

TH GAMBLING N.V.

Responsible Gaming Policy

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Version Tracking, Release and Changes

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1. Commitment to Regulatory Compliance

As a holder of a B2C license from the CGA TH Gambling N.V. is committed to endorsing responsible gambling practices among our players. We believe in providing a safe, enjoyable gaming environment that encourages responsible play. This policy outlines our efforts to support our players in maintaining control of their gambling activities and to minimize the risks associated with gambling addiction. The Company is fully committed to the following core responsible gaming principles and requirements:

- **Preventing Underage Gambling:** We maintain age verification mechanisms to ensure no person under 18 can register, deposit, or gamble on our websites.
- **Accessible Information and Tools:** Responsible gaming policies, warnings, and tools are prominently displayed and easily accessible on our website (including the homepage, Terms & Conditions, and footer). Players are informed about the resources available to help manage their gambling.
- **Player Self-Assessment:** We provide self-assessment resources that allow players to evaluate their gambling habits and recognize potential risks.
- **Behavior Monitoring:** We empower our frontline staff with tools that enable them to monitor player behavior, allowing for early detection and intervention of problem gambling.
- **Cooling-Off and Self-Exclusion:** We ensure players can easily activate cooling-off periods or self-exclude, with these protective measures taking immediate effect and being rigorously enforced once in place.
- **Deposit/Financial Limits:** Players can set deposit limits (or other limits such as loss or session duration limits) to control their spending, and the Company enforces these limits to prevent excessive gambling.
- **Employee Training:** We ensure that all employees and relevant third parties, such as customer support staff, receive comprehensive training in responsible gaming practices. This equips them to uphold our Policy and assist players appropriately.
- **Commitment to Ethical Partnerships:** We strive to collaborate with industry professionals and reputable partners who share our commitment to responsible gaming. We provide affiliates and marketing partners with guidance, resources, and best practices to help them align with our responsible gaming standards.
- **Ethical Marketing:** All marketing and advertising activities are conducted in line with responsible gaming principles, which include not targeting minors or self-excluded individuals and ensuring all communications are truthful and do not encourage irresponsible gambling.

Through ongoing oversight and periodic internal reviews, the Company continuously evaluates and enhances its responsible gaming measures. This Policy documents the comprehensive approach that management, staff, and partners must uphold, and it

will be updated as needed to remain aligned with evolving regulatory standards and best practices.

2. Scope of the Policy

This Policy extends to all individuals and entities associated with the Company's gaming operations. It encompasses the entire organizational structure, ensuring that responsible gaming principles are upheld at every level. This includes directors, officers, employees, and contracted personnel who play a role in shaping and enforcing responsible gaming measures. Additionally, affiliates, marketing partners, social media influencers, and third-party vendors engaged in promoting or facilitating the Company's services are also bound by this Policy. Their commitment to responsible marketing and ethical promotional activities is essential in maintaining a safe gaming environment. Furthermore, the Policy applies across all digital platforms, websites, and applications operated or controlled by the Company, ensuring that responsible gaming safeguards are embedded into every aspect of the online gaming experience.

3. Visibility of Responsible Gambling Information

Ensuring that players have easy access to responsible gaming information and support resources is a key component of our commitment to safe gambling practices. The Company's approach focuses on providing clear, accessible, and actionable information at all points of the player experience, and on offering support services to assist players in making informed decisions about their gaming activities.

The Company is committed to making responsible gaming information readily available through multiple channels on our products. A dedicated Responsible Gaming section shall be accessible:

- 1) from the website's main page,
- 2) referenced in the Terms & Conditions,
- 3) referenced in a page with the account settings for the Responsible gaming features and other pages related to the Responsible gaming functionality.

This section provides comprehensive guidance on recognizing signs of problem gambling, outlines the player protection tools available, and offers direct links to external organizations that can provide help (such as gambling counseling hotlines and support groups).

In addition to this dedicated page, key responsible gaming messages are prominently displayed across the website: for example, the homepage clearly indicates that gambling is restricted to adults (18+ logo), features a brief responsible gaming

message (such as “Please Play Responsibly”) and links to the full Responsible Gaming Policy, as well as links to independent gambling help resources as well as any relevant local support services in our target markets. The Terms and Conditions of the site explicitly include our commitments to responsible gaming and reference the tools and options players have for their protection.

