

**PLAYER SELF-LIMITATION AND SELF-EXCLUSION POLICY
(RESPONSIBLE GAMING POLICY)**

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I. Scope

Brightstar N.V. is committed to ensuring a safe, fair, and responsible gaming environment for all users. As part of our social responsibility, this policy outlines the measures implemented to promote responsible gaming, prevent gambling-related harm, and ensure that gaming remains an enjoyable form of entertainment.

Our aim is to provide guidance and resources to help identify problematic gaming behavior and encourage responsible play. This policy also details the tools and support mechanisms available to mitigate the risk of gambling-related harm, as well as the procedures in place to prevent access to gaming services by minors or vulnerable individuals.

II. Commitment to Responsible Gaming

Brightstar N.V. recognizes that while gaming can be an enjoyable leisure activity, it has the potential to develop into problematic behavior for some individuals. To mitigate this risk, the company has implemented procedures designed to promote responsible gaming. These include:

- Regular verification checks to ensure that no underage individuals can access gaming services.
- A range of customizable tools that allow users to set personal limits on their gaming activity.
- Access to external support services for individuals who may develop problematic gaming behavior.

Our staff members are trained to recognize signs of compulsive or problematic gambling and will offer appropriate assistance where necessary. The company adheres to all applicable regulations and industry best practices to ensure that responsible gaming is promoted at every stage of the player experience.

This policy has been developed in alignment with the Curaçao Gaming Authority's (CGA) final Responsible Gaming Policy, dated 17 April 2025. Brightstar N.V. is committed to implementing all applicable requirements within the timelines specified by the CGA implementation schedule, with rollout dates ranging from April 2025 to September 2026.

III. Prevention of Underage Gaming

To prevent access to our gaming services by individuals below the legal age, Brightstar N.V. conducts age verification checks on each player.

We strongly recommend that parents and guardians install website filtering software on devices accessible to minors to prevent underage access to gaming sites. Brightstar N.V. is committed to ensuring that only legally eligible individuals can participate in gaming activities.

If Brightstar N.V. identifies a player below the approved age, the account is subject to restriction and any money paid in respect of the use of its services is returned to the person as soon as reasonably practicable. In addition, any winnings obtained by the minor shall be forfeited, in accordance with applicable regulatory requirements. The operator will ensure that deposits are refunded and the account is fully restricted.

Prior to a player's first withdrawal, Brightstar N.V. requires submission and verification of a valid government-issued identity document (such as a passport, national ID, or driver's license) to ensure full compliance with age verification and regulatory standards.

IV. Responsible Gaming Tools

Brightstar N.V. offers a range of responsible gaming tools that enable users to manage their gaming behavior. These tools include, but are not limited to, the following options:

- **Deposit Limits:** Players have the ability to set a daily deposit limit to manage their spending and promote responsible play. This option can be accessed directly through the "My Profile" section of the user's account. Once a limit is reached, no further deposits can be made until the time period has elapsed.

- Decreasing a deposit limit has immediate effect, allowing players to reduce their financial exposure at any time.
- Increasing the deposit limit is subject to a 24-hour cooling-off period, ensuring that the decision to raise deposit limits is considered and not made impulsively.

Any wagers placed before a deposit limit is set, whether resolved or pending, will remain valid and unaffected by the new limit.

- **Cooling-Off Periods (Temporary Suspension):** Brightstar N.V. offers players the ability to take a temporary break from gaming through predefined cooling-off periods of:
 - 24 hours
 - 7 days
 - 1 month
 - 3 months

For cooling-off periods of one month or three months, players may be prompted with a confirmation screen before the restriction is applied. This confirmation must be completed online and is neutrally worded, ensuring players voluntarily acknowledge the impact of a longer-term break. The cooling-off will only be activated once the player confirms their decision.

During the selected cooling-off period, the player's account will be inaccessible, and no gaming activity will be permitted. Once the chosen period expires, the account will automatically be reactivated without the need for any additional action from the player.

Players are clearly informed about the distinction between a Cooling-Off Period and Self-Exclusion at the time of selection. While a cooling-off period is intended as a short-term break, Self-Exclusion is designed for longer-term or indefinite exclusion from the platform. Players are offered the option to proceed directly to Self-Exclusion if they believe a more extended interruption is needed for their well-being.

