

Responsible Gaming Procedure

Play UK Internet N.V.
("the Company")

Table of Contents	2
Revision History.....	3
Definitions and Abbreviations	3
Introduction and Policy Statement	5
Responsible Gambling.....	5
Problem Gambling.....	7
Age verification.....	7
Information Visibility.....	7
Behavior tracking.....	8
Customer Interaction and Intervention	8
Cooling-off and Self- exclusion.....	8
Reactivation of customer’s account after self-exclusion.....	12
Company initiated self-exclusion.....	12
Deposit Limits	12
Reality Checks	13
Customers Protection Measures	13
Independent Organizations	13
Problem Gambling Self-Assessment.....	14
Gambling History	14
Language.....	14
Duplicate Accounts.....	14
Advertisement activities	14
Bonus conditions.....	15
Third party responsibility	15
Internal evaluation.....	15
Training.....	15
Policy Review	16

Revision History

Version #	Effective Date	Approving Official	Responsible Office	Next Review Date	Comments
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Signed by:
Annemarie Heyer
Managing Director

Definitions and Abbreviations

Advertisement activities	Marketing, promotion and advertising of all resources, messages and media of the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns. Bonuses also fall within advertisement activities.
CGA	Curacao Gaming Authority
Customer	Individual who has registered with the Company for the purpose of making use of the services offered on the Website and for which a Customer Account has been opened providing him/her with a username which can be activated using the Customer's email.
Customer Account	An account granted to an individual after registration on the Website. The Customer Account is created and issued by the Company and is required for wagering with real money. Only one Customer account is permitted per person, per IP address, per family and per Shared Environment.
Game of chance	Any game in which one or more Customers, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and Customers' insight or skill, with no possibility for Customers to significantly influence the outcome, including sports betting and poker
LOK	National ordinance on the Game of Chance ('Landsverordening op Kansspelen')
Vulnerable Persons	a. Persons under eighteen years of age(minors); b. Person that has no, or insufficient, control over his or her gambling behavior, 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; c. Person that has been banned from playing any Game of Chance either by force or at his or her own request; d. Person that has been declared bankrupt, or has otherwise lost the control or disposal of all or part of his or her property;

Introduction and Policy Statement

The Company believes in a responsible attitude towards gambling and has implemented measures detailed within this document to promote and ensure responsible gambling. The Company believes that the industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for those Customers requiring assistance.

For the majority of people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. The Company acknowledges that for some people, gambling can have a negative impact on their life and therefore the Company has developed this Responsible Gaming Procedure (hereafter: the 'Policy') which outlines certain practices adopted by us when providing services to our customers.

As part of the Company's problem gambling initiative all staff receive responsible gambling training as part of the induction process and annually thereafter.

The Company has appointed a designated Responsible Gaming person, who is responsible for implementing and enforcing the Policy. Furthermore, this designated person shall be the point of reference regarding this Policy and its related requirements.

Responsible Gambling

Responsible gambling involves the conduct of gambling in a manner where the potential for harm associated with gambling is reduced.

The Company respects the rights of our Customers to enjoy our services and to take responsibility for their own conduct but also acknowledges the duty to our customers to provide them with appropriate information that may assist them to manage their gambling. As a general principle no credit shall be offered to customers for the purpose of wagering.

The Company's aim is to ensure that customers make informed decisions about gambling and that if the customer requires assistance, to facilitate access to gambling help services.

The Company shall prominently display responsible gaming messaging across its website(s), including the homepage, registration page, and responsible gaming section. The following message will be displayed:

Gaming can be harmful if it is not controlled. Responsible Gambling | www.gambleaware.co.uk | www.gamcare.org.uk

No persons under the age of 18 are permitted to gamble (or 'play').

