

Responsible Gaming procedures

Version 1.0

Article 1: Introduction

1.1 Purpose

This Responsible Gaming Policy is designed to create a safe and controlled gambling environment by implementing measures that minimize the risks associated with problem gambling. It aims to protect both players and stakeholders by promoting responsible gaming practices and offering tools to help individuals manage their gambling behaviour effectively.

The policy is aligned with the guidelines and standards set forth by the Curaçao Gaming Authority, ensuring compliance with local and international regulations under the LOK framework. The policy applies comprehensively to all individuals involved in the gaming ecosystem, including players, staff members, affiliates, and partners. This broad scope ensures that everyone engaged in gaming operations shares the responsibility of upholding safe gambling practices.

Additionally, the policy focuses on providing players with information and resources to make informed decisions, supporting those who may be at risk of developing gambling problems. It includes preventative measures such as setting activity limits, offering self-exclusion options, and establishing procedures for identifying and addressing harmful gambling behaviours.

1.2 Scope

This policy governs all gambling activities conducted by Kika Technology B.V. under the gaming license issued by the Curaçao Gaming Control Board. It applies to a wide range of individuals and entities, including employees, marketing partners, and all other stakeholders who have a role in the gaming operations. These parties are required to adhere to the policy's provisions, ensuring that all involved in the gaming process share responsibility for maintaining a safe and responsible gambling environment.

1.3 Commitment to Responsible Gaming

Kika Technology B.V. is dedicated to ensuring that gambling remains a fun and responsible form of entertainment for all players. To achieve this, we have implemented a combination of mandatory and voluntary safeguards designed to protect vulnerable players from the risks associated with gambling. These safeguards include setting activity limits, providing self-exclusion options, and offering support tools to help players maintain control over their gambling behaviour.

Additionally, we prioritize regular training for our staff and ongoing policy reviews to ensure continuous alignment with changing regulations and industry standards. This proactive approach guarantees that we remain fully compliant and committed to fostering a safe and enjoyable gambling environment.

Article 2: Marketing & Advertising Compliance

2.1 Prohibited Advertising Practices

In line with our commitment to responsible gaming and player protection, we uphold strict guidelines regarding marketing and advertising practices to ensure that all promotional efforts are transparent, ethical, and aligned with industry standards. The following advertising practices will not be permitted:

1. **Misleading Claims About Winning**
Gambling promotions will not make misleading or exaggerated claims regarding the likelihood of winning or the potential rewards. All marketing communications will accurately reflect the odds and nature of the gambling experience.
2. **Marketing to Self-Excluded Players**
Gambling promotions will not target individuals who have voluntarily excluded themselves from gambling activities. Self-exclusion is an important tool for players who choose to take a break or stop gambling entirely.
3. **Marketing to Financially Vulnerable Individuals**
Gambling promotions will not target or appeal to individuals who are financially vulnerable, including those experiencing financial hardships.

2.2 Affiliate & Influencer Compliance

All marketing partners, including affiliates and influencers, must adhere to the advertising guidelines set by the Curaçao Gaming Authority. This ensures that all promotional content is responsible, ethical, and complies with local regulations. Specifically, the following practices will not be permitted in any marketing materials:

1. **Minors or Child-Friendly Characters**
Marketing materials will not include minors or child-friendly characters, as these could appeal to younger audiences and encourage underage gambling. All advertising must target individuals of legal age and must not inadvertently attract a minor audience.
2. **Sexualized Content**
Gambling promotions will not feature sexualized content, imagery, or messaging that may be considered inappropriate, or offensive. All advertisements must maintain a standard of professionalism and respect for the audience, ensuring that the content is suitable for a general audience and does not exploit sexual imagery.
3. **Gambling as a Financial Solution**
Promotions imply that gambling is a legitimate way to solve financial problems. Advertisements should focus on gambling as a form of entertainment, not as a way to achieve financial gain. This approach prevents the exploitation of individuals who may be financially vulnerable and ensures that gambling is presented responsibly.

Article 3: Player Protection & Responsible Gambling Tools

3.1 Access to Responsible Gambling

Ensuring that players are well-informed about the potential risks of gambling and have access to the necessary tools to make responsible decisions is one of the aspects of our commitment to promoting safe gambling practices. To achieve this, the Responsible Gaming Policy will be prominently displayed across multiple areas of the gaming platform. This includes being easily accessible on the homepage, within the Terms & Conditions, and in the footer of all gaming sites and apps.

By ensuring the RG Policy is visible and readily available in these key areas, we are making it easier for players to access critical information at any time during their gambling experience. This transparency encourages players to make informed decisions about their participation in gambling activities and reinforces our commitment to their well-being.