To ensure information is understandable and inclusive, responsible gaming content is to be provided in all languages relevant to our player base and targeted markets. For instance, if the Company serves players in multiple countries, the Responsible Gaming page and related notices are to be translated accordingly. We also incorporate responsible gaming reminders into player communications through newsletters. These communications aim to educate our players on the importance of maintaining control over their gambling activities and to inform them of the tools and support available to them.

4. Behavioral Tracking

A cornerstone of our responsible gaming approach is the continuous monitoring of player behavior. The Company employs a behavioral tracking framework that monitors a range of player activities, including—but not limited to—deposit patterns, wagering frequency, session duration, withdrawal reversals, and sudden changes in betting patterns.

5. Deposit Limits

One of the most effective ways for players to manage their gambling is by setting financial and time limits on their play. The Company’s products include features that allow players to impose personal limits on various aspects of their gambling activity, directly supporting the CGA’s mandate that operators provide such tools.

Players have the option to set daily, weekly, and monthly deposit limits to help manage their gambling expenditures. These limits can be set via the user-interface by the user itself at all times. Increasing a deposit limit to a higher limit will take 24 hours to take effect, to shield the player from impulsive decisions. Lowering a deposit limit will take immediate effect.

By giving players these controls, we enable them to pre-define boundaries that align with their individual budgets and risk tolerance, thereby reducing the likelihood of excessive gambling.

Integrated Notifications: When players approach or attempts to exceed set limits, the platform automatically generates notifications to players. These notifications serve as reminders to help players manage their spending and may prompt them to review or adjust their responsible gaming settings. This proactive approach ensures that players are continuously aware of their limits and overall financial activity.

Reporting and Compliance: All adjustments to financial limits and related settings are logged and monitored for compliance purposes. This information is periodically reviewed by our responsible gaming team to ensure that the limits in place are effective and that any anomalies are addressed promptly.

6. Cooling Off

A cooling-off functionality provides a short-term, temporary break from gambling that a player can initiate to help manage their gambling activity. Unlike self-exclusion (which is longer-term), cooling-off is designed for players who feel they need a brief pause in play - it may be to regain perspective, deal with temporary financial pressures, or just to ensure they don't gamble impulsively for a while. The Company provides a robust and user-friendly cooling-off mechanism in full compliance with compliance requirements, ensuring it is easily accessible, immediately effective, and honored strictly for its duration.

Availability and Accessibility: Players can activate a cooling-off period at any time. This option is prominently available through the responsible gaming tools in their account settings or can be requested via the support team to make it as quick and barrier-free as possible.

On selecting the cooling-off option, the player is presented with duration choices. In line with regulatory guidance, the Company offers a range of cooling-off durations to suit different needs: typically, options include **24 hours (1 day)**, **7 days (1 week)**, **1 month**, or **3 months**. These options cover brief pauses up to a few months of break. The player chooses the desired duration and confirms their request. At this stage, we also present a gentle reminder explaining the difference between a cooling-off period and a self-exclusion (e.g., noting that self-exclusion is for longer, more serious breaks and cannot be reversed until it ends, whereas cooling-off is shorter and will lapse automatically).

Immediate Activation: Once the player confirms the cooling-off request, the feature is implemented immediately. The player's account is **instantly locked** with respect to all gambling activities for the chosen period. "Instantly" means there is no pending delay or manual approval needed – the product will not allow any new bets, deposits, or gameplay from that moment until the cooling-off period expires. If the player is in the middle of a gaming session or logged in at the time of

activation, they will be logged out or otherwise prevented from continuing to play as soon as the cooling-off is in effect.

The cooling-off can apply to the entire account (all products). We also accommodate players who may wish to apply a cooling-off to specific product verticals only (as allowed by CGA guidelines). For example, a player might choose to take a 1-month break from casino games but still allow themselves to sports bet, or vice versa. Subject to the particular product settings, the system may support selecting one, several, or all gambling categories to which the break applies. If a partial cooling-off is set (restricted to certain types of games), the account will be configured to block activity only on those selected categories while still permitting play on the others. However, we make it clear to players that a full break (all products) is often the safer approach if they are experiencing any gambling issues.