The Responsible Gaming Policy for Licensed Operators as issued on April 17, 2025 by the Curacao Gaming Authority (hereafter: 'RG Policy CGA') sets out various obligations which must be adhered to. As part of the RG Policy CGA, the Company will prominently display:

- The license details through the dynamic seal on the page(s);
- A sign which indicates that under-age gaming is prohibited;
- A 'responsible gaming' message, explaining that gaming can be harmful if it is not controlled, and information about the Customer support measures;
- A direct link leading to the responsible gaming section which includes all relevant responsible gaming information required by the CGA;
- A direct link which enables Customers to refer to one or more gambling support organizations;

We prioritize the protection of our Customers through the following measures:

- Age Verification: Customers must be at least 18 years old to participate in any gaming activities. Age verification is done during the account registration process.
- Self-Assessment Tools: We provide a self-assessment questionnaire to help Customers evaluate their gaming behavior and identify potential risks. The questionnaire is accessible via our website;
- Behavior Tracking: Customer behavior is monitored through operator processes and procedures to identify potential signs of problem gambling and intervene when necessary. This includes reviewing deposit patterns, frequency of play, and time spent on gaming activities.;
- Deposit Limits: Customers can set daily, weekly, or monthly deposit limits to manage their spending;

The Company may introduce additional responsible gaming tools, including loss and session limits, as part of ongoing platform development.

- Cool-off periods and Self-exclusion: Customers can self-exclude in order to take a break from gaming. Self-exclusion can be set for a minimum period of 1 day or for any longer period selected by the customer, including permanent account closure.

Problem Gambling

Problem gambling occurs when there is a lack of control over gambling, particularly the scope and frequency of gambling and the amount of recreational time spent gambling.

The negative impacts may include:

- Extreme financial losses relative to their sources of income;
- Adverse personal effect on the customer, his or her family and friends;
- Adverse effect on employers and work performance.

The Company's aim is to achieve equilibrium in the provision of gambling services, taking into account those Customers who enjoy our services and use them as a form of entertainment, the wellbeing of our Customers who have an acknowledged gambling problem, their families and the community at large.

Age verification

The Company does not allow anyone under 18 years of age to play on their website(s). Age verification is conducted in accordance with the AML guidelines of the CGA. Age verification is carried out by the system upon account registration and further verified through KYC and PEP/Sanctions screening on 1st deposit attempt.

In the unlikely event that an underage Customer does manage to play, all deposits will be returned to the customer regardless of win or loss. The account will be closed immediately.

The company will retain records of all age verification processes and their outcomes according to the Company's record keeping obligations and for regulatory review by the CGA.

Information Visibility

The Company ensures that Customers can easily access responsible gaming information by:

- **Visible Links:** Our homepage displays a link to the responsible gaming policy, tools, and contacts. These links are also included in the footer of the homepage on our website
- **Terms and Conditions:** Clear references to our terms and conditions, including the prohibition of underage gambling, are provided. The terms and conditions are easily accessible and written in plain language;

- **Responsible Gaming Organizations:** Links to organizations that offer support for gambling addiction are available. These include local and international organizations, as per this policy.

Behavior tracking

The Company monitors customer activity to identify potential gambling problems. Behavior tracking will be done, amongst other elements, on the following factors:

- Deposit and wagering frequency;
- Repeated failed transactions due to insufficient funds;
- Reversing withdrawals;
- Inexplicable extended play sessions;
- Frequent changing to Responsible Gaming tools;
- Unreasonable increased communication with customer support;
- Attempts to open multiple accounts to bypass deposits or loss limits.

In version 1.2 of the Policy this will be further detailed as per the implementation schedule of the RG Policy CGA.

Customer Interaction and Intervention

Where monitoring systems detect indicators of potential problem gambling, the Company may implement intervention measures including:

- Sending responsible gaming reminders to the Customer
- Encouraging the Customer to set deposit limits
- Temporarily restricting gaming access
- Contacting the Customer to provide responsible gaming guidance
- Suggesting the use of self-exclusion tools
- All interactions and intervention measures will be recorded internally.

Cooling-off and Self- exclusion

Cooling-off and Self-exclusion is recognized by the gambling industry as a way for players to control their gambling. The Company offers a cooling-off and self-exclusion facility to help those customers who feel that their gambling is out of control and want our assistance to help them stop.

The cooling-off and self-exclusion request shall be applicable:

- To all brands/domains operated under the Company;
- All gambling activities related to all gaming verticals available on the Company's website/s¹.
- All advertisement activities of the Company. An automatic opt-out will be triggered when self-exclusion is activated

The Company provides Customers with two responsible gambling tools: **Cooling-Off and Permanent Self-Exclusion**.

Cooling-Off

Cooling-Off is a temporary exclusion period which may be activated by the Customer directly through their account.

