

(Curaçao) RESPONSIBLE

GAMING POLICY v1.0

Version Control

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Review	

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2. Purpose

The purpose of this Responsible Gaming Policy is to set out the principles of Adda Entertainment N.V. ("The Company") to ensure the requirements of social responsibility are met. The Company has adopted the Responsible Gaming Policy to set the responsibilities of The Company to ensure that all staff are aware of and understand the legal and regulatory responsibilities towards The Company's customers, and to ensure The Company's employees and staff is adhering to a high level of knowledge base while practicing the principles set out in this document.

3. Policy Statement

The Company is committed to providing safe and responsible means and tools to its customers when accessing The Company products and services. The Company's aim is to ensure that Customers using its products and services have access to the required controls which enables The Company's customers to make informed decisions about gambling. The Company is also committed to recognise, and further educate its employees to recognise, any and all possible indications of Problem Gambling, and take appropriate steps upon the identification in order to protect its customers.

4. Scope

The policy applies to all employees and sets out procedures for recognition and correct actioning of the signs and suspicion of Problem Gambling and Gambling addiction, with the aim to prevent a potential harm originating from gambling activity where the Problem Gambling identifiers would apply.

This policy is also a commitment of The Company to ensure the high level of the knowledge base within the areas of Responsible Gambling and Social Responsibility. The policy defines procedures that will assist the staff of The Company to comply with its legal obligations and to

make the 'right' decision and action upon the ability to recognise the alarming signs of Problem Gambling.

5. Review and Changes

This policy is reviewed annually or after any significant events, by the Compliance Officer (CO) and approved by the Board of The Company.

6. Responsible Gaming

The Company commits to protect the vulnerable and underage individuals from gambling related harm while safeguarding our brands in accordance with its regulatory requirements. Ensuring that The Company customers' well-being remains top priority.

The Company believes that by cultivating a Compliance Culture of responsible gaming, empowering individuals to make informed decisions and providing support for those who may need it, The Company can contribute to a safer, regulated and healthier gambling environment for all.

Tools for Responsible Gaming:

Player Self-Assessment

We encourage players to regularly assess their gaming habits to determine whether their gambling remains within healthy limits. The following self-assessment tool shall allow the players to answer a series of questions designed to help identify potential problem gambling behaviours:

Gamblers Anonymous – a 20 question quiz that is published on its website.
<https://gamblersanonymous.org/20-questions/>

Cooling-Off Period

Customers can voluntarily take a break from gambling by requesting a temporary suspension of their accounts for 24 hours by contacting customer support via email 24 hours a day 7 days a week. Alternatively, if deemed necessary or beneficial, The Company will implement a 24-hour cooling-off period without customer request. Once a 24-hour cooling-off period has been applied and confirmed with the customer via chat or email, it will not be removed, decreased or reverted.

The player shall be made aware of the difference between Cooling Off period and Self-Exclusion and shall be offered the opportunity to proceed directly to Self-Exclusion if they so choose.

Self-Exclusion

To initiate self-exclusion, players can utilize the services provided by Curaçao eGaming (CEG) or the Curaçao Gaming Control Board (GCB). These organizations offer mechanisms for individuals to voluntarily exclude themselves from gambling activities, aiming to promote responsible gaming and prevent gambling-related harm. curacao-egaming.com+2gamingcontrolcuracao.org+2casino.guru+2

Curaçao eGaming (CEG):

CEG provides a self-exclusion option for players affiliated with operators licensed under its jurisdiction. To request self-exclusion, players can access the "Public and Players" section on the CEG website, where they will find a dedicated form for self-exclusion. This form allows players to exclude themselves from specific gambling platforms licensed by CEG. curacao-egaming.com

Curaçao Gaming Control Board (GCB):

The GCB oversees land-based casinos and online gaming operators in Curaçao. Players seeking self-exclusion can contact the GCB directly to initiate the process. The GCB collaborates with Fundashon pa Maneho di Adikshon (FMA), a local organization specializing in addiction management, to provide support and counseling services for individuals affected by gambling addiction. gamingcontrolcuracao.org+1theguardian.com+1gamingcontrolcuracao.org+2gamingcontrolcuracao.org+2

Contact Information:

- **Fundashon pa Maneho di Adikshon (FMA):**
 - Address: Oosterbeekstraat 11, Shèr Asil
 - Telephone: 461-5977 / 670-5544
 - Email: info@fma-curacao.com
 - Website: www.fma-curacao.comgamingcontrolcuracao.org+1gamingcontrolcuracao.org+1

Alternatively, if deemed necessary or beneficial The Company will implement a self-exclusion without a customer request.