Upon activation of a cooling-off period, players will receive a confirmation message via email or on-screen notification confirming that the restriction has been successfully applied. This message includes details of the selected duration and reinforces the nature of the break.

Requests for cooling-off periods can be initiated through the "My Profile" section of the user's account or by contacting Customer Support. Requests made via

Customer Support may require additional processing time, and confirmation will be provided once the cooling-off measure is in effect.

Marketing communications will be automatically suspended for the duration of the cooling-off period.

- **Self-Exclusion:** For individuals who feel that gaming is having a negative impact on their well-being or finances, Brightstar N.V. offers a formal Self-Exclusion option. This allows players to fully restrict access to their account for a longer period, during which no gaming activity will be permitted.

Players may choose one of the following Self-Exclusion durations: 1 year, 3 years, 5 years, 10 years, or permanent exclusion. Once a Self-Exclusion has been applied, it cannot be revoked or shortened under any circumstances until the full selected period has elapsed. This measure is in place to ensure that the exclusion is treated as a serious protective step and not as a temporary interruption.

Upon activation of a self-exclusion, any remaining player funds, excluding those under regulatory or AML hold, will be refunded to the player within two business days.

During the exclusion period, players will not receive any marketing or promotional communications. Contact may only occur for purposes of verification, account management, or compliance-related matters. Brightstar N.V. will also take technical steps to block the use of any payment methods previously registered by the self-excluded individual to prevent circumvention attempts through re-depositing.

To ensure the effectiveness of the exclusion, all Self-Excluded accounts are entered into a Self-Exclusion Register, which is maintained for up to seven years following the end of the exclusion period. This register is used solely for the purpose of monitoring and preventing unauthorized access to gaming services by previously excluded individuals.

If, despite these measures, a self-excluded individual or a minor is found to have gained access to gambling services on the platform, Brightstar N.V. is obligated to report the incident to the Curacao Gaming Authority (CGA) within five working days. Such incidents are investigated promptly, and corrective actions are implemented to prevent recurrence.

Players wishing to reactivate their account after the Self-Exclusion period has ended must submit a written request confirming their intention to resume gaming. All such

requests are reviewed by the Responsible Gaming team and are subject to internal approval to ensure that reactivation aligns with responsible play practices.

Self-Exclusion requests can be submitted via the “My Profile” section or through Customer Support. All exclusions are confirmed in writing, and affected players are provided with additional guidance and access to external support resources.

- **Access to Account History:** Players have access to a detailed record of their betting and wagering history through their account dashboard, covering at least the past six months. Records include transaction timestamps and bet outcomes. Upon request, Brightstar N.V. will provide additional historical records beyond six months within 10 working days, subject to CGA guidelines and player identity verification.

All responsible gaming tools can be accessed through the “My Profile” section of a user's account or by contacting Customer Support. Self-exclusion and deposit limit requests made via Customer Support may take additional time to process; confirmation of any changes will be provided once the requested measures are in effect.

V. Identifying Problematic Gaming Behavior

Brightstar N.V. is dedicated to identifying and addressing problematic gaming behavior to ensure a safe, responsible gaming environment for all users. A proactive approach to responsible gaming is central to our operations, and we take multiple steps to monitor and address gambling-related harm.

Brightstar N.V. organizes annual training programs for all relevant personnel, including Customer Support Agents, focused on responsible gaming. These training sessions provide in-depth knowledge of internal controls and policies related to responsible gaming. Key components of the training include:

- **Proactive Monitoring:** Customer Support Agents are trained to actively monitor for signs of compulsive or problematic gambling behavior in their interactions with users. They are instructed to identify warning signs such as increased time or money spent on gaming, chasing losses, or emotional distress tied to gambling.
- **Escalation Procedures:** Agents are taught the protocols for escalating concerns. If problematic behavior is detected, Customer Support Agents may escalate the issue to the Compliance Department for further investigation and intervention, ensuring that any necessary responsible gaming measures are taken in a timely manner.
- **Internal Controls and Support:** The training also covers the internal tools and controls available to agents, including how to implement deposit limits, initiate

temporary or permanent self-exclusions, and provide users with referrals to external gambling support services.