Effects During Cooling-Off: During the cooling-off period, the affected account is in a restricted state. The player **cannot deposit** funds, place any bets, or enter any games for real money. If the player attempts to do so, they will receive a notification that they are on a cooling-off break and cannot continue until the period ends. They are allowed to log into their account for non-gambling purposes, such as withdrawing their remaining balance or accessing their account history (we do not want to trap their funds or data), but even these actions are monitored. Should the player choose to withdraw any remaining balance during the cooling-off, they may do so; however, they will not be able to cancel that withdrawal (to prevent using it as a loophole to get money back into play).

All **marketing promotions and bonuses** targeted specifically to the player are halted once cooling-off begins. During the cooling-off activation process, players are given the option to opt-out of marketing entirely if they wish. If they do not opt-out, they may still receive general marketing materials that do not encourage gambling activity or suggest bypassing the cooling-off restrictions. Personalized promotions, direct bonus offers, or targeted incentives that could influence gambling behavior during the cooling-off period remain strictly prohibited. Our marketing systems ensure that no materials sent during this period include content that could pressure or entice the player to resume gambling before the cooling-off period expires. The only communications players may receive during this period are general company updates, responsible gaming awareness messages, and non-gambling-related promotional content, as well as service-related notifications (such as withdrawal confirmations or support responses).

Reactivation and Expiry: When the chosen cooling-off period expires, the account is automatically reactivated by the system. Unlike self-exclusion, the cooling-off ends without further action, and the player can immediately use the account again. We do not require the player to contact us to reinstate the account; it is seamless, to respect the difference that cooling-off is a milder form of intervention.

No Discouragement or Interference: The Company strictly prohibits any actions that would discourage a player or challenge their intention to apply a cooling-off restriction to themselves.

Monitoring During Cooling-Off: While a player is on a cooling-off break, our system monitors if there are any attempts to circumvent it (for example, if the player tries to create a new account). We guard against duplicate accounts, and if we detect a cooling-off player attempting to re-register under a different identity, our fraud detection will catch it and block that account as well, escalating it to a potential self-exclusion scenario.

By providing a clearly visible, immediate, and effective cooling-off feature, the Company offers players a valuable tool to control their gambling on their own terms. It serves as an important harm reduction measure, allowing impulsive urges to subside and giving players time to reassess their entertainment in a pressure-free environment. We see cooling-off as an essential component of a balanced responsible gaming program, addressing short-term needs while other tools like self-exclusion address longer-term issues

7. Self-exclusion

We offer a self-exclusion facility for players who wish to take a break from gambling. This can be for a definite period or indefinitely, depending on the player's needs. Requests for self-exclusion can be made through our customer support team, who are trained to assist with these inquiries promptly and sensitively.

Compared to a cooling-off, self-exclusion is a more extensive and serious measure intended for those who need a long-term break from gambling or who recognize that they are at risk of developing, or have already developed, a gambling problem. The Company's self-exclusion program is designed to be comprehensive, easy to initiate, and strictly enforced, in full alignment with the CGA Responsible Gaming Policy and the LOK requirements.

Definition and Scope: Self-exclusion allows a player to voluntarily ban themselves on a sufficiently longer term compared to cooling off from accessing *all* real-money gambling services on our products for a chosen length of time. Self-exclusion is intended for individuals who feel that gambling has become or could become harmful to them and who need a significant break to regain control. It is often taken as a preventative measure or as a step toward recovery from problem gambling.

The available option of duration of self-exclusion shall meet the regulatory standards. The Company offers at minimum a one-year (12-month) self-exclusion as required by regulation in force. In addition, we provide options for longer terms: commonly 3 years, 5 years, or 10 years. We also offer a **permanent/lifetime self-**

exclusion option for those who decide to cease gambling indefinitely. These options are clearly presented to the player at the time they choose to self-exclude. We do not offer any self-exclusion shorter than 1 year via this tool (for shorter breaks, the cooling-off function is appropriate).

