appropriately
- Internal reporting and escalation protocols
- Recognition of gambling distress indicators and signs of customer vulnerability
- Conducting sensitive, structured and supportive conversations with at-risk customers
- Directing customers to appropriate Responsible Gaming tools and external support resources
- Appropriate escalation and intervention procedures for vulnerable customers

Ongoing and Refresher Training:

- Conducted at least annually, and whenever regulatory updates or operational changes occur
- Tailored content based on employee role and customer-facing responsibilities
- Case studies and practical scenarios to enhance awareness and preparedness

12. ESCALATION

If any signs of problem gambling are noticed, they must be reported to the Responsible Gaming Officer. The Responsible Gaming Officer will review the case and decide if the customer needs more limits, exclusion, or other responsible gambling support.

Escalating a case might be required due to several reasons:

- the agent suspects that the customer they are reviewing has possible gambling problems.
- the amount or velocity of deposits might indicate that the customer is playing beyond their means.
- the total deposited is above their declared earnings (consider if an AML or RG escalation).
- some of the documents provided raise potential problem gambling issues.
- the agent has RG doubts or concerns about an account.
- the customer is reluctant or refrains from providing any supporting documents to evidence the source of wealth information provided.
- cases that seem a bit different from the norm and need special review.

In any of the situations above the case should be escalated to a manager in order to peer review the case. Should any such suspicion be matched, or should it be deemed an extreme case that needs further review, the case should be immediately escalated to the Responsible Gaming Officer.

Accounts escalated to the manager should be accompanied by the customer's name, account number and a summary of the case. Further escalation should be accompanied by the following:

- Date registered.
- Total Deposits.
- Total Withdrawals.
- Net Deposits;
- SOW per month;
- Limits on account;
- Previous cool off or self-exclusion;
- RG concerns summary.

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

13. RECORD KEEPING

Surewin B.V maintains comprehensive records relating to Responsible Gaming activities including:

- Customer interactions and interventions
- Vulnerability assessments
- Risk classifications
- Cooling-off requests
- Self-exclusion requests
- Responsible Gaming limit applications
- Account restrictions and suspensions
- Internal escalation decisions
- Communications with customers regarding Responsible Gaming matters

All Responsible Gaming records will be securely retained for a minimum period of seven (7) years and will be made available to the Curaçao Gaming Authority upon request.

Recording of Responsible Gaming Interactions

All Responsible Gaming reviews, customer interactions, risk assessments, interventions, account restrictions, cooling-off requests, self-exclusions and Responsible Gaming decisions are recorded within the Player Account Management (PAM) system and retained in accordance with recordkeeping requirements.

Records accurately reflect:

- Date and time of interaction
- Reason for review
- Risk indicators identified
- Actions taken
- Customer responses
- Follow-up requirements

14. COMPLIANCE AND REGULATORY OBLIGATIONS

Surewin B.V is required to follow all responsible gambling rules and ensure that regulatory expectations are always met. This includes keeping accurate records and taking immediate action when issues arise.

Record-Keeping

- All self-exclusion activity and related actions must be documented in real time.
- These records must be kept securely and must be made available to the CGA (Gambling Control Authority) upon request.

Action When a Self-Excluded or Underage Customer Gains Access

If a self-excluded customer or a minor manages to access gambling services, the **Surewin B.V** must:

- Refund all deposits made during the exclusion period, within two business days, (excluding any funds held or frozen under the AML policy).
- Immediately block the customer's account to stop any further gambling.

Submit a report to the CGA within five working days, explaining:

- How the breach occurred,
- What steps have already been taken, and
- What changes will be made to prevent it from happening again.

15. OPERATOR-INITIATED EXCLUSION

Surewin B.V can exclude a customer if:

- The customer shows problem gambling behaviour.
- The customer attempts or engages in criminal activity on the platform.

All exclusions will be formally documented and kept for at least seven (7) years. These records must be available if requested by the CGA [Curacao Gaming Authority].

16. MARKETING AND ADVERTISING RESTRICTIONS

Surewin B.V is committed to promoting gambling responsibly. All advertising and marketing must be honest, fair, and not encourage harmful or excessive gambling.

The following rules apply to all forms of advertising and promotions:

No Misleading or Aggressive Ads

- Ads must not be excessive, false, or use pressure tactics.
- Promotions must be clear about what is being offered.

No Targeting of Vulnerable Groups

Ads must not be shown to:

- Self-excluded customers
- Minors
- Problem gamblers
- People in financial hardship

No Promises of Financial Gain

Ads must not suggest gambling is a way to:

- Make money
- Get rich
- Solve financial problems.

No Misleading About Skill or Chance

- Do not suggest that skill affects games of chance.
- Clearly state when games are based on luck.

No Emotional Manipulation

- Do not promote gambling to escape stress, sadness, or loneliness.

No Child-Friendly Content

- Avoid using cartoons, bright animations, or characters that appeal to kids.
- Ads must not show or include children.

No Use of Influencers Appealing to Minors

- Do not use celebrities or influencers who are popular with underage audiences.

No Sexual or Explicit Content

- Ads must not include sexual, suggestive, or adult content.

No Link to Harmful Behaviours

Do not associate gambling with:

- Drug use
- Smoking
- Alcohol
- Seduction or attractiveness

Bonus Offers

- Bonus terms must be clear and easy to understand.
- Do not use bonuses to encourage excessive gambling or make offers sound urgent or misleading.

17. RESPONSIBLE GAMING COMMITMENTS IN CONSUMER ADVERTISING

In addition to general advertising restrictions, **Surewin B.V** commits to promoting responsible gambling in all advertising and marketing efforts. The following rules apply to how responsible gaming should be included in consumer-facing advertising:

Responsible Gambling Messages

- All ads must include a clear and visible responsible gambling message (e.g., “Play Responsibly”, “Gambling can be addictive – please play responsibly”).

Offline Advertising

- Any print, TV, radio, billboard, or other offline ads must follow the responsible gambling standards of the media platform or channel, even if not legally required.

Online and Social Media

- Online ads must not target vulnerable individuals (e.g., minors, problem gamblers).
- All social media ads must:
 - Be clearly marked as coming from **Surewin B.V** as a gambling operator;
 - Be age-gated (only shown to users who are of legal gambling age).

Direct Marketing

- Emails, SMS, and app notifications must:
 - Include responsible gambling messages;
 - Never be sent to self-excluded customers or anyone who has set a gambling limit.

Affiliate Marketing

- **Surewin B.V** is responsible for making sure all affiliates follow responsible gambling rules.
- This must be enforced through:
 - Signed agreements;
 - Regular compliance checks;
 - Penalties or termination for affiliates who do not comply.

Social Media Influencers

- Any influencer promoting the **Surewin B.V** must:
 - Be over the legal gambling age;
 - Have an adult audience;
 - Not post sexual or provocative content;
 - Clearly state if they are promoting gambling.

Surewin B.V is responsible for any influencer's statements or behaviour, even if the promotion is unpaid.

Sponsorships

- Sponsorship deals must not appeal to vulnerable individuals, especially minors.
- Surewin B.V must ensure that:
 - Logos or branding do not appear on youth sports gear or at events for children;
 - All sponsorship materials include a responsible gambling message.

18. REVIEW AND COMPLIANCE

- This policy is reviewed annually or when regulatory changes occur.
- Compliance is monitored through internal audits and CGA inspections.
- Non-compliance incidents are reported and addressed promptly.