The Cooling-Off option may be set by the Customer for a minimum period of 1 day or for any longer duration made available by the Company through the account interface. Once activated by the Customer, the Cooling-Off period shall take effect immediately.

During the Cooling-Off period:

- a. the Customer's account shall be restricted and the Customer shall not be able to log in, wager, or otherwise participate in any gambling activity;
- b. the Cooling-Off shall apply to all gambling verticals made available by the Company on the relevant brand/domain;
- c. the Customer shall be excluded from all direct marketing and promotional communications for the duration of the Cooling-Off period; and
- d. the Company shall not question the Customer's decision, offer bonuses or promotional incentives, or delay or complicate activation of the Cooling-Off period.

¹ Gaming verticals are types of groups wagering activity available on the domain of the online casino, such as casinos (i.e. slots, table games) and sports betting (i.e. horsebetting)

Only Cooling-Off requests activated directly by the Customer through the responsible gambling functionality within the account shall take effect immediately. Requests submitted through email or other communication channels may require manual processing and may not be effective until applied by the Company.

At the end of the selected Cooling-Off period, the account may be reactivated in accordance with the Company's operational process and responsible gambling procedures.

Permanent Self-Exclusion

Self-Exclusion is a permanent exclusion measure intended for Customers who wish to stop all gambling activity with the Company on an indefinite basis.

The Permanent Self-Exclusion request shall apply to:

- a. all brands/domains operated under the Company;
- b. all gambling activities and gaming verticals available through the Company's website(s); and
- c. all direct marketing, promotional and advertising communications, with automatic opt-out taking effect immediately upon activation.

The Customer shall be able to activate Self-Exclusion through the account functionality made available by the Company. Once activated, the Permanent Self-Exclusion shall take effect immediately.

Following activation of Permanent Self-Exclusion:

- a. the Customer's account shall be closed or blocked;
- b. the Customer shall no longer be able to log in, wager, or participate in any gambling activity;
- c. no marketing or promotional communications shall be sent to the Customer;
- d. any payment method previously used by the Customer may be blocked from future use, where operationally feasible; and

e. the Company shall implement reasonable measures to prevent the Customer from opening a new account under different credentials.

The Company shall not question a Customer's decision to activate Permanent Self-Exclusion, nor offer bonuses, benefits or other inducements to continue gambling, or otherwise delay or complicate the activation process.

Where Permanent Self-Exclusion has been activated directly by the Customer through the account functionality, any wagering occurring after activation shall be voided and the relevant funds returned to the Customer, subject to applicable law and regulatory requirements.

Requests for Permanent Self-Exclusion submitted through email or other manual communication channels may require processing time before implementation. Any wagering taking place before the Permanent Self-Exclusion has been applied to the account shall remain valid, subject to applicable law.

The Company shall retain records of Cooling-Off and Permanent Self-Exclusion requests in accordance with applicable legal and regulatory record-keeping requirements.

If a self-exclusion is applied, the following actions should be in place:

- The Customer's account is closed. The Customer can no longer log in.
- The Customer must complete any tournaments that are in-running at the time of the self-exclusion.
- Ante-posts bets will be voided and refunded subject to AML/CFT regulations.² Contributions to progressive jackpots that were made by the Customer through gameplay prior to the self-exclusion request remain, but the Customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect.

²Ante post best bets are those placed in advance of the opening of betting market for that event

- No Advertisement activities shall be conducted towards the Customer.
- Any payment method used by the Customer will be blocked by the Company for future use during the term of the self-exclusion period.

The Company will implement measures to prevent self-excluded Customers from creating new Customer's accounts under different credentials.

The Company will retain records of self-excluded requests by Customers according to the applicable record keeping requirements.

Reactivation of customer's account after self-exclusion

After the self-exclusion period set by the customer ends, the Customer's account is automatically re-opened.

Company initiated self-exclusion

The Company may exclude a Customer from gaming activities as a high-risk intervention measure if:

- The Customer displays problematic (gaming) behavior
- The Customer attempts or engages in criminal activities through the Company's platform.

The Company will not exclude Customers solely on the basis of the amount of their winnings.

Deposit Limits

In line with the RG Policy CGA, the Company will offer the opportunity to set limits.

The Customer will have the possibility of setting Deposit Limits. This allows the Customer to limit the amount of money that can be deposited within a set timeframe; usually daily, weekly or monthly;

Requests to decrease limits shall take effect immediately. Requests to increase limits may be subject to a cooling-off period.