Once a self-exclusion has been applied and confirmed with the customer, the self-exclusion can not be removed, decreased or reverted. A permanent self-exclusion will never be reverted.

Education and Awareness

Adda Entertainment N.V. is committed to responsible gambling and customer well-being. We provide access to resources, tools, and support services designed to help customers stay in control of their gambling behaviors.

Responsible Gambling Information

A dedicated Responsible Gambling Information Page is accessible on the platform:

- Registered users may access this page via:

- The footer of every website page.
- The Help Centre.
- Unregistered or logged-out users may access the same page via a permanent footer link available site-wide.

This page contains detailed guidance, risk warnings, control tools (including self-exclusion), and direct access to external support organisations.

Website Footer Disclosures

To ensure transparency, the following information is clearly displayed in the footer of every page:

- Underage gambling warning symbol.
- The Company name and registered address.
- Official Curaçao Gambling Authority (CGA) licence number.
- Confirmation of CGA regulatory oversight.
- Link to our Responsible Gambling Policy.
- CGA digital seal verifying licensing status.

Player Conduct and Safer Gambling Statement

The Company encourages all customers to gamble safely and sensibly. Gambling should be a form of entertainment, not a source of income or stress.

We recommend:

- Only betting with funds allocated for entertainment.
- Avoiding any attempt to recover losses by gambling further.
- Ensuring gambling does not interfere with social, family, or professional responsibilities.
- Never gambling with money required for essential needs or financial obligations.

We actively discourage harmful gambling patterns and provide tools to help customers stay in control.

Self-Exclusion

The Company offers a formal Self-Exclusion Program for customers who wish to voluntarily suspend their gambling activity.

Initiating Self-Exclusion:

Customers can request self-exclusion:

- Directly via the Responsible Gambling Information Page on our platform.
- Through an approved Curaçao regulator or support organisation:

Curaçao eGaming (CEG):

- Website: www.curacao-egaming.com
- CEG offers a jurisdiction-wide self-exclusion tool under its “Public and Players” section. Players can

submit a form to exclude themselves from operators licensed by CEG.

Curaçao Gaming Control Board (GCB):

- Website: www.gamingcontrolcuracao.org
- Oversees both land-based and online operators.
- Players may contact the GCB directly to initiate a self-exclusion request.
- The GCB works in partnership with Fundashon pa Maneho di Adikshon (FMA), an addiction support and counseling organisation.

FMA Contact Details:

- Address: Oosterbeekstraat 11, Shèr Asil, Curaçao
- Telephone: +5999 461-5977 / +5999 670-5544
- Email: info@fma-curacao.com
- Website: www.fma-curacao.com

Mandatory and Operator-Imposed Exclusion:

The Company reserves the right to implement a self-exclusion on a customer's behalf where there is evidence of harm or where it is deemed necessary. Such action is taken in the interest of customer safety and responsible gaming principles.

Terms of Self-Exclusion:

- Self-exclusion requests are handled confidentially and take effect upon confirmation.
- Once a self-exclusion is applied, it cannot be reduced, reversed, or removed under any circumstance.
- Permanent self-exclusion is irrevocable.

Support During Self-Exclusion:

All customers entering a self-exclusion program are provided with links to recognised and accredited support organisations:

- [GamCare](#)
- [Keep It Fun](#)
- [Gambling Therapy](#)

7. Problem Gambling

Understanding Problem Gambling

Problem gambling arises when an individual loses control over their gambling behaviour, leading to negative consequences across their personal, financial, and social life. It compromises well-being, disrupts relationships, and impairs work or recreational commitments.