Additionally, players will have direct access to a range of responsible gaming tools. These tools are designed to help individuals manage their gambling behaviour and include features such as setting spending limits, tracking gaming activity, and using self-exclusion options when needed. By providing easy access to these resources, players are empowered to take control of their gambling habits and prevent the risks associated with problem gambling.

3.2 Self-Assessment Tools

To help players assess their gambling habits, we offer self-assessment tools like the GamCare Test and the CAGE Questionnaire. These tools are intended to assist players in identifying potential signs of gambling issues and guide them in taking appropriate actions to manage or resolve any concerns.

The CAGE Questionnaire

Players are encouraged to answer the following questions honestly:

- C – Cut Down: Have you ever felt you should cut down on your gambling?
- A – Annoyed: Have people ever annoyed you by criticizing your gambling habits?
- G – Guilty: Have you ever felt guilty about your gambling?
- E – Eye-Opener: Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be necessary.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

If any concerning behaviour is identified through the self-assessment, it is necessary to recommend that the player explore the responsible gambling tools available.

In line with our dedication to responsible gambling, we make sure that customer support staff are trained to recognize signs of concerning behaviour during player interactions. If any concerning verbal cues are identified in a chat session with the user, the support team will ask the player RG questionnaires to evaluate whether they might be facing gambling-related issues.

The questions aim to identify early indicators of problematic gambling behaviour. Depending on the answers, customer support will offer the necessary guidance, suggest available responsible gambling tools, and refer the player to professional assistance or support services, if needed.

Article 4: Cooling-Off & Self-Exclusion

4.1 Cooling-Off Periods

To encourage responsible gambling, players have the option to take a break from gambling activities, including both gaming and sports betting, through the Cooling-Off limit. This feature is designed to give players a temporary break from gambling, allowing them time to reflect on their behaviour and regain control.

Players can choose from the following Cooling-Off Period options:

- 1 day
- 3 days
- 1 week
- 1 month
- 3 months
- 6 months

Once activated, the Cooling-Off Period will immediately prevent the player from making deposits or participating in any gambling activities across both the gaming platform and sports betting. The cooling-off feature requires no approval and is designed to be a quick and effective tool for players to temporarily step away from gambling. Players will also be excluded from receiving promotional materials and marketing communications.

4.2 Self-Exclusion Process

To support players who wish to take a more extended break from gambling activities, we offer a Self-Exclusion Process. This option allows players to temporarily or permanently exclude themselves from gambling activities across both gaming and sports betting platforms. Players can choose from the following self-exclusion durations:

- 1 year
- 3 years
- Lifetime

Once the self-exclusion is activated, the player will be unable to access any gaming services or place any bets across all brands and domains operated by Kika Technology B.V. This ensures that the exclusion is comprehensive and prevents access to any associated platforms.

To ensure the self-exclusion is effective and cannot be bypassed, any duplicate accounts created by the same player will be blocked, and previously used payment methods will also be restricted. This prevents players from circumventing the self-exclusion by creating new accounts or using alternative payment methods to continue gambling.

4.3 Post-Exclusion Reactivation

Once the self-exclusion period has ended, players who wish to resume gambling activities must follow a clear and structured reactivation process. This ensures that players are fully prepared to return to gambling in a responsible manner. The reactivation process includes the following steps:

1. **Submit a Written Request for Reactivation**
The player must formally request the reactivation of their account in writing. This ensures that the decision to return to gambling is thoughtful and deliberate, allowing the player time to reconsider their commitment to responsible gaming.
2. **Acknowledge Responsible Gaming Reminders**
Upon reactivation, the player is required to acknowledge and review a series of responsible gaming reminders. These reminders will outline the risks of gambling and provide information on the tools available to manage their gambling behavior. By acknowledging these reminders, the player is reaffirmed in their understanding of the importance of responsible gambling.
3. **Complete a Self-Assessment**
Before resuming play, the player must complete a self-assessment to evaluate their current gambling behavior. This could involve using tools like the CAGE Questionnaire or similar responsible gaming assessments. The self-assessment helps determine whether the player is ready to resume gambling safely, or if further precautions are needed.

Article 5: Deposit Limits & Financial Management

5.1 Deposit & Wagering Limits

To support responsible gambling practices and help players manage their spending, players have the option to set daily, weekly, or monthly deposit limits.

- **Deposit Limits:** Players can set limits on the amount they are allowed to deposit into their accounts within a specified period (daily, weekly, or monthly). This ensures players can control their spending and avoid excessive gambling.
- **Wagering Limits:** Players can set limits on the amount they are willing to wager within a specified period (daily, weekly, or monthly) also, it is important to note that wagering limits do not apply to sports betting. This means that players will be able to set betting limits for gaming but will not be able to apply the same limit to their sports betting activities.

Limit Adjustments:

- **Decreasing Limits:** If a player decides to reduce their limits, the change will take effect immediately, allowing for instant adjustments to their gambling behavior.
- **Increasing Limits:** If a player requests to increase their limits, a 7-day waiting period will be enforced before the new limit is applied. This ensures players have time to carefully reconsider their decision before increasing their limits.

5.2 Other Limits

In addition to deposit and wagering limits, players can set additional limits to help manage their gambling behavior effectively. These limits provide players with greater control over the amount of time and money spent on gambling activities.

- **Loss Limits:** Players can set loss limits to determine the maximum amount they are willing to lose within a given period (daily, weekly, or monthly). Once this limit is reached, they will be unable to continue gambling until the next period begins. Please note, loss limits do not apply to sports betting. This limit is available only for gaming activities in casino, ensuring players can control the amount of money they are prepared to lose.
- **Session Limits:** Players can set session time limits to control the amount of time they spend on gambling activities during a single session. This encourages players to take breaks and manage their time effectively. Please note, session time limits do not apply to sports betting. These limits are specific to gaming activities, helping players avoid prolonged sessions in games.

Article 6: Age Verification & Underage Gambling Prevention

6.1 Legal Age Restriction

Gambling is strictly prohibited for individuals under the age of 18. This restriction is in place to ensure that minors are protected from the risks associated with gambling, and to comply with the legal age requirements in the target jurisdiction. All players must meet the minimum legal age requirement before engaging in any gambling activities, whether in gaming or sports betting.

To enforce this policy, mandatory age verification procedures are applied during the account registration process, as outlined in section 6.2. Any attempt to engage in gambling activities by an underage individual will result in immediate account suspension and the forfeiture of any deposits made.

6.2 Age Verification Procedures

To ensure compliance with the legal age restriction, mandatory identity verification is required for all players during the account registration process. Players must provide valid identification,

such as a government-issued ID, passport, or driver's license, to confirm their age before accessing any gambling services.

Additionally, AI-based verification systems or third-party databases may be employed for further validation of a player's identity and age. This added layer of verification helps strengthen the process and prevent any potential fraudulent activity.

If any account is suspected to belong to an underage player, it will be suspended immediately. All steps will be taken to ensure that underage individuals do not gain access to gambling activities, and any funds deposited will be refunded in accordance with the applicable regulations.

6.3 Consequences for Underage Gambling

If it is determined that an underage individual has accessed and participated in gambling activities, the following actions will be taken:

1. Any deposits made by the underage individual will be refunded within a reasonable time frame. However, deposits frozen under Anti-Money Laundering procedures will not be refunded until the issue is fully resolved, in line with regulatory requirements.
2. Any winnings accrued by the underage player will be forfeited. This ensures compliance with regulations that prohibit minors from participating in gambling and benefiting financially from it.
3. A detailed report will be submitted to the Curaçao Gaming Authority within five working days. This report will include:
 - A description of the breach, detailing how the underage individual gained access.
 - The corrective actions taken, including account suspension and refunding of any deposits.
 - Any additional relevant details required by the CGA to ensure full compliance with the law

Article 7: Player Behaviour Monitoring & Early Detection

7.1 Behaviour Tracking

As part of our commitment to responsible gambling, we employ a Risk Scoring System to monitor and assess player behaviour continuously. This system is designed to help identify signs of potentially harmful or problematic gambling behaviour at the earliest stage. The team will adopt various practices to identify potentially suspicious or harmful behaviour by players, monitoring multiple factors.

The Risk Scoring System provides an effective means of detecting early warning signs, allowing the team to intervene when necessary and provide support to players before issues escalate. By evaluating these factors, we can assess the level of risk associated with each player's gambling activity and take appropriate action.

7.2 Intervention Procedures

If concerning behaviour is noticed, the player will be contacted to discuss the situation and offer help. Based on the level of concern, the following actions may be taken:

- **Providing Responsible Gaming Resources:** The player will be given information and links to support services, educational materials, or tools that help manage gambling behaviour.
- **Setting Deposit Limits:** The player may have deposit limits applied to control how much they can deposit, either daily, weekly, or monthly, to help manage their spending.
- **Temporarily Suspending the Account:** If further review is needed or the behaviour is worrying, the player's account may be temporarily suspended to give them time to reconsider their gambling habits.
- **Initiating account closure:** If the behaviour shows signs of a more serious gambling problem, we may close the account. This will prevent the player from accessing their account for a set period, giving them time to reflect and seek support.

Article 8: Staff Training & Internal Compliance

8.1 Employee & Customer Support Training

It is essential that all staff members, particularly those in customer support roles, are trained to recognize signs of gambling addiction and other responsible gambling issues. This training is critical in ensuring that our team can identify early warning signs of problematic behaviour and provide the necessary support to players.