Through these annual training sessions, Brightstar N.V. ensures that all staff members remain knowledgeable about the latest industry standards and practices in responsible gaming. This helps maintain a proactive, informed, and coordinated effort across all teams to protect players from gambling-related harm.

While Brightstar N.V. monitors for signs of problematic gaming, players are also encouraged to be mindful of their own gaming behavior. A list of key indicators, such as excessive gaming or chasing losses, can be found on our Responsible Gaming page. These indicators help users recognize early warning signs of problematic behavior and take appropriate action.

To support users in evaluating their gaming habits, Brightstar N.V. provides self-assessment tools on the Responsible Gaming page. These tools help individuals reflect on their gaming behavior and assess whether it is becoming problematic. Players who feel they may be at risk are encouraged to utilize the responsible gaming tools available, such as setting personal limits or requesting self-exclusion.

For more detailed information on identifying problematic behavior and completing a self-assessment, users are encouraged to visit the Responsible Gaming page on our website.

VI. Support for Compulsive Gambling

Brightstar N.V. actively supports responsible gaming initiatives and partners with organizations that specialize in preventing and treating gambling addiction. Users are encouraged to seek support from these organizations should they or someone close to them be affected by compulsive gambling.

We believe it is crucial to foster a healthy and controlled gaming environment, and we are committed to helping our users maintain responsible gaming habits. For further assistance, users can also contact our Customer Support team, who can guide them toward appropriate resources.

VII. Marketing and Advertising

Brightstar N.V. ensures that all marketing, promotional, and advertising activities are conducted in full compliance with responsible gaming principles as mandated by the Curacao Gaming Authority (CGA). This section outlines the standards, obligations, and internal controls implemented to ensure that all promotional communication prioritizes player protection, avoids misleading practices, and safeguards vulnerable individuals.

1. General Advertising Conduct

Brightstar N.V. is committed to maintaining honesty, integrity, and transparency in all marketing communications. Advertising must not be aggressive, misleading, or excessive. At no time shall gambling be presented as a viable solution to financial hardship or as a guaranteed method of achieving wealth or economic security. Any messaging suggesting that skill can affect the outcome of games of chance is strictly prohibited. In addition, advertising shall not imply that gambling can provide emotional or psychological relief from stress, depression, loneliness, or personal struggles.

2. Protection of Vulnerable Individuals

All marketing efforts are carefully designed not to knowingly or deliberately target individuals who are considered vulnerable to gambling-related harm. This includes, but is not limited to, self-excluded players, individuals displaying signs of problematic gambling, minors, and financially vulnerable persons.

Brightstar N.V. does not use language, imagery, or content formats that may appeal to children or adolescents, such as cartoons, animations, or child-friendly themes. Minors are never depicted in gambling-related advertising, and no representation will imply that gambling is an activity suitable for those under the legal gaming age. The company also refrains from using influencers, public figures, or media personalities who appeal primarily to minors or younger audiences.

3. Direct Marketing Restrictions

In strict adherence to CGA regulations, Brightstar N.V. does not send any form of direct marketing, such as emails, SMS messages, push notifications, or bonus offers, to players who have activated a cooling-off period or who are subject to self-exclusion. These individuals will be excluded from all marketing campaigns until their exclusion has ended, and in the case of self-exclusion, until a written request is submitted by the player for account reactivation. Furthermore, all direct marketing materials must include a clear message promoting responsible gaming and an easily accessible mechanism for opting out of future communications.

4. Responsible Use of Promotions and Bonuses

All promotional campaigns, including bonuses and incentives, are communicated transparently with terms and conditions that are clear, visible, and understandable. Promotional materials must not exaggerate potential winnings or encourage persistent or excessive gambling. Brightstar N.V. does not employ aggressive marketing tactics or time-sensitive pressure to push bonus offers that may lead to impulsive decision-making. The intent behind all promotional campaigns is to enhance the user experience responsibly, without encouraging problematic behavior.

5. Third-Party Marketing Oversight

Brightstar N.V. holds all affiliated third parties, including marketing affiliates, influencers, VIP agents, and brand ambassadors, accountable to the same responsible gaming standards as outlined in this policy. Binding contracts are used to establish these obligations, and compliance is enforced through routine audits and monitoring. Non-compliance may result in immediate termination of the partnership and the application of contractual penalties. Influencers and brand representatives must be of legal age, target content exclusively to adults, and avoid any association with sexually suggestive or harmful content.