This will be further detailed in version 1.2 of this policy as per the implementation schedule of the RG Policy CGA.

Reality Checks

Customers may be provided with reality check notifications as part of ongoing system enhancements.

Where implemented, a reality check notification offers the Customer the option to exit the gambling session e.g. log out.

Further details may be implemented in future versions of this Policy in line with system development.

Customers Protection Measures

In order to prevent and combat problem gambling we provide, through our Responsible Gambling page, a number of measures to assist our Customers including:

Independent Organizations

The website of the Company will display the direct links to:

<https://gamblingtherapy.org/information/where-can-i-get-help/>

and /or

<https://www.gamcare.org.uk/self-help/links-to-other-support-agencies/international support-contacts/>

and/or

<https://www.gambleaware.org>

as well as to specific names of organizations offering treatment options in case these are available in the target market of the Company. These links will be readily available on the footer of the website.

Problem Gambling Self-Assessment

The Responsible Gaming section on the website will contain information that any Customer can assess to help them identify any potential problem gambling behavior. The Responsible Gambling page shall contain a simple checklist that anyone who thinks they have a problem gambling can work through and get an insight into whether they do have a problem, which will be further detailed in version 1.3 of this policy as per the implementation schedule of the RG Policy CGA.

Gambling History

A registered participant's gambling history is available, including all deposits and withdrawals. This information allows a Customer to monitor their gambling spend. A full statement can be found within the Customer Account or can be requested by contacting the customer support team.

Language

All problem gambling material and content is available in English language only. Procedures remain the same irrespective of language.

Duplicate Accounts

The company will take measures in order to prevent Customers from opening duplicate accounts on the Website, which measures will be further detailed in version 1.3 in accordance to the implementation schedule of the Responsible Gaming policy CGA.

Advertisement activities

The Company shall engage in responsible advertising. According to the LOK, The Company must ensure that its marketing and advertising activities, including the offering of bonuses:

- do not encourage excessive gaming.
- are not misleading, thus fee. do not portray gaming as an investment, misrepresent skills vs games of chance as mentioned in the CGA RG Policy.
- do not target Vulnerable persons.

All affiliates, marketing partners, influencers, sponsorship partners, and third-party representatives engaged by the Company must comply with the responsible gaming standards outlined in this policy.

The Company remains responsible for ensuring that promotional activities conducted on its behalf adhere to responsible advertising principles.

All advertisement done by the Company or third parties hired by the Company will include a clearly visible Responsible Gaming message or slogan.

Bonus conditions

As bonuses are regarded by the CGA as advertisement activities, they fall under responsible advertisement conditions under the LOK and the CGA RG Policy.

Therefore, the Company will communicate to the Customer the terms and conditions of any bonus and/or promotion clearly. Furthermore, the Company is committed to not use any bonus to encourage excessive gaming.

Third party responsibility

The Company shall make any contracted third-party aware of their Responsible Gaming Policy and require them to adhere to it.

The Company is accountable for materials provided to affiliates, representatives, sponsorship, ambassador's social media influences, including wordings and visuals representations, in case these influencers actions and/ or statements pertain to paid placement of advertisements.

Any Customer who is currently under a period of self-exclusion (cooling off) or a permanent exclusion due to problem gambling, will be removed from all marketing correspondence lists. No marketing or promotional materials is to be sent to excluded Customers.

Internal evaluation

The Company will periodically review its responsible gaming procedures and customer interactions to ensure effectiveness and compliance with regulatory requirements.

Training

Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to all staff. All staff are provided with induction training on responsible gambling, and annually thereafter.

To ensure best practice, ad-hoc training may also be provided to employees to discuss findings following evaluations. Further details on this topic will be implemented in version 1.3 in line with the implementation schedule of RG Policy CGA.

Responsible gaming training will be provided to employees during onboarding and periodically thereafter. Training will include identification of problematic gambling behavior, appropriate customer interaction procedures, and escalation protocols where intervention may be required.

Policy Review

This Responsible Gaming Policy shall be reviewed periodically to ensure alignment with regulatory requirements and responsible gaming best practices.

The policy shall be reviewed at least annually, or earlier where regulatory developments or operational changes require updates.