To achieve this, training will be conducted using a combination of internal and external resources. The internal training will focus on our specific policies and procedures related to Responsible Gaming. External resources will include specialized training from industry experts, offering updated insights on the latest responsible gaming practices and strategies for supporting vulnerable players.

By utilizing both internal and external training resources, we ensure that our employees are well-equipped with the knowledge and skills needed to assist players effectively and promote a safe gambling environment. This training is essential for providing appropriate guidance and intervention when necessary, fostering a culture of responsibility and care within the company.

8.2 Responsible Gaming team

A dedicated Responsible Gaming team is in charge of overseeing the implementation and ongoing management of the Responsible Gaming policy. This team is responsible for ensuring that the policy is effectively applied across all gaming operations and that responsible gambling practices are consistently followed.

To maintain the effectiveness of the policy, an annual review of the Responsible Gaming policy will be conducted. This review will assess the policy's performance, identify any areas for improvement, and ensure that the policy remains aligned with the latest regulatory requirements and industry best practices.

Following the review, a comprehensive report will be submitted to executive management. This report will include findings, recommendations, and any necessary updates to the policy. In the event that changes are made to the policy, a detailed report will also be submitted to the Curaçao Gaming Authority to ensure ongoing compliance with regulatory standards.

Article 9: Incident Reporting & Regulatory Compliance

9.1 Incident Reporting to CGA

In the event that an underage player or a self-excluded individual gains access to the platform, the following immediate actions will be taken:

1. The account of the underage or self-excluded player will be immediately blocked, preventing any further gambling activity.
2. All deposits made by the player will be fully refunded within two business days. This ensures that no financial harm is caused by the unauthorized access. Any deposits that have been frozen under Anti-Money Laundering policies will follow the appropriate AML process before being refunded.
3. A comprehensive report of the incident will be submitted to the Curaçao Gaming Authority within 5 working days. The report will include:
 - The nature of the breach and how the underage or self-excluded player accessed the platform.
 - The corrective actions taken, such as the blocking of the account and the refund of deposits.
 - Any other relevant details as required by the CGA to ensure full regulatory compliance.

9.2 Audit & Compliance Checks

To ensure transparency and adherence to responsible gaming standards, records of all exclusions will be maintained for a period of 7 years. These records serve as documentation to verify that all actions taken in relation to player safety and compliance are properly tracked and accessible for review.

The company will be ready to provide the records whenever it is requested by CGA.

Article 10: Policy Review & Amendments

10.1 Ongoing Review

This policy will undergo an annual review to assess its effectiveness and ensure it remains aligned with current regulations and best practices. The review process will evaluate the policy's performance, identify areas for improvement, and ensure that it continues to meet the evolving needs of responsible gaming.

Any changes or updates to the policy, based on the review findings, will be submitted to the Curaçao Gaming Authority (CGA) for approval to ensure ongoing regulatory compliance.

Article 11: Legal Compliance & Regulatory Obligations

11.1 Regulatory Oversight

We are fully committed to complying with all regulatory reporting and auditing requirements set by the Curaçao Gaming Authority. This includes ensuring that all required documentation, records, and reports are submitted in a timely manner, in full accordance with legal and regulatory standards. Our goal is to maintain transparency and ensure our operations remain fully compliant at all times.

Article 12: Compliance and Reporting

12.1 Documentation of Activities

We are committed to maintaining accurate and up-to-date records of all self-exclusion activities and actions. These records will be documented in real-time to ensure transparency and compliance with regulatory requirements. This includes tracking the initiation, modification, or termination of any self-exclusion requests.

All records will be securely stored and readily accessible for review. Should the Curaçao Gaming Authority request access to these records, we will provide them promptly to demonstrate our adherence to compliance standards and to ensure that we are fulfilling our responsibilities in managing self-exclusion.

12.2 Handling of Self-Exclusion and Age Restriction Breaches

If a self-excluded individual or minor is found to have gained access to gambling activities, we are committed to taking immediate and effective action to rectify the situation and prevent future occurrences. The following steps will be implemented:

1. We will refund all deposited amounts to the player within two business days, except for any funds that are frozen due to Anti-Money Laundering policies. This ensures that the player does not face any financial loss as a result of the breach, while we ensure full compliance with the necessary regulatory procedures.

2. The player's account will be immediately blocked to prevent any further gambling activity. This action ensures that no additional gambling takes place, safeguarding both the player's well-being and the integrity of the gaming environment.
3. We will submit a detailed report to the Curaçao Gaming Authority within five working days. This report will provide a clear explanation of how the breach occurred, including any factors that contributed to the player gaining access to gambling, despite being self-excluded or underage. We will also outline the corrective actions being implemented to prevent such incidents from happening in the future, ensuring that our platform remains in full compliance with regulatory requirements.

Version control

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