6. Advertising by Platform and Medium

Online marketing, including advertising on social media platforms, must be age-gated and clearly marked as originating from a licensed gambling operator. Offline and traditional media advertising must comply with any applicable codes of conduct set by the respective media outlet, especially those related to responsible gambling messaging. Brightstar N.V. does not permit its branding or promotional materials to appear at youth-oriented events, on equipment used by minors, or in spaces where the primary audience is underage. Any sponsorship agreements will include clear responsible gaming messaging as part of the branded content.

7. Commitment to Responsible Gaming Messaging

All advertising, regardless of format or channel, must include a prominently placed message promoting responsible gaming. This reflects Brightstar N.V.'s dedication to ensuring players are consistently reminded to maintain a balanced and healthy approach to gambling. Whether online, offline, or through third-party partners, the company requires the presence of responsible gaming slogans or informational prompts in every instance of marketing exposure.

VIII. Behavioral Monitoring

Brightstar N.V. adopts a proactive and structured approach to monitoring player behavior in order to identify individuals who may be at risk of developing gambling-related problems. The objective of behavioral monitoring is to detect early warning signs of harm and implement timely interventions in line with our responsible gaming framework and regulatory obligations.

1. Behaviour Tracking and Early Detection

The company continuously analyzes player activity using behavioral and transactional indicators that may signal a loss of control or an increased risk of harm. These indicators include irregular or sudden spikes in deposits, high-frequency wagering, extended gaming sessions without breaks, and the repeated reversal of withdrawal requests. In addition, excessive contact with customer support, particularly when marked by agitation, repeated bonus requests, or complaints, can indicate distress and is flagged accordingly.

Special attention is given to players who frequently modify responsible gaming limits, such as repeatedly increasing deposit or loss thresholds, or who initiate multiple short-term cooling-off periods within a condensed timeframe. Spending behaviors that do not align with a player's known demographic profile, or that appear disproportionate for younger players under the age of 25, are subject to further evaluation.

Patterns that suggest circumvention of limits, including the use of multiple payment methods, attempts to register additional cards after reaching a credit limit, or the creation of multiple accounts, are also closely monitored and escalated where necessary.

No single behavioral or transactional indicator shall, by itself, be considered sufficient to classify a player as a potential gambling addict. The identification of at-risk behavior requires the presence of multiple consistent or escalating indicators.

2. Use of Internal Tools and Reports

Brightstar N.V. supports its behavior monitoring efforts through the use of internal tools and reporting systems built into the gaming platform. These tools allow the company to track player activity, generate behavior-related alerts, and identify patterns that may indicate problematic gambling. Reports are regularly reviewed by the responsible team to assess whether any player behavior warrants further investigation or intervention. These internal systems form a core component of Brightstar's monitoring strategy and ensure that behavior tracking is consistent, accountable, and aligned with regulatory obligations.

3. Staff-Led Monitoring and Escalation

While automated systems play a crucial role in pattern recognition, frontline staff such as customer support agents and VIP managers remain essential in observing behavioral indicators through direct interactions with players. These employees are trained to recognize behavioral red flags during conversations, such as emotional distress, expressions of financial pressure, or denial of harmful patterns. When such signs are identified, they are documented and escalated through a formal internal process to the responsible gaming or compliance team for further review.

4. Escalation Triggers and Intervention Protocols

If a player's behavior meets one or more predefined risk criteria, an alert is generated and reviewed by the responsible team. The level of intervention is determined based on the severity and frequency of the indicators observed. Actions may include sending educational materials, recommending the use of self-limitation tools, offering a cooling-off period, or initiating a self-exclusion. All interventions are documented, and the outcomes are evaluated to ensure that the player is receiving appropriate support and that the integrity of the monitoring process is maintained.

5. Legal and Regulatory Alignment

This behavioral monitoring system supports compliance with Article 1.4(e) of the LOK, which prohibits operators from allowing access to games of chance to individuals who, based on reasonable observations, may be considered vulnerable. Through an integrated approach combining data analytics and human oversight, Brightstar N.V. upholds its regulatory duty to identify and protect at-risk players while maintaining a safe and responsible gaming environment.

