



RESPONSIBLE GAMING POLICY

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Responsible Gaming – Introduction

Trickless N.V. takes the issue of responsible gaming extremely seriously and we are dedicated to adopting a very clear position on the subject. We want everyone who enjoys playing our games to be entertained and in control.

Responsible gaming forms a fundamental part of our company's philosophy. We are committed to providing a safe, enjoyable, responsible gaming facility and providing our clients with the highest levels of user protection.

We encourage a socially responsible attitude to gaming within our industry, both with our licensees and within our own company, as we proactively seek to avoid any gaming-related issues while providing our services both fairly and legally.

Trickless N.V. is committed to working with gambling regulators and jurisdictions to ensure that our products are delivered and tested in line with the expectations of the regulatory authority, and that minors and other vulnerable people are not harmed or exploited by our products.

Whilst the majority of users will be unaffected by our products, we are aware as a socially responsible gaming and platform provider that we should take an active role in ensuring that we have taken all possible measures available to us to track, limit and prevent gambling from being a source of harm to the small number of users that may have developed a gambling problem.

Trickless N.V. employs several ways to guarantee that it meets the expectations laid out by the regulators by implementing very clear policies, procedures, and practices, and training about problem gambling and responsible play. Our staff are subject to regular training on the subject and exposed to the available tools and independent third-party help organisations that exist to prevent gambling from becoming an issue for the end user.

As a responsible and fair gaming operator, there are several ways in which we can ensure we create a fair and safe environment in which our clients and users may enjoy our products and games.

Including but not limited to the following:

1. Improving awareness and educating users and clients on responsible gaming practices
2. Protection of minors and other vulnerable individuals
3. User protection and self-help tools
4. Proactive detection of problem gaming issues
5. Internal training and procedures
6. External training and working with industry self-help organisations
7. Reporting and regular audits

Protecting the Vulnerable and underage from gambling

Trickless N.V. does not seek the custom from underage users, the vulnerable, or those who are actively self-excluded. We will actively seek to prevent them from gaining access to remote gambling at the point of account registration.

For those individuals who have identified that they may require support to stop gambling, Trickless N.V. has a variety of tools available to limit or stop the play, as well as links to professional organisations that may be able to assist them.

Trickless N.V. takes the issue of underage gambling very seriously and in compliance to our licensing requirements, we will take all reasonable measures available to allow only those of the legal age (18 years +) to register a player account and wager real money.

As a socially responsible operator, we will have effective policies, procedures, and tools in place to prevent underage gambling, and these tools will be regularly tested and audited.

In line with our licensing conditions, any marketing or advertising on our platform will not be targeted at minors and will not include images of children or those who appear to be under the age of 25 years.

Any marketing material and our platform, including any terms and conditions, will make it clear that underage gambling is illegal.

Trickless N.V. will only accept business/registrations under licensing regulations. To uphold our strict adherence to gaming regulations and ensure that minors do not access our online products, an effective registration process is adopted that records information about user registrations that records name, address, and date of birth. This is then verified using an independent 3rd party KYC service provider.

Age Verification

An 18+ logo is prominently placed on the homepages of any client website that we operate and is visible during the account registration process.

Additionally, any websites associated with Trickless N.V. will contain a tick box allowing users to positively accept and confirm that they are of the legal age to enter and enjoy the website.

If any underage activity is detected and confirmed Trickless N.V. or its associated websites will refund any transactions back to the nominated payment method refunded back via the nominated payment method. Trickless N.V. will make a record of the underage user to prevent further attempts to play and report the incident to the relevant authorities.

Staying in Control

Trickless N.V. wants users to enjoy our platform and encourages the promotion of responsible gaming and staying in control. In addition to the variety of tools that are available to allow for responsible playing, we advocate the use of self-awareness questionnaires designed to assess the level of activity and lend to self-regulation.

Account Deposit Limits

Functionality can be set to allow self-imposed deposit limits during the initial account registration process before making any deposits onto a website, and at any time thereafter, to allow users to make an informed choice on their level of spend.

The period/duration of the limits on offer should:

1. 24 hours

2. 7 days
3. One month

If limits are to be set across concurrent time frames e.g., a daily deposit and a weekly threshold, the lowest limit should always apply.

Session Reminders

Trickless N.V. adheres to and understands the remote gambling and software technical standards requirement of a responsible gaming system providing a 'reality check'. This should be an easily accessible session reminder that can be set at pre-determined time slots, which will act as the aforementioned 'reality check' of the end user. The session reminder should display the amount of time elapsed since a single gaming session has commenced. The end user (customer) is required to acknowledge this check for it to be removed from the screen.

The user should be offered the opportunity to create or amend a session check easily.

The session reminder should provide the following options:

Continue playing, this can be reset and will reappear once the pre-allotted time frame draws to an end.

Exit the game, meaning the current game would be closed and reset.

Account Time Outs

Trickless N.V. offers an easily accessible 'time out' facility for end users/customers in which they can temporarily disconnect from playing or accessing their account for a pre-set period of time, which can range from 24 hours and 6 weeks.

Time-out requests should be activated with immediate effect, and members will be unable to access the site until the time-out has expired. Time-out periods cannot be overridden.

