

**Responsible Gaming Policy**

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**1. Document Version Control**

| Version | Date       | Author          | Description                                                                                                                                                                                                                                                           |
|---------|------------|-----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 1.0     | 16/04/2024 | Compliance Team | Initial draft based on GCB requirements                                                                                                                                                                                                                               |
| 1.1     | 17/04/2025 | Compliance Team | Policy updated to include formal version control tracking and detailed appendices outlining Responsible Gambling tools, intervention models, external support contacts, and staff training requirements, in alignment with Curaçao Gaming Control Board expectations. |

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## **Responsible Gaming Procedure**

### **2. Introduction**

#### **2.1. Purpose**

This procedure shall ensure all customer account management actions follow regulatory requirements that Prolific Trade N.V (the “Company”) is subject to as a B2C provider of gambling services to consumers and to its affiliated companies providing similar B2C services as well as B2B products and services.

This Policy is drafted in accordance with the Responsible Gambling obligations set by the Curaçao Gaming Control Board (GCB) and forms part of Prolific Trade N.V.'s licensing commitments under its issued gaming license.

#### **2.2. Scope**

This procedure applies to all Company employees, affiliated companies and key function holders that handle customer accounts.

#### **2.3. Status of this Document**

The procedure may only be amended / considered to be in force upon the written approval of the Chief Operations Officer. The latest approved version should be stored centrally by the Human Resources Department.

### **3. Objectives**

- Prevent gambling from being a source of harm or crime.
- Ensure the protection of vulnerable players, including minors and those at risk of gambling addiction.
- Promote responsible behavior among all stakeholders.
- Support self-exclusion and offer tools to encourage self-regulation.
- Cooperate with addiction experts and relevant support organizations.

### **4. Governance and Oversight**

#### **4.1 Compliance Officer & RG Representative**

The designated Responsible Gambling (RG) Representative, overseen by the Compliance Officer, is responsible for policy implementation and day-to-day oversight.

#### **4.2 Board Responsibility**

The Board of Directors validates this policy annually. Monthly RG reports are reviewed to monitor the effectiveness of the measures and identify necessary improvements.

### **5. Player Protection Measures**

## 5.1 Age Verification

No individual under 18 is allowed to register. Age is verified electronically and manually where needed. Any underage attempt results in immediate rejection and logging.

## 5.2 Self-Exclusion Tools

Players can opt to self-exclude for a defined period or permanently. Re-registration after permanent exclusion requires a cooling-off period and managerial approval.

## 5.3 Account Limits

Players are prompted to set mandatory limits during registration:

- Deposit limits (daily/weekly/monthly)
- Session duration limits
- Loss limits
- Reality checks with pop-ups during play

## 5.4 Breaks and Time-outs

Short- and long-term breaks are available on demand. The system ensures immediate implementation of such requests.

# 6. Detection and Monitoring

## 6.1 Data Collection

We maintain full records of gameplay, deposits, withdrawals, session duration, limit changes, and exceeded thresholds.

## 6.2 Behavioural Analysis

Automated systems flag:

- Frequent deposits and withdrawals
- Cancelled withdrawals
- Extended sessions
- Doubling of deposit amounts

These accounts are reviewed by the RG team and may trigger interventions.

# 7. Interventions

## 7.1 Tiered Approach

- Automated Alerts: Pop-ups and emails
- Manual Review: RG staff interviews the player
- Escalation: Deposit blocks, enforced exclusions

## 7.2 Interview Protocols

Player interviews are logged with identity, timestamp, reason, player response, and next steps.

### 7.3 Affordability Checks

When required, source of wealth documentation may be requested to ensure safe gambling thresholds.

## 8. Vulnerable Player Groups

Additional monitoring and early interventions are implemented for:

- Young adults (18–24)
- Previously self-excluded players
- Customers showing high-risk behaviours

## 9. Third-Party Notifications

We treat external reports with discretion and sensitivity. Accounts are flagged, and assessments are conducted without breaching data privacy laws.

## 10. Procedure

Our Company strives to create a responsible, safe and sustainable gaming environment for all customers playing on its websites. We aim to provide the highest standards and ensure a fair, safe and socially responsible gaming experience which protects players from the adverse consequences of gambling in line with our licence obligations and regulatory requirements.

Our Responsible Gaming Procedure aims to protect vulnerable customers which, for the purpose of this Procedure, shall be taken to refer to any person with a predisposition to gamble excessively, whether resulting from biological, psychological, emotional or social factors, as well as to customers whose personal circumstances may put them at a greater risk of developing signs of problematic gambling, to prevent such vulnerable persons from being involved in excessive gambling, as well as to prevent and protect from fraudulent and criminal behaviour, while safeguarding customers' rights in a socially responsible manner.

From an operational point of view, the Responsible Gambling team has been tasked with ensuring the Company's compliance with its responsible gambling responsibilities by developing, maintaining and ensuring the implementation of RG policies and procedures, assisting the customer support team in dealing with problematic and/or addictive gambling behaviour and keeping abreast of all industry developments to ensure that the Company's aim to provide a safe and harmless gambling environment is attained.

The Company makes use of and provides to its customers the necessary tools allowing them to have a safe and fair experience.

In addition, the Company has implemented an automated tool, which automatically monitors player accounts in real-time when deposits and bets are placed by customers. Customers who make high deposits / several frequent deposits / high amounts of gaming time or display other problematic behaviour are monitored accordingly with notifications sent to the customer support team by the tool identifying which customers show signs of problematic gambling. The way customers are then dealt with is explained in further detail below in Sections 6 to 10. Section 11 delves further into how the automated tool monitors accounts and notifies the relevant team accordingly.

Bolstering this Procedure and confirming our commitment to ensuring a safe, socially responsible, and sustainable gambling environment is our approach to marketing – accordingly we refrain from

targeting underage persons in our marketing efforts, while enforcing the same requirement with all our third-party service providers in this regard.

In accordance with our commitment towards responsible gambling, our customer support team is trained on a bi-annual basis on responsible gambling in order for the team to keep abreast with the latest developments, trends and studies in the industry, receive training on risk assessing accounts and be better equipped to deal with problematic and/or addictive customer behaviour and patterns.

## 11. Patterns

**Gambling addiction** is described as a mental health disorder involving a compulsive need to gamble. Some surveys/stats show that problematic gamblers are prone to obtain money in illegal ways. **Addicted gamblers** usually have an inability to control their gambling impulses. They very often feel guilty or even ashamed of their behaviour and compulsion. They do not understand the negative effects of constantly losing money and they tend to believe that if they continue, one day they will recover all their losses. They also tend to have misconceptions of lost bets, as they mostly remember their wins while forgetting or downplaying their losses. This leads to highly ritualised patterns of behaviour, which are characteristic of addictions.

By way of example: when a customer enters a winning phase, during which he bets and wins, and this continues for some time. The customer at that time is very excited and bets higher amounts, waiting for higher wins to come.

Unfortunately, some customers would think that it's all about their performance and their efforts, while there are many other circumstances included when it comes to results in games, sports and casinos.

Looking at their patterns of behaviour it is noted that they tend to have a couple of wins, but overall, they will have many lost bets (Negative P&L). To recover the losses, they will start betting even more regularly.

Very often they will borrow money from friends and family without disclosing why they need the money.

Their pattern will become even more intense, and they will start blaming others for their losses (including the operator). They will attempt to recover their losses by looking for flaws or loopholes in the applicable terms and conditions to threaten the operator and/or claiming their money back through a legal dispute (ADR).

**Attribution** – Problem gamblers may believe their winnings occur as a result of their efforts and not on the basis of other random factors or factors over which they have no control.

**Magical thinking** – Problem gamblers may believe that thinking or hoping in a certain way will bring about a win or that random outcomes can be predicted. They may also believe they are special in some way and that their special attributes will be rewarded with a win.

**Selective recall** – Problem gamblers tend to remember their wins and forget or gloss over their losses.

**Near-miss beliefs** – Problem gamblers reduce the number of losing experiences in their minds by thinking they “almost” won. This justifies further attempts to win. Near-misses can be as stimulating, or even more stimulating, than actual wins.

**Chasing losses** – Problem gamblers believe that they have not really lost money to gambling, but that it can be “won back” by further gambling.

**People don’t become gambling addicts overnight; they usually follow a pattern that includes a winning phase followed by losses & chasing phases. This is then followed by a desperation phase.**

#### *Winning phase*

- ▶ Experiencing a “big win” or a series of smaller wins will keep the customer excited and entertained.
- ▶ At the same time, they can't maintain the excitement unless they are involved in high risk bets.
- ▶ The bets increase, and ultimately, the increased risk puts them in a situation where they can't afford to lose.
- ▶ Inevitably however they will start making losses.