Self-exclusion can either be total or, in certain cases, partial by product vertical. By default, a self-exclusion request is applied to all forms of gambling (online slots, live casino, sports betting, poker, etc.). If a player explicitly requests to exclude only from certain verticals (for example, exclude from sports betting but not from poker), we accommodate this, but we also counsel them that a full exclusion might be more effective if they have a gambling issue.

Activation Process: The self-exclusion process is straightforward and **fully self-service** through the product. In the account's Responsible Gaming section or a similarly prominent area, there is an option to "Self-Exclude" with an explanation of what that means. If the player selects this, the system will guide them through a short process: they choose the duration of exclusion from the predefined options, and they must confirm their understanding that during the exclusion they will not be able to gamble and that the decision is irreversible until the period ends. We ensure that the entire process of initiating a self-exclusion online can be completed in one session and typically in just a few minutes. It does not require any back-and-forth or additional steps of approval or confirmation that could deter the player. Once the process is completed the self-exclusion is applied immediately.

We also support alternative channels for self-exclusion. If a player prefers, they can contact our customer support via live chat or email to request self-exclusion. For security, if done by email, we require the email to come from the address registered on the account, and the support team will perform some identity verification (such as asking for some account details) to ensure it's truly the account holder making the request. Once identity is confirmed, the support agent will process the self-exclusion on the player's behalf with the same immediacy. The time it takes on a support channel might depend on the conversation, but our policy is to handle such requests with top priority - meaning an agent will interrupt other tasks to set the exclusion right away during the contact.

Importantly, the player does **not** need approval from the Company to self-exclude. We have removed any unnecessary barriers: there is no need for the player to justify their decision or discuss it with us (though if they wish to talk, we are there to listen and help). The forms and prompts are concise, typically taking well under 15 minutes to complete.

Immediate and Irreversible Action: Once a self-exclusion is set, it takes effect across the product instantly. The player's account status is changed to "Self-Excluded" which triggers a cascade of enforcement actions:

- The account is locked entirely making it impossible for the player to log in. For any non-gaming actions like withdrawing remaining funds or requesting

the transaction history, the player must contact the support team who will accommodate the request manually.

- **Any ongoing games or tournaments:** If the player is in the middle of gameplay or has any unsettled bet, we handle those scenarios according to our terms. Usually, outstanding bets are still honored (the outcome will be settled normally and any winnings will be available for withdrawal, but the player cannot use them for new bets). For live tournament games, the player may be treated as having left (forfeiting further participation), etc.
- **Payment methods:** We flag any payment instruments associated with the self-excluded account (credit cards, e-wallets, bank accounts used) so that if someone tries to use the same payment details to set up a new account, it will raise an alert of a possible self-excluded player trying to re-enter, enabling us to block it.
- **Marketing suppression:** The player's details are immediately removed from all marketing databases. They will not receive any promotional or marketing material during the self-exclusion. This extends to affiliates – we instruct our affiliates to cease targeting that player if they have personal marketing info.

Once self-exclusion is active, **the player cannot revoke or shorten it**. This is made clear at the time of opting in. The player must wait until the full term of their selected exclusion has passed. This rule is in place to prevent people from making impulsive self-exclusion decisions and then quickly changing their minds when an urge to gamble returns; it enforces the seriousness of self-exclusion as a commitment to stopping harmful behavior. In rare cases where a player might claim the self-exclusion was a mistake (e.g., they clicked wrong), we have an internal review, but generally, we err on the side of keeping the exclusion, at least for a shorter cooling-off, to ensure protection.

Consequences of Self-Exclusion: During the self-exclusion period, the account remains closed. For any non-gaming activity such as withdrawing any remaining balance or reviewing the transaction history, the player must contact the support team that will facilitate the request manually. If a player has funds in their account at the time of self-exclusion, they are encouraged to withdraw them. The Company will attempt to refund any remaining account balance back to the player's deposit method within a short period (typically within two business days), as long as doing so doesn't conflict with any AML hold or other legal investigation.

All bonus funds or promotional offers in the account are forfeited at self-exclusion (since these cannot be converted to cash except by gambling, which is now disallowed).