6. Procedures for Player Identification and Intervention

Brightstar N.V. follows a structured and tiered process to assess, engage, and intervene when behavioral indicators suggest a player may be at risk of gambling-related harm. This approach begins with the creation of player profiles that incorporate relevant data points, such as deposit frequency, wagering patterns, time spent in sessions, and usage of responsible gaming tools. These profiles support an ongoing risk assessment that allows the company to monitor individual player behavior over time. Internal tools are configured to generate real-time alerts when risk thresholds are exceeded, ensuring timely review and response.

When concerning behavior is identified, direct contact is initiated with the player by trained staff. These interactions are handled sensitively and are intended to open a constructive dialogue regarding the player's gaming habits. All communication, along with the indicators that triggered the outreach and any resulting actions, is documented in the Player Account Management system to ensure traceability and continuity in case management.

Players who display signs of at-risk behavior are reminded of the available responsible gaming tools, including deposit limits, time-outs (cooling-off), and self-exclusion options. If the behavior continues or escalates, internal guidelines provide for a range of escalating interventions. These may include the imposition of mandatory deposit limits, the temporary suspension of the player's account pending further review, or, in the case of serious or ongoing risk, full exclusion from the platform. Each step is carried out in accordance with regulatory expectations and guided by a commitment to player protection.

Brightstar N.V. does not exclude or restrict access to its services solely on the basis of a player's winnings. Responsible Gaming interventions are based on behavioral risk indicators and not player profitability or financial outcomes.

IX. Employee Training and Escalation Procedures

Brightstar N.V. maintains a strong internal culture of responsible gaming through structured training and clearly defined escalation protocols. All employees, regardless of department, are required to complete mandatory annual Responsible Gaming training. These sessions ensure that staff remain up to date with regulatory requirements, company policies, and best practices in player protection. The training is tailored to the responsibilities of each department, with specific emphasis placed on teams that have direct interaction with players.

1. Staff Training and Readiness

Customer service agents, VIP managers, and other frontline personnel receive enhanced training designed to prepare them for identifying and responding to signs of gambling-related harm. These sessions cover a variety of essential topics, including how to recognize behavioral cues such as emotional distress, agitation, aggression, or signs of financial desperation.

Employees are taught how to engage with at-risk players using structured, sensitive, and professional communication. They are also trained to direct players toward appropriate support tools such as deposit limits, time-outs (cooling-off), or self-exclusion, as well as external support services where applicable. Proper documentation of these interactions is

- The number of complaints that were referred to an independent Alternative Dispute Resolution (ADR) provider and the subsequent outcomes of each of those ADR cases.
- The number and details of complaints for which a player has taken legal action.

Brightstar N.V. will ensure transparency and compliance with regulatory updates and ADR decisions as required. The CGA also reserves the right to request access to records of any and all complaints received, as well as any disputes that are pending resolution, at any time.

X. Additional Provisions

- **Written Submissions:** All complaints and communications with the casino or the regulator must be submitted in writing, providing complete and accurate information about the player's identity and the nature of the complaint.
- **Timeliness:** Players are encouraged to raise any issues promptly after they arise to facilitate timely and effective resolution. Delays in reporting a complaint may complicate the resolution process.
- **Transparency Commitment:** Brightstar N.V. is dedicated to resolving all complaints in a fair, transparent, and timely manner. While every effort will be made to resolve complaints promptly, more complex cases may require additional time, depending on the availability of information and the nature of the dispute.
- **Terms and Conditions Reference:** Brightstar N.V. ensures that all regulatory requirements related to player complaint procedures, as set out by the Curacao Gaming Authority (CGA), are fully and accurately reflected within the company's Terms and Conditions. This includes, but is not limited to, information regarding contact points, complaint submission procedures, timelines, rights to escalation and ADR, implications for further legal recourse, and the role of the CGA. The Terms and Conditions are regularly reviewed to ensure compliance with the minimum content standards mandated by the CGA.

XI. Contact Information

For inquiries or to submit a complaint, please contact the Customer Support Team at support@spacefortuna1.com

Starkeast Management B.V., Managing Director
Signed by: Menno Jordaan, Managing Director
Date: May 9, 2025