#### *Losing and chasing phase*

- ▶ Will spend more time gambling alone and when not gambling, will spend time thinking about when they will be able to gamble next.
- ▶ Might experience a few wins but the P&L is negative.
- ▶ As the losing continues, they will start lying to their family and friends and through desperation, could resort to borrowing money that cannot be paid back.
- ▶ This will result in an attempt to “chase their losses” or trying to win back what has been lost.
- ▶ This can result in a denial of the accumulation of the financial pressures resulting from their gambling habit, ultimately affecting their personal and professional lives.

#### *Desperation phase*

- ▶ Problematic gamblers will now bet more often and take more risks, in a desperate attempt to catch up and “get even”.
- ▶ The behaviour is now out of control.
- ▶ Other addictions, psychological and/or emotional problems may also intensify during this phase and drag them down.
- ▶ Reliance on alcohol or other substances might increase to “forget” about their problems, in turn making things worse.
- ▶ Left untreated, they will ultimately enter a “hopeless phase” that usually results in clinical depression, suicide, or criminal actions that often land them in jail.

## **12. Our Obligations**

- ▶ While every individual is responsible for their own actions, we do have obligation to our customers to ensure that all gambling that takes place on our website is only for

entertainment purposes and that we do our utmost to ensure that our customers can enjoy our products and services in a socially responsible, safe and sustainable manner.

- ▶ Company employees should be equipped and knowledgeable in recognising signs of problematic gambling, addiction and underage gambling. Once noticed we must take the appropriate actions.
- ▶ We must refuse any addicted, problematic or underage clients regardless of the profit they may generate for the company, as well as ensuring that the necessary restrictions and/or blocks are put in place to restrict or permanently block access to registration and play to such people on our website.
- ▶ We will not attempt to induce a customer to continue playing when such player has shown the intention to stop the gaming session.
- ▶ We will not attempt to induce a player who has requested self-exclusion to continue making use of our gaming activities.
- ▶ We will refrain from sending marketing communications to self-excluded players.

### **13. What to look for when suspicious of Gambling problems account?**

- ▶ Does the customer have an old - registered account which is closed for addiction, or self-exclusion (permanently or temporarily) or a duplicate account? We have a no tolerance policy with regards to duplicate accounts.
- ▶ Is he continuously asking for bonuses and other freebies? While not every customer who asks for bonuses has a gambling problem, the tone (such as an aggressive or threatening tone) with which such requests are made coupled with the frequency of the requests may be an indicative factor.
- ▶ What amounts is the customer betting? Do you notice increasing betting and deposit patterns? Is he increasing the amount of his bets after a lost bet?
- ▶ Has the player increased the number of hours he spends betting per day? Is he present for most of the day or playing during unsociable hours, such as at night mostly, when the family sleeps and just a few hours during the day – from 1.00am until 7.00 am and then again during the same day?
- ▶ An attempt to use third party payment methods, such as a credit card owned by family member, a third party's bank account or e-wallet account. We have a no tolerance policy with regards to third party payment methods.
- ▶ Frequently cancelling requested withdrawals and wagering the money again.
- ▶ Setting and changing the limits set on the account constantly, which may indicate the loss of control over the person's spending and gambling habit.
- ▶ Using abusive language on chat or email, insistently asking for money back and generally displaying signs of agitation, distress, intimidation, aggression, or extensive frustration after losses.
- ▶ Constant changes in deposit patterns, such as when a customer deposits a large amount on one day and a small amount on another day.

### **14. Types of account blocking**

**Self-exclusion:** This can be activated both from our end as well as from the player's end. It is a regulatory requirement to have this facility readily available to players and we aim to encourage players whom we deem to require this type of block to self-impose it, as self-exclusion indicates an admission of the problem by the player. If a player asks us to close his account permanently and mentions responsible gaming / addiction, we self-exclude for an indefinite period.

**Increasing Self-Exclusion Period:** This can be activated both internally and by the player. It is a regulatory requirement to have this facility readily available to players. Players are informed of the option to increase their self-exclusion period by contacting our support team. This information is provided in our terms and conditions, responsible gaming profile tab and whenever a self-excluded player tries to log into their account. If a player asks us to increase the period of self-exclusion, this shall be applied immediately.

**Decreasing Self-Exclusion Period:** Any such request is honoured upon receipt of a notice from the customer only. A 24-hour cooling off period applies.

