

Luckywayz Limited B.V.

Responsible Gaming Policy

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1. STATEMENT, DEFINITIONS

At Luckywayz Limited B.V., we are committed to fostering a safe, transparent, and fair gaming environment. In line with the requirements of the Curaçao Gaming Authority (CGA), we have developed and implemented a comprehensive Responsible Gaming Policy aimed at protecting our players and promoting healthy gaming behaviour.

We understand the importance of ensuring that gambling remains an enjoyable form of entertainment — not a source of harm. That's why we have integrated Responsible Gaming principles into every aspect of our operations. Our internal procedures, player tools, and staff training are designed to help identify and prevent problematic gambling behaviour.

This policy has been developed with our target markets and player base in mind and is published in accordance with CGA regulatory requirements. It shall be available on our website and submitted to the CGA through the Licensee Portal for review and ongoing compliance.

This Responsible Gaming Policy outlines the fundamental terms and principles that guide our operations and player interactions to ensure that gaming remains a form of entertainment and not a source of harm.

To support clarity and consistency in our Responsible Gaming Policy, the following definitions apply:

Games of Chance - any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value. The outcome is determined either entirely by chance or by a combination of chance and player skill, where the player cannot significantly influence the outcome. This includes games such as poker, sports betting, slot machines, and other casino games.

LOK - the National Ordinance on Games of Chance ("LOK") is the regulatory framework governing licensed gaming operations in Curaçao.

Marketing, Promotion, and Advertising - this includes all communication materials and media that promote Luckywayz Limited B.V.'s domains, brands, products, or services. It encompasses traditional advertising, content marketing, digital campaigns, affiliate marketing, and all social media promotions.

Mandatory Requirements - these refer to the minimum elements that must be implemented in a Responsible Gaming Policy, as required by the CGA. These elements are designed to reflect the specific characteristics of the operator's target markets and player demographics.

Operator and/or we - Luckywayz Limited B.V., as the holder of a B2C gaming license issued by the Curaçao Gaming Authority (or a holder of the Orange Digital Seal "Certificate of Operations"), is classified as an operator under this policy.

Self-Exclusion - a process by which a player voluntarily excludes themselves from participating in online gambling activities across one or more product verticals. Self-exclusion is implemented immediately and applies to all domains and brands operated by the same license holder.

Vulnerable Person - as defined in Clause 1.1(h) of the LOK, a vulnerable person is any individual who meets one or more of the following criteria:

- Is under the age of 18;
- Is unable to control their gambling behaviour and is, or may become, addicted to Games of Chance, resulting in potential harm to themselves or others;
- Has been banned from participating in gambling either voluntarily or compulsorily;
- Has been declared bankrupt.

2. SCOPE AND PURPOSE

This policy applies to all operations conducted under Luckywayz Limited B.V.'s B2C license issued by the CGA. It outlines the standards and requirements relating to the protection of players, implementation of responsible gambling tools, marketing practices, and intervention mechanisms designed to reduce the risk of gambling-related harm.

Responsible Gaming & Gambling Addiction

At Luckywayz Limited B.V., we are committed to promoting responsible gaming and ensuring that our platform remains a safe and enjoyable environment for all players. While gambling can be an entertaining activity, we acknowledge that it may also lead to addiction for some individuals.

Understanding Gambling Addiction

Gambling addiction, also known as compulsive gambling or gambling disorder, is characterized by the inability to control gambling behavior despite negative consequences. This condition can impact an individual's financial situation, relationships, and mental well-being. Common signs of gambling addiction include:

- Difficulty in controlling gambling habits
- Chasing losses and betting more than intended
- Lying to family and friends about gambling activities
- Borrowing money to gamble or facing financial difficulties due to gambling
- Neglecting responsibilities at work, school, or home

3. KEY ELEMENTS OF RESPONSIBLE GAMING POLICY

3.1. Age Verification

At Luckywayz Limited B.V., ensuring that no minors access our services is a fundamental priority. We implement strict age verification procedures during the account registration process to ensure that only individuals who are at least 18 years of age (or 21+, where jurisdictionally required) are permitted to participate in any gaming activities.

As part of our Customer Due Diligence (CDD) procedures, we require all new players to provide the following details upon registration:

- Full name
- Date of birth
- Country of residence

- Permanent residential address
- Identity number
- Passport / ID-card / Driver's licence
- Nationality

We then verify this information using automated screening tools (e.g. SEON Identity Verification Service) and require customers to submit valid, government-issued photo identification such as a driver's license, ID card, or passport. In addition, customers must provide proof of address not older than three months (e.g. utility bill, bank statement, or official government correspondence).

Verification procedures are triggered at specific thresholds, including when a player deposits \$2,250 or when the player requests a withdrawal, regardless of deposit history. Verification may include document checks, selfie verification, or phone/email communication to further validate identity.

In accordance with our AML and Responsible Gaming policies, players who cannot adequately verify their age or identity will be restricted from:

- Depositing additional funds
- Withdrawing funds
- Accessing certain parts of the platform

If the required documents are not provided within 30 days from the point of triggering, the account will be closed and funds returned to the original source unless a presumption of money laundering or terrorist financing exists. In such a case, funds may be frozen and the case reported to the Financial Intelligence Unit (FIU).

However, if the operator has any doubt whatsoever of a player's age before KYC or AML milestones are reached, age verification should be undertaken at that point.

We maintain records of all age verification attempts and their outcomes. These records must be made available for regulatory review.

Our commitment to a safe, compliant, and socially responsible gaming environment starts with robust age verification as the first line of defense.

3.2. Information Accessibility

Our aim is to provide and constantly maintain clear and accessible information about responsible gambling tools (including self-exclusion cooling-off period, personal limits), problem gambling signs, and support resources on our homepage, footer and this policy. All such materials shall be available in English and relevant market languages.

3.3. Self-Assessment

To provide and secure self-assessment functionality for players, we implement an opportunity for players to access a detailed record of their betting and wagering history, including timestamps of transactions from their player account from the date the account was opened.

Additionally, we will secure an opportunity for users to regularly take a test from Gamblers Anonymous, featuring a 20-question quiz on its website: <https://gamblersanonymous.org/20-questions/> or suggest to them a CAGE Questionnaire (Adapted for Gambling) to check and discover possible gambling addiction.

3.4. Behaviour Tracking

Our active monitoring detects signs of problematic gambling. By analyzing deposit activity, betting patterns, session durations, and player interactions, we can identify at-risk individuals and take proactive steps to prevent gambling-related harm.

Behavior tracking is typically conducted by frontline staff (such as customer service representatives or VIP managers), as they are in the best position to identify problematic behavior through patterns and direct interactions.

These are the Key User-Behaviour Monitoring Factors

- Deposit and wagering frequency – Sudden increases or erratic deposit, wagering, or gaming session patterns
- Use of multiple payment methods – particularly attempts to bypass limits
- Reversing withdrawals – Players canceling withdrawal requests multiple times
- Extended play sessions – Prolonged gaming without breaks
- Increased communication with customer support, including requests for bonuses or signs of agitation
- Frequent changes to responsible gaming tools – Such as continuously increasing deposit or loss limits or repeatedly using cooling-off periods
- Players under 25 years old spending substantial amounts – Particularly on casino or virtual games
- Players maxing out a credit card and attempting to register additional cards
- Unrealistic spending patterns that do not align with the player's demographic profile
- Attempts to open multiple accounts – to bypass deposit or loss limits

Procedures for Player Identification and Intervention

The measures we take for responding to identified problem gambling behavior:

Player Profiling and Risk Assessment

- We establish player profiles with relevant data points to assess individual risk levels
- Behavioral risk factors are continuously monitored with real-time alerts for concerning activity

Direct Player Interaction

- When concerning behavior is identified, we initiate direct contact with the player
- Gathered information about interactions shall be constantly documented within our Player Account Management System, including indicators of concern and actions taken

Responsible Gaming Interventions

Players exhibiting at-risk behavior must be informed about responsible gaming tools, including deposit limits, time-outs, and self-exclusion. We are leaving the following options that may be applied to users depending on the risk level:

- Deposit limits to the player's account
- Temporary suspension of the access pending further review
- Excluding the player in cases of extreme risk

Training and Staff Readiness

We train customer service and responsible gaming staff to handle player interactions professionally and effectively by training them to:

- Recognize signs of gambling distress (e.g., agitation, aggression, or financial desperation)
- Conduct sensitive and structured conversations with at-risk players
- Direct players to appropriate support resources and responsible gaming tools
- Ensure all interactions are documented for compliance and follow-up actions

Escalation

Any problematic behavior identified is meant and shall be escalated to Luckywayz Limited B.V. Compliance Officer. That person is responsible for assessing each case and determining whether further restrictions, exclusions, or responsible gaming interventions are necessary.

3.5. Cooling-off, Self-Exclusion

At Luckywayz Limited B.V., we recognize that some players may need a break from gambling to regain control over their behavior. To support player wellbeing and prevent gambling-related harm, we offer both cooling-off periods and self-exclusion options, in line with Curaçao Gaming Authority (CGA) requirements and our internal Responsible Gaming Policy.

Cooling-Off Periods

Players may voluntarily activate a short-term cooling-off period through their account interface or by contacting customer support (at later stages only via interface while technical solutions are being implemented). The available durations for a cooling-off period include:

- 24 hours
- 7 days
- 1 month
- 3 month

Once a cooling-off period is requested, it is applied immediately and is irreversible for the selected timeframe. During this period:

- The player will be logged out of all accounts and prevented from logging in
- No deposits, wagers can be made
- Marketing communications shall be suspended

Self-Exclusion

For players seeking a longer break from gambling, we provide self-exclusion options that range from:

- 1 year
- 3 years
- 5 years
- 10 years
- Indefinite (lifetime exclusion)

Self-exclusion can be initiated directly via the player account, via safer gambling interactions, or through customer service (at later stages only via interface while technical solutions are being implemented). Once in effect, self-exclusion measures are:

- Immediately enforced and cannot be reversed before the selected duration ends
- Comprehensive, applying across all domains, brands, and platforms operated under the same license and customer account
- Ban on all marketing communications, including promotional emails, SMS, and account offers

All self-exclusion requests are also verified against internal and third-party self-exclusion lists to prevent duplicate registrations or reactivation attempts under different identities. In addition, we may proactively suggest or apply self-exclusion in severe cases of identified gambling harm, particularly where customer interactions or behavioral patterns indicate risk to player's well-being.

Post-Exclusion Procedures

Following the expiry of a time-limited self-exclusion, account reactivation is not automatic. Players must confirm in writing that they wish to return to the platform. Where the exclusion was initiated due to concerns of gambling harm, the player may be required to complete a Safer Gambling Questionnaire and/or provide evidence of financial stability before access is restored.

These protections are reinforced by our monitoring systems, Responsible Gaming staff to ensure that players who self-exclude or exhibit signs of distress are identified, protected, and supported.

Cooling-off periods, self-exclusion may be selected by the player by any combination of one, more or all of the product verticals offered by the operator (for example Slots, Table Games, Fixed Odds Betting, Poker and other P2P games).

Compliance and Regulatory Obligations

If a self-excluded individual or minor is found to have accessed gambling beyond their self-exclusion choices, the operator must:

- Refund all deposited amounts (except any funds frozen in accordance with the AML policy) to the player within two business days
- Immediately block the player's account to prevent further play
- Submit a detailed report to the CGA within five working days, outlining how the issue occurred and what actions are being taken to prevent recurrence

Operator-Initiated Exclusion

We may exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behavior
- The player attempts or engages in criminal activities through the operator's platform
- Initiated exclusions by us must be formally documented, and records must be kept for at least five years. The CGA may request these records at any time

3.6. Deposit and Other Gambling Limits

At Luckywayz Limited B.V., we empower players to maintain control over their gambling activities by offering a suite of customizable limit-setting tools. These tools are central to our Responsible Gaming Policy and help ensure that gambling remains a form of entertainment rather than a source of harm.

Deposit Limits

Players shall have the ability to set deposit limits that cap the total amount they may deposit over a specified time frame—daily, weekly, or monthly. These limits are available through the player's account dashboard and can be adjusted at any time.

Key features of deposit limits include:

- Limits may be set at the point of registration or at any time thereafter
- When a deposit limit is reached, no additional deposits will be accepted until the relevant period resets
- Any reduction in a deposit limit takes immediate effect, reinforcing the player's commitment to responsible play
- Any increase in a deposit limit is subject to a mandatory seven-day cooling-off period before it takes effect. This ensures that such decisions are made with due consideration and are not influenced by impulsive behaviour

Other Limits

In line with our target player demographics and market-specific requirements, players may also be provided with the option to set additional voluntary limits, including:

- Loss limits – limiting the amount a player is willing to lose over a set period
- Session time limits – restricting the duration of time a player can remain logged in or active
- Wagering limits – capping the total amount wagered during a specified timeframe

All limit-setting tools shall be clearly presented and explained in the player account interface, and supported by ongoing communication from our Support team.

Exceptions and Special Cases

In rare cases, applying a limit or exclusion may interfere with active wagers or gameplay. Examples include:

- A time limit set during an active poker tournament

- A deposit or exclusion limit is triggered while a player has an unresolved ante-post bet or a pending wager on a future event.

In such scenarios, the set limit or exclusion shall take full effect immediately after the tournament or event concludes. This ensures fair play and contract completion, while honouring the player's requested limits without delay.

Our platform shall ensure that all requested limits and changes are logged, timestamped, and enforced through automated system controls, with oversight from our compliance and Support teams. These measures reinforce our ongoing commitment to safe, responsible, and transparent gaming.

3.7. Reality Checks

In addition to other responsible gaming measures, we implement Reality check measures that include, but are not limited to:

A real-time session timer that remains visible at all times while the player is logged in.

Player-Activated Reality Checks. Players may have the option to set customized reality check alerts at specific time intervals. When triggered, it requires the player to confirm that they have read the message before resuming play and offers the option to end the session or continue playing.

Customised Reality Checks must suspend play momentarily and require the player to confirm they have read the message before resuming play.

Custom messages may include:

- Clearly indicating how long the player has been playing
- Displaying the player's winnings and losses during that period

3.8. Training of Employees, Affiliates, Marketing Partners, and Social Media Influencers

At Luckywayz Limited B.V., all employees involved in customer interactions and compliance play a vital role in the identification and management of gambling-related harm. To ensure readiness, the company shall maintain a structured training and escalation framework as part of its Responsible Gaming obligations.

Training and Support Team Readiness

All relevant personnel, including the Support Team, customer service agents, and compliance staff, shall receive Responsible Gaming training upon onboarding and at regular intervals thereafter. Training content shall be aligned with the requirements of the Curaçao Gaming Authority (CGA) and adapted to reflect real-world player interactions and risks.

Each training cycle shall include, at a minimum, the following components:

- **Recognising indicators of gambling-related harm**, such as:
 - Frequent reversal of withdrawals
 - Disproportionate or erratic deposit patterns

- Extended session durations or night-time play
- