

LUCKYROO N.V.

Responsible Gaming Policy

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1. Purpose and Scope

Luckyroo N.V. (“the Company,” “we”), registered under number 163606, is dedicated to promoting a secure, fair, and socially responsible gaming environment. As a licensed operator (License No. OGL/2024/1371/0694) under the regulation of the Curaçao Gaming Control Board (GCB), we uphold stringent responsible gaming standards designed to protect players, prevent problem gambling, and maintain gaming as a safe and enjoyable form of entertainment.

Commitment to Player Protection

To uphold the industry’s best practices and comply with GCB regulatory standards, Luckyroo N.V. has embedded responsible gaming principles throughout its operations. Our approach includes:

- ✓ Seamlessly integrating responsible gaming safeguards across our platform to promote ethical play.
- ✓ Developing and maintaining a comprehensive Responsible Gaming Policy that meets regulatory expectations and adapts to evolving compliance standards.
- ✓ Ensuring transparency and accessibility by keeping the Responsible Gaming Policy available on the GCB Licensee Portal, where it undergoes regular regulatory review.
- ✓ Continuously assessing and refining our responsible gaming framework, using data-driven insights to improve player protection strategies.

Purpose and Implementation

This policy outlines clear guidelines, support resources, and intervention strategies aimed at helping individuals maintain control over their gambling activities. Through the implementation of structured preventative tools, self-exclusion mechanisms, and dedicated player support initiatives, Luckyroo N.V. demonstrates its unwavering commitment to promoting safe, responsible gaming. These efforts are designed to ensure full alignment with the regulatory standards set by the Curaçao Gaming Control Board.

2. Mandatory Player Protection Standards

To comply with the licensing requirements of the Curaçao Gaming Control Board (GCB), Luckyroo N.V. adopts a structured and proactive approach to responsible gaming, implementing comprehensive safeguards to protect players and mitigate gambling-related risks.

Required Responsible Gaming Protocols

In compliance with GCB regulations, the company integrates the following essential player protection protocols:

- a. Age Verification – Ensuring all players meet the legal gambling age requirement through robust identity authentication processes.
- b. Transparent Responsible Gaming Information – Providing clear and visible information across all platforms, allowing players to make informed decisions.
- c. Self-Assessment Tools – Offering evaluation tools that help individuals assess their gambling habits and identify potential risks.
- d. Mechanisms of Behavioral Monitoring – Utilizing tracking mechanisms to detect patterns of excessive gambling or risky behaviors.
- e. Options for Cooling-Off & Self-Exclusion – Allowing players to temporarily or permanently suspend their gambling activities when needed.
- f. Deposit Limits – Enabling players to set financial controls to better manage their gaming expenditures.
- g. Staff Training & Awareness Programs – Educating employees, affiliates, and marketing partners on the importance of responsible gaming principles.
- h. Ethical Marketing Practices – Ensuring that all advertising and promotional activities comply with responsible gaming standards, avoiding targeting minors, self-excluded players, or financially vulnerable individuals.

Responsible Gaming Oversight & Internal Governance

To maintain accountability and ensure continuous compliance, a Responsible Gaming Officer (RGO) will be appointed to oversee policy enforcement. Until an RGO is formally assigned, the Compliance Officer (excluding AML/CFT responsibilities) will assume oversight of responsible gaming initiatives. Their key responsibilities include:

- Conducting an annual review of the Responsible Gaming Policy to evaluate effectiveness.
- Submitting detailed reports to the Executive Management Team, outlining key findings and proposed improvements.
- Updating policies and regulatory filings in accordance with Curaçao Gaming Control Board (GCB) guidelines.

Player Protection Measures

To create a secure and controlled gaming environment, Luckyroo N.V. enforces a range of protective policies, including:

- Comprehensive Responsible Gaming Programs – Establishing structured guidelines that promote safe and ethical gaming practices.
- Educational Tools & Awareness Campaigns – Providing players with relevant information, risk assessment quizzes, and self-management options.
- Real-Time Behavior Monitoring – Implementing technology-driven systems to detect and flag potential problem gambling behavior.
- Regulatory Audits & Compliance Reports – Ensuring full transparency and adherence to licensing conditions, including routine reporting and policy updates.

By implementing these measures, Luckyroo N.V. reinforces its commitment to player safety, responsible gaming, and regulatory integrity, ensuring that gambling remains a controlled and enjoyable activity while prioritizing industry's best practices and compliance standards.

3. Information Access

Empowering players to make informed decisions and utilize support tools when needed is central to our responsible gaming strategy. Providing clear and readily accessible responsible gaming information is a fundamental part of Luckyroo N.V.'s dedication to player safety and ethical gambling practices.

Integration of Responsible Gaming Information

To facilitate seamless access to responsible gambling resources, Luckyroo N.V. embeds essential information and support mechanisms throughout its website and gaming platform.

- Homepage Visibility – The Responsible Gaming Policy is prominently featured on the homepage, allowing players to easily locate and review key information.
- Multilingual Support – The policy is available in English and other major languages to accommodate players from diverse backgrounds.
- Quick Access to Player Protection Tools – Players can immediately access a range of responsible gaming features, including:

- a. Self-exclusion options to restrict gambling access for a set period.
- b. Cooling-off periods for temporary gaming breaks.
- c. Deposit limits to help regulate financial engagement in gaming.

Support Contact Information – Players have direct access to responsible gaming assistance via email and live chat, ensuring they can seek help when necessary.

Responsible Gaming Guidelines and User Agreement

To strengthen regulatory compliance and enhance player awareness, the Responsible Gaming Policy is explicitly referenced within the Terms & Conditions:

- a. Players are made fully aware of their responsible gaming options and tools.
- b. The Terms & Conditions remain easily accessible and can be navigated within a single click from the homepage.
- c. Players can review key responsible gambling guidelines at any time.

Compliance Highlights and Website Footer Content

As part of its commitment to responsible gaming, Luckyroo N.V. ensures that the website's footer section displays critical compliance and responsible gambling statements, including:

- a. A clear message prohibiting underage gambling (18+ only).
- b. The official name and registered address of Luckyroo N.V..
- c. The license number issued by the Curaçao Gaming Control Board (GCB).
- d. A statement confirming regulatory oversight under the GCB.
- e. A direct link to the Responsible Gaming Policy Statement for quick access.
- f. The GCB's official digital seal, affirming the company's commitment to compliance.

Player Support & Responsible Gambling Assistance

Luckyroo N.V. acknowledges the vital role of external support in promoting responsible gambling and offers direct links to reputable gambling addiction organizations. This ensures that players seeking professional help can easily connect with trusted support networks.

By making responsible gaming tools, educational materials, and access to support services readily available, Luckyroo N.V. underscores its dedication to regulatory compliance and player protection—placing ethical gaming and player well-being at the forefront of its operations.

4. Protecting Underage Gambling Through Age Verification

Luckyroo N.V. strictly enforces age verification protocols to prevent underage gambling and ensure full compliance with the regulations set forth by the Curaçao Gaming Control Board (GCB). Players must confirm that they are at least 18 years of age before being allowed to register, deposit funds, or place wagers. Any account identified as belonging to a minor will be immediately restricted, and appropriate measures will be taken to block further access.

Age Verification Procedures

To verify a player's age and confirm eligibility, Luckyroo N.V. follows a comprehensive multi-step process:

1. Declaration of Legal Age – During the registration process, players are required to provide their date of birth and confirm that they are 18 years or older.
2. Verification of Government-Issued ID – Players must submit a valid passport, national ID card, or driver's license to verify their age once Know Your Customer (KYC) or Anti-Money Laundering (AML) thresholds are triggered.
3. Validation of Payment Method – When applicable, verification of credit cards or other approved payment methods may serve as an additional layer of age confirmation.

Actions Taken Against Underage Accounts

If an account is suspected of belonging to a minor, immediate steps are taken to prevent access until verification is completed. If underage gambling is confirmed:

- a. The account is permanently closed to prevent further access.
- b. Deposited funds are refunded (except for cases involving AML restrictions).
- c. All winnings are forfeited in accordance with regulatory guidelines.
- d. A formal notice is sent to the underage individual, explaining the reason for account closure.

Enhanced Security & Additional Verification Measures

To further strengthen our age verification process, additional security checks may be implemented when necessary:

- Secondary verification methods, such as:
 - a. Proof of address validation via utility bills or bank statements.
 - b. Selfie verification, requiring the player to submit a photo holding their identification document.
 - c. Third-party database checks to cross-reference player details.

- Proactive age verification before key KYC or AML milestones, if there is any doubt regarding a player's age.
- Comprehensive record-keeping of all age verification attempts, with logs available for regulatory audits when requested.

Parental Controls & Internet Filtering

To assist in preventing minors from accessing gambling websites, Luckyroo N.V. encourages parents and guardians to take preventative measures, including:

- ✓ Securing devices, login credentials, and stored payment methods to prevent unauthorized access.
- ✓ Utilizing trusted parental control software to block gambling websites, such as:
 - Net Nanny (www.netnanny.com)
 - GamBlock (www.gamblock.com)
 - CyberSitter (www.cybersitter.com)

Commitment to Responsible Gaming & Compliance

Luckyroo N.V. is dedicated to fostering a safe and responsible gaming environment by implementing rigorous age verification protocols and offering parental control resources. These efforts are designed to shield minors from any exposure to gambling activities and ensure full compliance with the regulatory standards set by the Curaçao Gaming Control Board.

5. Temporary Measures for Ongoing Player Restrictions

At Luckyroo N.V. we offer accessible and instant cooling-off options, allowing players to temporarily step away from gambling whenever they feel it is necessary. This feature enables individuals to pause their gaming activity without unnecessary delays or obstacles, supporting responsible gambling practices. If technical modifications are required to enhance this feature, manual processing of cooling-off requests will be facilitated until an automated solution is fully operational.

A comprehensive self-exclusion program is designed to help players regain control over their gambling behavior and mitigate potential gambling-related harm. This self-exclusion feature is readily accessible, takes immediate effect upon request, and applies across all platforms and gaming services operated by Luckyroo N.V.

5.1 Cooling-Off Periods

Players have the option to activate a temporary gambling restriction for a duration of:

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

The cooling-off feature is prominently displayed on the platform and can be activated instantly with a single click, requiring no manual approval or email request. This restriction may be applied across specific gaming categories or all gambling activities on the platform.

Immediate Restrictions Upon Activation

Once a player selects a cooling-off period, the following actions take effect immediately:

- ✓ The player is notified about the difference between a Cooling-Off period and Self-Exclusion, with an option to opt for a longer self-exclusion period if desired.
- ✓ The account is temporarily locked, preventing the player from engaging in any gambling activities for the chosen duration.
- ✓ The player has the option to disable marketing communications for the duration of the cooling-off period to avoid receiving promotional material.

Prohibition of Discouraging Player Actions

Luckyroo N.V. strictly prohibits any attempts to discourage players from initiating a cooling-off period. The following practices are not permitted:

- ✓ Questioning a player's decision or attempting to persuade them to reconsider.
- ✓ Imposing unnecessary delays in processing the request.
- ✓ Providing incentives such as bonuses or promotions as a way to encourage continued gambling.

Account Reactivation & Additional Responsible Gaming Options

- ✓ At the conclusion of the cooling-off period, the player's account is automatically reactivated, allowing them to resume gaming without further action.
- ✓ If a player determines that they need longer-term restrictions, they are encouraged to explore options such as extended cooling-off period or self-exclusion programs.

By ensuring that cooling-off periods are player-driven, interference-free, and immediately effective, Luckyroo N.V. reinforces its commitment to responsible gaming and player protection, ensuring full compliance with Curaçao Gaming Control Board (GCB) regulations.

5.2 Self-Exclusion Periods

Players can activate self-exclusion directly through a clearly displayed option on the website, where they will find:

- ✓ A step-by-step guide on how to self-exclude.
- ✓ Available self-exclusion duration options and their implications.
- ✓ An explanation of the benefits of self-exclusion, emphasizing its role in preventing problem gambling and maintaining responsible gaming habits.

The self-exclusion process is fully automated, eliminating the need for email requests or manual approval. The system is designed for efficiency, ensuring that players can complete the request within 15 minutes.

Prompt and Final Action

Once a self-exclusion request is submitted, the following restrictions are instantly applied:

- a All gambling access is revoked, and the player's account is immediately locked.
- b Deposits, wagers, and withdrawals are blocked for the duration of the exclusion period.
- c All known payment methods used by the player are also blocked, preventing circumvention of restrictions.
- d The player's information is added to the Self-Exclusion Register, where records are kept for a minimum of seven years after the exclusion period ends.
- e Players are encouraged to extend their self-exclusion to other gambling sites, further reinforcing their commitment to responsible gaming.
- f Measures are in place to detect and block duplicate accounts created by self-excluded individuals.

Self-Exclusion Duration Options

In line with Clause 5.4(2) of the LOK, players can choose to self-exclude for:

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

Once a self-exclusion request is activated, it cannot be reversed before the selected exclusion period expires.

Prohibited Actions During Self-Exclusion Requests

Luckyroo N.V. enforces a strict policy against discouraging players from self-exclusion. The following actions are not permitted:

- ✓ Questioning a player's decision or persuading them to reconsider.
- ✓ Causing unnecessary delays in processing the self-exclusion request.
- ✓ Offering bonuses, incentives, or promotions to influence the player to continue gambling.

Players may opt to exclude themselves from specific gaming categories or apply restrictions across the entire platform depending on their needs.

Financial & Account Management During Self-Exclusion

For players opting for full self-exclusion, the following actions take effect:

- a. All gambling-related transactions are blocked immediately.
- b. The player's account is deactivated, restricting further gameplay.
- c. Any remaining funds (excluding those restricted due to AML policies) are refunded within two business days.

The player's details are permanently removed from marketing and promotional databases.

For partial self-exclusion (restricting specific game types but not all), gambling and wagering are blocked only for the selected gaming verticals.

Post-Exclusion Reactivation & Account Restoration

Once the self-exclusion period ends, the player must:

1. Submit a written request confirming their intent to reactivate their account.
2. Receive a responsible gaming advisory message, reminding them of available safeguards.
3. Be encouraged to complete a self-assessment to evaluate their readiness to resume gambling.

The player's account history remains intact, and reactivation is only permitted under their original account credentials, preventing duplicate registrations.

Marketing & Contact Restrictions During Self-Exclusion

During and after self-exclusion:

- ✓ Luckyroo N.V. will not send promotional materials or gambling-related incentives.
- ✓ The player will not be contacted for gambling-related activities, except where legally required (e.g., account security notices).
- ✓ Unlike cooling-off periods, self-exclusion requires the player to actively request reactivation once the exclusion term expires.

Regulatory Compliance & Reporting

All self-exclusion requests and interventions are documented in real time. If a self-excluded player or minor is found gambling, the following actions will be taken:

- ✓ The player's account will be immediately blocked.
- ✓ Deposited funds will be refunded within two business days, except for cases restricted under AML policies.
- ✓ A detailed report will be submitted to the GCB within five working days, outlining the breach and corrective actions taken.

Operator-Initiated Exclusion

If a player demonstrates high-risk gambling behaviors, Luckyroo N.V. reserves the right to proactively exclude them from the platform as an intervention measure. Grounds for operator-initiated exclusion include:

- ✓ Compulsive gambling patterns or signs of addiction.
- ✓ Financial distress linked to excessive gambling activity.
- ✓ Fraudulent or criminal activity associated with the player's account.

All operator-initiated exclusions are formally documented, with records maintained for a minimum of five years. The Curaçao Gaming Control Board (GCB) may request these records at any time for compliance verification.

By implementing a structured, transparent, and player-focused self-exclusion process, Luckyroo N.V. ensures strong player protection, regulatory compliance, and a safer gambling environment for all users.

6. Playtime Monitoring

At Luckyroo N.V we prioritize responsible gambling by promoting player awareness of gaming duration and financial engagement. We implemented special Reality Check tool – Real-Time Session Tracking to help players monitor their playtime and spending, enabling them to make informed decisions about their gambling activity.

To ensure players remain aware of their gaming activity, a persistent session timer is always displayed while they are logged into their account. This allows individuals to track their active play duration and assess whether they need to take a break or set gaming limits.

By integrating Reality Check, Luckyroo N.V. ensures that players remain informed and in control of their gambling activity, reinforcing responsible gaming principles while complying with Curaçao Gaming Control Board (GCB) regulations.

7. Responsible Gambling Controls: Deposit Limits

The Company places strong emphasis on responsible gambling by offering players the ability to set personalized financial limits. These tools empower individuals to manage their spending and gaming behavior responsibly, helping to prevent excessive play and supporting industry's best practices for safe and sustainable gaming.

Custom Deposit Limit Features

Players can establish personalized financial restrictions by setting daily, weekly, or monthly deposit limits, ensuring that they stay within their preferred gambling budget.

- a. Once the limit is reached, no further deposits can be made until the selected period resets.
- b. Stricter deposit limits can be applied at any time, and these adjustments take immediate effect to enhance player protection.
- c. Requests to increase a deposit limit are subject to a mandatory seven-day waiting period, allowing players to make well-considered financial decisions.

Exceptions & Pending Wager Considerations

In some cases, when a deposit limit or self-exclusion request is activated, ongoing wagers or active gameplay may be allowed to conclude before restrictions take full effect. These exceptions include:

- a. Players participating in an active poker tournament when a time limit is reached.
- b. Unresolved ante-post bets on future events, where wagers remain valid until the outcome is determined.

During these scenarios, while new deposits and bets will be blocked immediately, the system will allow active bets or gameplay to conclude before fully enforcing the restriction.

Ensuring Ethical Gambling and Compliance Integrity

By integrating customizable deposit limits and additional safeguards, the Company ensures that players have the necessary tools to gamble responsibly, while also maintaining full compliance with Curaçao Gaming Control Board (GCB) regulations.

8. Responsible Advertising and Promotional Oversight

The Company is committed to ensuring that all marketing, promotional, and advertising activities align with responsible gaming principles and do not encourage excessive or reckless gambling behavior. Our advertising approach emphasizes transparency, fairness, and player protection, ensuring that misleading content or unethical marketing tactics are never used.

Additionally, all marketing efforts must exclude minors, self-excluded players, and financially vulnerable individuals. All business partners, including affiliates, influencers, and VIP representatives, are required to follow strict responsible gaming guidelines.

Responsible Advertising Standards

To maintain compliance with Curaçao Gaming Control Board (GCB) regulations, Luckyroo N.V. enforces strict advertising policies, which include the following restrictions:

- a. No deceptive or aggressive marketing tactics – All advertisements are clear, truthful, and non-coercive.
- b. No targeting of vulnerable individuals – Promotions are not directed at minors, self-excluded players, or individuals exhibiting problem gambling behaviors.
- c. No portrayal of gambling as an investment strategy – Advertising does not suggest that gambling is a means to generate income, pay off debts, or achieve financial success.