**Revoking indefinite Self-Exclusion:** Any such request is honoured upon receipt of a notice from the customer only. A 7-day cooling off period applies.

**Permanent closure:** Any such request can be activated both internally as well as from the player. It is also activated by the company in the case of fraudulent activity (such as in the case of chargebacks or using stolen cards, for instance) and duplicate account activity.

**Lifting Permanent Closure:** This can be activated internally only and requires approval of the Head of Payments and Fraud. A 7-day cooling off period applies.

## 15. Limits

In order to assist our players in gambling responsibly, we have a limit option within each customer account. This option can be accessed through the Responsible Gaming section of the website or on the Responsible Gaming tab of the individual profile page.

These limits allow customers to set the maximum amount of money they will be able to deposit (Deposit limit), wager (Wagering limit), or lose (Losses limit), and set the maximum time of their gaming session (Session limit). Customers will be able to choose the time period for which each of the above limits will be applied.

Limits can be amended at any time by the customers. A decrease (i.e. setting more stringent limit) in the Deposit limit, wagering limit, Losses limit and Session limit will take effect immediately, but an increase (i.e. setting less stringent limit) can only occur after a twenty-four (24) hours cooling-off period during which the previous limit shall remain in force, in order to avoid rash decisions.

Limits may be removed or decreased by the Company exclusively upon receipt of a notice from the customer.

## 16. Account Closure Procedure

If a customer contacts support and asks for the account to be closed the following steps must be followed:

1. Verify the account by asking the security questions (full name, address, latest deposit method, latest game activity).
2. Ask for the reason.
3. Educate the customer about the difference between account closure and self-exclusion.
4. If the customer states gambling addiction/financial problems/loss of control, then treat the request as a Self-Exclusion for an indefinite period and apply that procedure accordingly.
5. If the customer mentions he/she wants the account closed for reasons not related to responsible gaming or addiction, then leave a message (comment) on the account in the back-office stating that the customer wishes to block the account, the reason (e.g. doesn't like our promos) along with ticket Id number and escalate to the Head of Customer Support for account closure.
6. **Always check if there is any balance on the account.** If the player has funds, these should be returned - reverse funds to the most commonly used deposit method or to their bank account (bank account must be verified prior to releasing the funds) in accordance with the T&Cs.
7. **After permanently closing an account there is no option to unlock it.** Therefore, the player will not be allowed to register again.

Any account holder having pending withdrawals due to suspicion of Money Laundering should not be contacted from our side unless de-escalated from MLRO. We should restrict the information flow to those customers. Please refer to AML/CDD procedure.

## 17. Self-Exclusion procedure

Any customer requesting a self-exclusion either in writing and/or verbally must be considered directly as a problem gambler (gambling addiction declaration).

Therefore a customer does not need to specify upon request that he/she suffers of gambling addiction or financial issues, as self-exclusion is the result of taking a break away from gambling due to addiction and/or financial issues and/or loss of control.

1. If authenticity of the account owner cannot be established, we will verify the account by asking the security questions (full name, address, latest deposit method, latest game activity).
2. If the request is sent through email or the contact form on the website and no period of exclusion is given, we will self-exclude for 6 months by default and contact the customer through email/phone to verify the account and provide further responsible gaming education. A longer period of exclusion will be applied if requested by the customer. If the customer requests shorter period, this request should be sent by email, and the 24-hours cooling off period shall apply.
3. The player will be asked for how long the exclusion should be set.
4. If no time is given, we will impose a self-exclusion for 6 months by default, while if the time limit is given as “forever” or similar, we will apply an indefinite self-exclusion.
5. We will activate the self-exclusion on the account for the requested period.
6. We will inform the customer that they have self-excluded the account for the given period.
7. We will leave a note on the customer’s account accordingly.

Any self-exclusion requests should be handled right away, across all brands/websites operated by the Company, and the support agent should also check if the customer has any duplicate accounts, including on other brands.

If any duplicate accounts are found they should be permanently blocked on the spot while ensuring that no outstanding funds are available on the account(s). If any outstanding funds are found on any of the accounts, the funds will be reversed to the most commonly used deposit method or to a bank account (bank account must be verified prior to releasing the funds).

Non-registered users of our website are presented with the right to request us to exclude them from future gaming activity by contacting support. Such requests should be handled by first requesting such users to present us with identification information (email, full name, address, date of birth), manually creating an account for such user and immediately excluding this account from play for an indefinite period. This self-exclusion may be revoked only if we receive a request from the user in writing/electronic format asking us to do so. A 7-day cooling off period applies.