While self-excluded, the player will not be able to open any new account with the Company. Our systems will reject attempts to register a new account with the same personal details (name, address, email, device fingerprint, etc. – we use a combination of these to catch matches). If a self-excluded individual manages to create a second account by slightly altering details, as soon as it is discovered (and we do various audits to find such cases), that account will be closed too, any deposits

will be returned and winnings forfeited, just as if it were the original account (this is also to dissuade trying to cheat the system). We maintain a **Self-Exclusion Register** internally where all self-excluded persons are listed along with relevant identifying details. This register is kept confidential and secure, and entries are maintained for at least seven years after the end of the exclusion period, per regulatory guidelines, to ensure that even former exclusions are known for historical checks.

Encouraging Self-Exclusion and Communication: We ensure that information about how to self-exclude is clearly communicated on the website. The Responsible Gaming page outlines the steps and emphasizes that players should not hesitate to use this tool if they need it. Customer support agents are instructed that if a player ever indicates a desire to stop gambling or shows serious signs of addiction, offering the self-exclusion option and explaining it is a priority. It is strictly prohibited for the customer support team to discourage or delay the decision of the player to self-exclude themselves, as well as try to re-confirm the decision or consider alternative features.

Reactivation and Post-Exclusion Protocol: Once a self-exclusion period has fully elapsed, the default stance of the Company is *not* to automatically reactivate the player's ability to gamble without interaction. We require the player to take positive action to come back. Specifically, after the exclusion period, the player must contact us to reopen their account for gambling. When we receive such a request, we have a defined process before reactivation:

1. **Written Confirmation:** We typically request the player to provide a written or recorded confirmation (this could be as simple as an email from their registered address or filling out a short reactivation form) stating that they wish to resume gambling and that they understand the risks and will continue to use responsible gaming tools as needed. This step is to ensure there is a deliberate intention and not just a spur-of-the-moment action.
2. **Review of Account and Discussion:** A member of the Responsible Gaming Team or a trained support agent will review the player's prior gambling history and the circumstances of their self-exclusion. If the exclusion was triggered by explicit problem gambling signs, we might reach out to the player for a brief conversation about their decision to return. We approach this conversation in a supportive way: the aim is to gauge if the player feels in control and to remind them of tools to help them stay in control. It's not to judge or block them unless we have a strong reason but to reinforce that we care about their well-being.
3. **Self-Assessment Encouragement:** Upon reactivation, we encourage the returning player to take a self-assessment test (like the Gamblers Anonymous 20 questions or a similar survey) or at least to read through our responsible gambling tips again. We may require them to re-read the Responsible Gaming Policy or acknowledge it once more as a condition of returning.
4. **Safeguards on Account:** We often suggest or even require certain safety measures initially. For example, we might set conservative default deposit or

loss limits on the account or ask the player if they want to set such limits themselves immediately. The idea is to ease back into play gently rather than with full unlimited access from the get-go.

5. **Management Approval:** The final reactivation typically is approved by a supervisor or the Responsible Gaming Officer. Only after all these steps are satisfactorily completed will the account be unlocked for normal play.

Operator-Initiated Exclusion: In extreme scenarios, the Company itself can initiate an exclusion on behalf of a player (even if the player has not directly requested it) - for example, if we have clear evidence of severe gambling-related harm or if a player is engaging in fraudulent or criminal behavior. This is considered a last-resort responsible gambling intervention or a security measure. We document such cases thoroughly and keep records in accordance with the current Policy. Operator-initiated exclusions are treated with the same rigor of enforcement as self-exclusions. The affected individual is informed of the decision and the reasons, and it is explained to them under what conditions, if any, they may appeal or return in the future. Typically, if done for responsible gambling reasons, we would not consider reactivation until a certain period has passed and we have reliable assurance of improved circumstances

8. Resources and Support

8.1 Self-Assessment Tools

Self-assessment is an important resource that allows players to privately evaluate their own gambling behavior. On our Responsible Gaming page, the Company provides self-assessment tools and information on help organizations to help players reflect on whether their gambling habits might be problematic and to encourage them to seek help if necessary.