- d No misrepresentation of chance-based games – Marketing does not imply that player skill can influence the outcome of games of chance.
- e No emotional manipulation – Gambling is not presented as a solution to stress, depression, or personal struggles in Luckyroo N.V.'s marketing materials.
- f No child-friendly content – Cartoons, animations, or other youth-targeted visuals are not used in Luckyroo N.V.'s marketing materials.
- g No use of celebrities or influencers with significant underage audiences – Social media personalities or entertainers with a following of minors are not used for Luckyroo N.V.'s gambling promotions.
- h No explicit or suggestive content – Gambling advertisements avoid sexually provocative or inappropriate imagery.
- i No association with high-risk behaviors – Luckyroo N.V.'s gambling promotions are not linked to activities such as smoking, drug use, or excessive alcohol consumption.

Bonus Promotions & Transparency

To ensure fairness and clarity, all bonus offers and promotions are communicated with full transparency:

- a Bonus terms and conditions are explicitly stated and easy to understand.
- b Promotions do not encourage excessive gambling or suggest that players can recover losses by continuing to wager.
- c Marketing campaigns do not mislead players regarding bonus eligibility, wagering requirements, or payout conditions.

Commitment to Responsible Gaming in Advertising

To reinforce awareness of responsible gambling, Luckyroo N.V. ensures that all marketing materials include clear responsible gaming messages:

- a All advertisements display responsible gambling disclaimers and direct players to support resources.
- b Offline advertising complies with responsible gambling guidelines set by GCB and media platforms.
- c Social media gambling advertisements must be age-restricted and clearly labeled as gambling-related content.
- d Direct marketing campaigns (emails, SMS, push notifications) must exclude self-excluded players and individuals with gaming limits.

Affiliate & Influencer Marketing Compliance

Luckyroo N.V. holds affiliates, influencers, and marketing partners accountable for adhering to responsible gaming policies. To ensure compliance:

- a Affiliates must sign legally binding agreements enforcing responsible marketing guidelines.
- b Regular compliance audits are conducted to prevent misleading or unethical promotions.
- c Strict penalties are imposed for non-compliance with responsible gaming policies.

For social media influencers, additional requirements include:

- a Strict age verification to ensure that their target audience consists of adults.
- b No association with minors or vulnerable individuals.
- c Avoidance of sexually provocative or misleading gambling endorsements.

Sponsorship & Responsible Branding

All sponsorship and branding agreements must adhere to strict responsible gaming policies:

- a Sponsorship materials must not target minors or appear on youth-related merchandise.
- b Gambling-related branding must not be featured at events aimed at underage audiences.
- c Responsible gambling messages must be included in all sponsorship content.

By prioritizing responsible advertising, enforcing strict compliance, and maintaining transparency, Luckyroo N.V. ensures that all marketing efforts uphold ethical gaming standards while protecting players from misleading or excessive gambling influences.

9. Key Terminology and Definitions

Games of Chance: Gambling activities based on chance or limited player skill (e.g., poker, sports betting, casino games).

LOK: National Ordinance on Games of Chance – Curaçao's main gambling law covering licensing, compliance, and responsible gaming.

Marketing, Promotion, and Advertising: Strategies and media used to promote gaming services, including digital and traditional channels.

Mandatory Requirements: Core responsible gaming obligations that all licensed operators must follow based on their market and audience.

Operator: A licensed entity by the Curaçao GCB or holder of the Orange Digital Seal, authorized to offer games of chance.

Self-Exclusion: A voluntary player-initiated ban across all platforms under the same operator to prevent gambling participation.

Vulnerable Person: Individuals at risk of gambling harm, including minors, addicts, bankrupt individuals, or those legally barred from gambling.

10. Policy Review and Amendments

This policy is reviewed annually by the Board of Directors. Any amendments, driven by regulatory changes or operational requirements, are approved by the Board and disseminated to all relevant personnel.