Common indicators of gambling-related harm include:

- Spending more time or money than intended.
- Attempting to chase losses.
- Using gambling as an emotional escape from stress, anxiety, or personal issues.
- Prioritising gambling over responsibilities at work, home, or in relationships.

Adda Entertainment N.V. recognizes these signs and uses proactive engagement strategies, AI-powered tools, and trained customer support interactions to help identify and assist customers at risk.

Responsible Interaction Framework

Proto Chatbot (AI-Supported Pre-Agent System)

All non-VIP customers are first routed through the Proto Responsible Gambling AI chatbot, which assists with general queries and identifies potential harm indicators using machine learning.

- Customers requesting account closure are asked to specify a reason.
- Responsible gambling concerns are directed to specialist email channels for appropriate escalation.
- Severe or concerning comments (e.g., references to addiction, financial harm, or emotional distress) are immediately escalated to a trained customer support agent.
- The AI chatbot references authoritative content (e.g., Responsible Gambling Policy and Self-Exclusion Terms) and adapts its responses based on evolving behaviour patterns.

Customer Support-Led Interaction

All customer support agents undergo structured Responsible Gambling (RG) training, including quarterly assessments to refresh knowledge and ensure up-to-date understanding of risk triggers.

Agents are trained to:

- Identify early-warning signs of gambling-related harm.
- Conduct appropriate Responsible Gambling interactions, encouraging safer play or breaks from gambling.
- Share information on cooling-off periods, self-exclusion, and reputable external support services.
- Appropriately escalate cases to the Responsible Gambling Team when concerns intensify.

Voluntary Cooling-Off Period

Customers can request a 24-hour account suspension at any time via Customer Support (available 24/7). Once initiated:

- The account and all associated accounts across the 3 brands are suspended immediately.
- Customers are logged out of all active gaming sessions.
- At the conclusion of the 24-hour period, customers receive communication explaining:
 - The available self-exclusion timeframes.
 - Options to extend the break or request account reactivation.

Important: If a customer mentions addiction, loss of control, or shows signs of severe risk, reactivation after the cooling-off period is not offered. The case is escalated for a Responsible Gambling assessment.

Self-Exclusion Completion and Account Review

Upon expiry of a self-exclusion:

- Customer Support is alerted via timestamped account tags.

- Self-exclusion does not automatically lift, it requires manual review and approval.
- Based on case history, the customer may:
 - Be informed their account has been reactivated, or;
 - Receive a message (while the account remains closed) asking whether they wish to extend or reactivate.

If no reply is received within 24 hours, a follow-up email is sent. If no response follows within another 24 hours, the account is reactivated with appropriate documentation logged.

Non-Voluntary Self-Exclusion

Where customers exhibit:

- Repeated concerning behaviours,
- Mention gambling-related distress or addiction, or
- Request help without specifically asking for exclusion,

The Company may impose a **24-hour non-voluntary cooling-off period** across all accounts immediately. This is:

- Communicated in real time (if via live chat),
- Followed up and confirmed by email.

Further actions (e.g., permanent exclusion, extended suspension) are determined on a case-by-case basis by the Responsible Gambling Team.

Self-Exclusion Combined with Data Deletion

When customers request both **self-exclusion and data deletion**, The Company treats this as a **permanent self-exclusion** across all accounts.

- A confirmatory communication is sent stating:
 - Self-exclusion is in effect.
 - Personal data will be deleted and retained in accordance with internal policy and applicable legislation.
- Where not legally required, and or based on the legal, contractual or legitimate interests of the Company, data deletion is completed within 72 hours by the Customer Experience Team.

8. Player Protection Measures

Self-Exclusion Breaches

By using the same fraud fingerprint technology, The Company detects any new account registration attempts of customers under an active self-exclusion. Once detected, an automated immediate block is placed on the new account for the duration of the active self-exclusion. If a permanent self-exclusion is in place, the newly registered account will remain closed forever. Customer support agents are alerted by an internal prompt and confirm the actions taken with the

newly registered customer via email.