Trickless N.V. offers a time-out facility for users for the following durations:

1. 24 hours
2. One week
3. One month
4. Up to a maximum 6 weeks

Account Self-Exclusion

Self-exclusion is an industry-recognised closure program whereby a user makes an informed decision and commitment to refrain from using online gambling facilities. As a socially responsible gaming provider, Trickless N.V. is committed to ensuring that this facility is available and upheld, and this tool forms a core element of our Responsible Gaming policy.

The timeframe for opting to utilise a self-exclusion can be between 6 months to 5 years.

Once authorised, it is not possible for any closure requests to be overridden during the course of the exclusion period; any funds on a customer account must be returned at this stage.

Only after the period of self-exclusion has expired can the user request to reopen their account. At the point a user chooses to be self-excluded, further account control settings are updated on our gaming platform to ensure self-excluded individuals do not receive targeted marketing or promotional materials. Self-exclusion is an agreement whereby the customer and operator agree that the user should refrain from gambling for a set period and, by doing so, should not create any further accounts with the operator. Additionally, Trickless N.V. will employ all reasonable measures to ensure that the user has not been able to get on the site and create any new accounts. Upon expiry of the self-exclusion period, should a user wish to reopen their account, then this request should be considered by the operators' trained staff. Any such request to re-join will be subject to a 24-hour cooling-off period, in which the account will be fully examined before approval may be granted.

Trickless N.V. reserves the right to close a user's account at any time if it believes that it is in the best interests of both the customer and the operator.

General Account Closures

Accounts held on the Trickless N.V. platform may be closed by the user at any time for any reason. Any available funds that the user is entitled to will be returned to the registered active payment method following the Anti Money Laundering policy and the site's general terms and conditions.

Trickless N.V. reserves the right to temporarily suspend or permanently close a user account at any time by our general terms and conditions, and if it is found that the account has breached specific policies or events, including but not limited to the following:

1. Bonus Abuse
2. Fraud
3. Suspicious transactions
4. Collusion
5. Money Laundering
6. Use of robots
7. Underage usage
8. Breach of Self-Exclusion
9. Misuse or manipulation of any fault or error in our software

Self-Help Organisations

Trickless N.V. is committed to working within a socially responsible environment and has links to independent third parties functioning within the jurisdiction in which we operate and hold a licence.

Any website that Trickless N.V. operates will have clear links and contact details for several self-organisations on its websites where users can find further information, help, and support for gambling-related problems.

Many organisations provide services to anyone who may be concerned with their gambling or who wants support and advice. We recommend that you contact one of the following professional organisations if you feel you require any help or guidance: www.gamblersanonymous.org/ga and www.begambleaware.org

A proactive stance towards controlling play and spend should be included on all affiliated websites, including the following approved questions, depicting that gambling has become an issue rather than a pleasurable experience:

1. Spending more money and time on gambling than you can afford
2. Finding it hard to manage or stop your gambling
3. Having arguments with family or friends about money and gambling
4. Losing interest in usual activities or hobbies like going out with friends or spending time with family
5. Always thinking or talking about gambling
6. Lying about your gambling or hiding it from other people
7. Chasing losses or gambling to get out of financial trouble
8. Gambling until all of your money is gone
9. Borrowing money, selling possessions, or not paying bills in order to pay for gambling
10. Needing to gamble with larger amounts of money or for a longer time to get the same feeling of excitement or buzz
11. Neglecting work, family, personal needs, or household responsibilities because of gambling
12. Feeling anxious, worried, guilty, depressed, or irritable.

Staff Training

Trickless N.V. is committed to providing a culture of compliance amongst all staff, key stakeholders, and affiliated operators/websites.

Regular staff training on core subjects, such as Responsible gaming, is held annually, and training is incorporated into the company's induction program by a dedicated internal training manager.

The training and support program is designed as a continual process that is aimed at raising the awareness levels of responsible gaming issues and providing industry updates related to regulatory initiatives and campaigns.

All Responsible Gaming training and policy guideline documentation is incorporated within the Trickless NV company handbook.

Appendices

Appendix A: Self-Help Organisations

If you or someone you know is experiencing gambling-related problems, please contact one of the following independent organizations for confidential help and support:

- **Gamblers Anonymous** – <http://www.gamblersanonymous.org/ga>
- **BeGambleAware** – <http://www.begambleaware.org/>

Appendix B: Sample Complaint Submission Form

Field	Description/Instructions
Player Name	Enter your full name
Account Number/ID	Enter your account number or username
Contact Information	Email and/or phone number
Date of Incident	DD/MM/YYYY
Description of Issue	Provide a detailed description of your complaint
Supporting Documents	Attach any relevant files/screenshots
Preferred Resolution	Describe your desired outcome

Submission:

Submit this form via email to: compliance@trickless.io

Appendix C: Staff Training Outline

Responsible Gaming Staff Training Includes:

- Overview of Responsible Gaming principles and CGA requirements
- Identifying signs of gambling distress and vulnerable players
- Procedures for handling self-exclusion and time-out requests
- Customer interaction protocols for responsible gaming
- Complaint handling and ADR process
- Updates on regulatory changes and industry best practices
- Annual refresher and assessment