## **18. Self-exclusion lifting procedure**

**Self-exclusion shall be lifted (revoked, decreased) only upon receipt of a notice from the customer and the cooling off periods described in section 6 shall apply.**

Prior to applying the cooling off period, the following questions must be answered via chat or email:

- ▶ Do you or have you in the past suffered from gambling addiction?
- ▶ Do you have any financial issues?
- ▶ Do you take full responsibility for the reopening of your account?
- ▶ What was the reason you closed your account in the first place?

We will not lift the self-exclusion if the answers given indicate that customer suffers from addiction or is not in control. The customer will be informed of the outcome and a note will be left on the customer's account.

## **19. Automated tool notifications**

Apart from having customers contact us with regards to problematic gambling issues, we also use an automated tool which monitors player activity accordingly. Fields and factors such as a customer's total deposits and withdrawals, winnings and losses, session times and session lengths are taken into consideration in order to check if a customer is showing signs of potential problematic gambling, therefore giving us a chance to be pre-emptive and attempt to deter the customer from becoming a problematic gambler.

Customers showing small to medium signs of problematic gambling will have their deposit and betting functions disabled and will be contacted via email informing them of our responsible gaming efforts, suggesting self-help websites as well as explaining Self-Exclusion options available to the customer. The deposit and betting functions will only be enabled again if the

customer gives us their go-ahead to proceed, with the customer's account flagged for further monitoring.

Customers showing heavy signs of problematic gambling will have their account closed with any balance refunded to the most commonly used payment method used by the customer or via bank transfer. The account will be closed as per steps mentioned above in section 8 (Account Closure Procedure).

## **20. Complaint handling procedure**

If a player has a difference of opinion with a gambling operator, we must follow the procedure detailed below.

Examples of arguments or disputes include, without limitation:

- ▶ The way that their payments were managed
- ▶ Terms and Conditions
- ▶ Bonus offers
- ▶ CDD
- ▶ Account closure
- ▶ Commercial decisions taken by the operator
- ▶ IT issues
- ▶ Customer service

Members of the customer support team must familiarise themselves and act in accordance with the "Complaints and ADR Policy" document.

Should a complaint be received from a customer, the following procedure will be followed:

- ▶ Verify the account by asking the security questions (full name, address, latest deposit method used, latest game activity).
- ▶ Request all the information about player's complaint, player must provide any evidence they may have. We must keep a full record of the complaint within the ticketing and back-office systems.
- ▶ Leave note on customer's account accordingly.
- ▶ Let customer know that we will investigate this matter further and we will get back to him/her within 10 business days.
- ▶ Escalate this matter to Customer Support for investigation and possible further escalation.
- ▶ Once the investigation is closed and Customer Support has come up with an outcome after having escalated the matter to the Compliance Officer, where necessary, revert back to customer with the outcome as per the email template below.
- ▶ If player is not satisfied with the outcome of the operator's investigation, they may refer the dispute to the appointed Alternative Dispute Resolution entity - known as an ADR (an independent third party).
- ▶ If asked, inform customer that a Referral to an ADR is free of charge for customers, although they may be asked to provide information (such as copies of relevant documents) at their own costs.

- ▶ Once the complaint is filed with the ADR, ask customer, if applicable, to refrain from contacting us for an update. The ADR may contact the player in the course of their investigation and will tell him/her their decision at the end.

## **21. Protection of Minors & Vulnerable People**

Never offer credit or loan services to players, we do not provide these.

We require players to affirm that they are of legal age before they register with us. This is done both by asserting this in the general terms and conditions available on the website, as well as by asking for the customer's date of birth during the registration process. The only way underage player can manage to create an account is by providing invalid birthday credentials.

If during verification an underage player is detected or otherwise suspicion arises that a particular player is not of a legal age, the following procedure is to be followed:

- ▶ Request CDD documents as per Fraud Control, Know Your Client (KYC), Anti-Money Laundering (AML) & Pay-out Management Procedures" document.
- ▶ Request a selfie with the ID document.
- ▶ If player is not of legal age – block account immediately, perform search for duplicate accounts and block those immediately upon detection. Future registrations will be therefore blocked.
- ▶ Escalate to the Customer Support team lead.
- ▶ Confiscate all winnings, refund and return all deposits.