Transaction Data

Customers have full access to their lifetime bet, deposit and withdrawal transactional history. This data is time, and date stamped and can be found on site, within the deposit page of their account, enabling the customer to review their spending at their own leisure. Alternatively, this information can be supplied via email, if desired, by customer support agents upon email request, in PDF format. In addition, more detailed specific game round activity transaction reports are available upon request in PDF format.

Behavioural Monitoring

To assist VIP manager led responsible gambling interactions, 3rd party tools are implemented, to generate internal alerts which notify VIP managers when their customers review responsible gambling specific pages, information, or terms and conditions, on the site. This prompts a review of the customers, wagering, communications and responsible gambling history. Followed by an informative interaction or self-exclusion implementation if desired or required.

Our 24 - hours 7 days a week customer service agents are trained to understand and identify potential problem gambling triggers; furthermore when and how to take action, be it requested by the customer or deemed necessary for the customers' wellbeing.

All customers who have partaken in the self-exclusion program, or have required or instigated a responsible gambling interaction, have an internal responsible gambling file listing their responsible gambling history in chronological order.

Underage

Upon registration, customers are required to supply their date of birth, an underage date is not available or accepted. In addition, customers are required to confirm, via a tick box, that they are over 18 years of age and have reviewed and agreed with the terms and conditions.

The following advice is also available across the Company's website:

If you wish to gamble with us, you must be over 18 years of age or the legal minimum age for gambling in the jurisdiction you remain under the laws applicable to you, if younger.

We recommend if you have any minors living in your household, to review the following parental control software links, which could prove a useful tool, regarding control and restrictions of the content accessible on your devices.

<https://www.netnanny.com/>

Underage cases are detected by multiple triggers:

- Fraud and payment withdrawal triggers are met, that require KYC documentation which confirms the customer is underage.
- KYC submission – independently supplied by the customer or requested by Fraud which highlights inconsistencies or confirms the customer is underage once submitted. These scenarios create an internal alert for customer support, in an underage dedicated channel. The Fraud Team reviews the documents and informs customer support of confirmed underage cases in an underage dedicated internal channel.
- Internal department disclosure, for example The Social Media Team or Affiliate Team alert the customer support agents of customer statements via external platforms, or 3rd parties raising concerns via external platforms.
- User lead – Customers informing us that they are underage.
- Parent/guardian/3rd party claim that their child/or a minor has created an account.
- A parent informs us that a minor has accessed their account.
- Non depositor/no activity customers confirming they are underage.
- Customers asking to change the D.O.B they supplied at registration.
- Customers raise suspicions via comments in chat/email for example, 'can I use my mums account,' 'I've lost my school funds/money' etc

Once underage suspicion is raised, customer support immediately, manually closes all associated accounts as determined by the same fraud fingerprint technology as used with self-exclusions. Upon account block implementation, the customer will be logged out of all game sessions, marketing and promotional materials are frozen, and they will no longer be able to access their

accounts.

Alternatively, if detected and confirmed that the customer is underage by the Fraud Team, they will manually close all affected accounts and inform customer support, who in both situations, will communicate via email to the customer the actions that have been taken. All further email communications will be directed to the parent or legal guardian.

9. Limits

Adda Entertainment N.V. empowers players to manage their gambling activity responsibly through configurable deposit limits. These limits can be set according to the player's personal preferences and financial habits, and are available across the following timeframes:

- Daily
- Weekly
- Monthly

Once a limit is reached within the selected period, no further deposits can be made until the timeframe resets.

Adjusting Deposit Limits

- **Decreasing Limits:** Players can reduce their deposit limits at any time. These changes take immediate effect.
- **Increasing Limits:** To promote considered decision-making, any request to raise a deposit limit is subject to a mandatory seven-day waiting period before implementation.

This structure ensures that changes to deposit limits are made with intention and oversight, reducing the risk of impulsive financial decisions.

Reality Checks

To further support player awareness and promote time-conscious play, The Company offers Reality Check tools that help players monitor the duration of their gaming sessions.

Standard Session Timer

- A real-time session timer is visibly displayed on the screen whenever a player is logged in.
- This continuously updates to show the total time spent in the current session.