In summary, self-assessment tools are provided to help players identify potential problems early. Players showing signs of gambling-related harm through these self-evaluations are gently prompted to utilize our support measures (deposit limits, self-exclusion) and are directed toward professional help resources when necessary. Our goal is to give players the means to honestly appraise their gambling and take action before a problem develops or worsens.

9. Escalation Procedures

In instances where there is uncertainty about a player's situation or wellbeing, the decision to reopen an account is escalated. Such cases require approval by a senior member of staff, ensuring that decisions are made with the utmost consideration for the player's welfare.

10. Consumer Advertising and Marketing

The Company will not engage in irresponsible advertising.

- No Targeting of Vulnerable Groups - Marketing including visual content must not directly target Vulnerable People.
- No Portrayal of Gambling as an Investment - Advertising must not promote gambling as a way to achieve financial success or solve financial difficulties.
- No Misrepresentation of Skill vs. Chance - Marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
- No Emotional Manipulation - Advertising must not portray gambling as a substitute for financial, emotional, or mental well-being
- Marketing materials must not feature minors or depict them engaging with gambling content.
- No Explicit content - Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
- No Encouragement of Unrelated Harmful Behaviours - There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.
- Bonus Conditions
 - o Bonuses and promotions must be communicated transparently with clear terms and conditions.
 - o The Company must not use bonuses to encourage excessive gambling.
- Third Party Involvement

The Company remains responsible for materials provided to affiliates, representatives, sponsorships, ambassadors social media influencers, including wordings and visual representations, where the influencers actions and/or statement are paid placement or advertisement.

- o The Company must make any contracted third-party aware of their Responsible Gaming policy and require them to adhere to it.
- Responsible Gaming Messaging - All advertising must include a clearly visible responsible gaming message or slogan.

11. Training and Staff Readiness

The Company ensures training to customer service and Responsible Gaming staff to handle player interactions professionally and effectively.

Training will cover, at least:

- Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation).
- Conducting sensitive and structured conversations with at-risk players.
- Directing players to appropriate support resources and Responsible Gaming tools.

12. Enhanced Responsible Gambling measures

Based on higher levels of risk in its business model, the Company may decide to implement enhanced measures regarding responsible gambling. Higher levels of risk may be due to the business model being inherently high risk -or because of a disproportionately high number of players being assessed to be at risk or the numbers of players choosing to exclude/cool-off.

13. Compliance & Continuous Improvement

This Responsible Gambling Policy is developed as an active, evolving framework that the Company commits to regularly assess and improve. We are fully committed to compliance with all regulatory requirements in Curaçao's jurisdiction and to fostering an organizational culture of ongoing enhancement in player protection. The following governance and improvement practices are in place:

Regulatory Compliance

We comply with the National Ordinance on Games of Chance (LOK) and all directives of the Curaçao Gaming Authority (CGA) related to responsible gaming. This policy incorporates the mandatory standards outlined by the CGA's Responsible Gaming Policy for licensed operators. The Company ensures that every measure described (from age verification to self-exclusion to advertising standards) meets or exceeds the legal requirements. Compliance is monitored continuously, and we prepare required reports or certifications as mandated by the regulator. In the event of updates to laws or regulations, we promptly adapt our policies and procedures to remain in full compliance.

Responsible Gaming Officer & Management Oversight

The Company's organizational structure provides for a designated Responsible Gaming Officer (or an equivalent role/responsible manager) who is responsible for the implementation and day-to-day oversight of this policy. In the absence of a Responsible Gaming Officer, these functions and responsibilities are assigned to a Compliance Officer as a temporary measure. The Responsible Gaming Officer's duties include monitoring the effectiveness of responsible gambling measures, handling escalated cases of problem gambling, training staff, and serving as a point of contact with regulatory authorities regarding player protection matters. Additionally, our executive management and Board of Directors are actively involved in overseeing our responsible gambling strategy.

Employee Training and Awareness

Continuous training is provided to all employees who interact with customers or customer data (including customer support, marketing, payments/fraud, and management teams) on responsible gambling practices. New employees receive training on our responsible gambling policy as part of their induction. All staff either recruited or contracted are educated on how to spot potential gambling problems (warning signs) and the correct, empathetic ways to respond or escalate the issue. We conduct refresher training sessions at least annually, and whenever policies are updated, to keep staff knowledge current. Training covers the use of our internal tools as well (for example, how to apply a self-exclusion to an account, or how to handle a conversation with a player showing signs of distress). By ensuring our team is knowledgeable and confident in applying responsible gambling measures, we maintain a strong first line of defense in player protection.

Internal Controls and Audit

The Company has internal controls in place to ensure this Responsible Gambling Policy is effectively enforced. Our systems are configured to enforce limits, exclusions, and other restrictions automatically wherever possible. We perform periodic internal audits to verify that our procedures (like age verification checks, self-exclusion processing, or marketing list filtering) are working as intended and that no gaps exist. Any incidents or failures are documented and reviewed so that we can improve our processes. We also maintain thorough records of responsible gambling interactions (such as records of self-exclusion requests, copies of customer communications about gambling problems, and log files of any automated interventions). These records are available for review by regulators and form part of our compliance audits.

Monitoring and Reporting Obligations

We track various statistics related to responsible gambling and report to regulators as required. For example, we compile data on the number of self-exclusions,

cooling-off activations, limit-setting usage, and any significant responsible gambling incidents. If the CGA or other relevant authority requires notification of a particular event (such as a player demonstrating gambling-related harm or an operator-initiated exclusion), we comply promptly.

Continuous Improvement

The Company is committed to continuously reviewing and refining our responsible gambling measures. This policy and its implementation are reviewed at a minimum on an annual basis. We take into account feedback from players (for instance, suggestions or complaints about responsible gaming features), observations from our staff who handle responsible gambling cases, and developments in industry best practices. If more effective strategies or tools become known in the industry, we assess and adopt them as appropriate. Likewise, technological advancements that could enhance player protection (such as new monitoring software, better identity verification, etc.) are regularly evaluated. Our approach is proactive - we do not wait for issues to arise; instead, we actively seek ways to strengthen our safeguards.

Collaboration and Industry Standards

The Company participates in responsible gambling initiatives and stays aligned with industry standards beyond our immediate jurisdiction. While we tailor our policy to Curaçao's regulatory framework, we also consider the guidelines and codes of conduct from respected international bodies and jurisdictions (e.g., we may look at standards from jurisdictions like the UK or EU for best practices, without explicitly referencing them in our policy). We engage with industry groups, attend seminars/training on responsible gambling, and in general remain open to learning and adopting global best practices that elevate player safety.

Policy Accessibility and Review

This Responsible Gambling Policy is made available to all employees and is published on our internal knowledge base. For transparency, a summary of our Responsible Gambling commitments is also available to players on our website (typically in the Responsible Gaming section). Internally, the policy document is version-controlled. Updates to the policy are communicated to staff, and significant changes are accompanied by additional training if needed. We foster an environment where staff can provide input or raise concerns about the policy's execution - front-line employees are often best positioned to spot emerging issues or suggest improvements. Management reviews these inputs during policy update cycles.

By enforcing strict compliance and striving for constant improvement, the Company ensures that our Responsible Gambling Policy remains effective and up-to-date. We recognize that as the gambling landscape evolves - through new technologies, new games, and new player behaviors - so must our approaches to player protection. Our

commitment is to never be complacent. We treat responsible gambling as a core aspect of our business integrity and success.

14. Continuous Commitment

In conclusion, responsible gambling is central to the Company's mission and values. We are dedicated to providing a product where players can enjoy gaming entertainment responsibly, with strong safeguards in place. We will continue to evaluate our policies and innovate our practices to enhance player protection. Through regulatory compliance, staff vigilance, player education, and technological support, the Company aims to maintain the highest standards of integrity, safety, and social responsibility in all our gambling operations. We believe that a sustainable business is one that cares for its customers - and that means ensuring gambling remains a positive, safe experience for everyone involved.. We encourage our players to gamble responsibly and offer various tools and resources to support this goal. Our customer support team is available to assist with any concerns or questions related to responsible gambling.