Customisable Reality Check Alerts

Players may enable tailored reality check notifications, set to activate at predefined time intervals (e.g., every 30, 60, or 90 minutes). These alerts:

- Pause gameplay upon activation.
- Display a message summarising the session duration.
- Require players to acknowledge the message before continuing.
- Offer an option to either end the session or continue playing.

By interrupting continuous play and encouraging reflection, these tools are designed to foster self-awareness and support healthier gambling habits.

11. Advertising and Marketing

After registering an account, customers can opt out of receiving marketing and promotion materials by navigating the 'preferences' section of their profile on the site. Alternatively, customers can request to opt out of marketing and promotion materials by contacting customer support, available 24 hours a day 7 days a week, at any time in their account life cycle.

For customers entering the self-exclusion program, accounts are immediately logged out of game play sessions, account access is blocked and the sending of all marketing and promotional materials are frozen for the duration of the time frame selected.

12. Legislation

The Company is incorporated and licensed in the jurisdiction of Curaçao with the regulatory body being The Curaçao Gaming Control Board (GCB). Therefore, it is imperative to ensure that effective risk assessments, policies, procedures, and controls are in place to prevent the events of unidentified Problem Gambling occurrence while using The Company's services, and continue to raise standards in that regard.

The following pieces of Legislation place obligations on The Company and its employees with respect to Responsible Gambling:

- AML/CFT/PF Regulations
- National Ordinance of the 20th of December 2024 Containing Rules concerning Games of Chance (National Ordinance on Games of Chance - LOK)
- Responsible Gaming Policy for Licensed Operators

13. Training

At Adda Entertainment N.V. , all employees are trained to uphold the highest standards of responsible gambling and customer protection. Our training framework is designed to ensure that every team member, regardless of role, understands their obligations, recognizes key risk indicators, and knows how to act appropriately when customer well-being may be at risk.

Training Objectives

The Responsible Gambling Training Program aims to:

- Define responsible gambling and its significance for both players and the business.
- Identify behavioural, emotional, and financial signs of problem gambling.
- Equip staff with communication techniques for delivering responsible gambling messages via chat, email, and automated tools.
- Provide a clear understanding of responsible gambling tools and features, including deposit limits, self-exclusion, and reality checks.
- Ensure consistent and accurate application of all responsible gambling processes in line with company policy.

Induction Training – All Staff

All new employees, across all departments, complete a mandatory "Yolo Take-Off" induction program within their first month of employment. This two-day, in-person session introduces the Company, its values, and includes a Responsible Gambling Module featuring:

- A video walkthrough of problem gambling stages and warning signs.
- Key triggers and at-risk behaviours.
- Company commitments to responsible gambling.
- A high-level overview of the self-exclusion program.

Specialist Training – Customer-Facing Teams

All customer-facing employees (including Customer Support Agents and VIP Managers) undergo dedicated training within their first month. This training is facilitated face-to-face by the Responsible Gambling Team or remotely, depending on employee location.

Topics covered include:

- A step-by-step guide to the self-exclusion process.
- Voluntary and non-voluntary exclusion protocols.
- When and how to initiate a responsible gambling interaction.
- Customer safeguarding and escalation procedures.

Ongoing Training and Testing

To maintain competency, all customer-facing employees must complete a quarterly responsible gambling refresher test. These assessments:

- Use a combination of multiple-choice, manual input, and true/false questions.
- Include real-life case studies and scenarios.
- Assess knowledge of any process changes and reinforce correct customer engagement protocols.

Monitoring and Process Adherence

The Responsible Gambling Team conducts daily retrospective process reviews to ensure frontline staff consistently apply procedures correctly. Any discrepancies or process failures are documented, and a personalised report is provided to the individual to reinforce correct practices.

Escalation Procedure

Any observed or reported customer behaviour indicative of gambling harm, such as signs of distress, loss of control, or repeated risky behaviour, must be escalated to the designated Responsible Gambling Officer / Dept or Compliance Officer.

Each case is assessed individually to determine whether further actions are required, which may include:

- Enhanced monitoring
- Temporary or permanent self-exclusion
- Account restrictions
- Referral to external support services

This ensures that all interventions are proportionate, consistent, and aligned with our duty of care obligations.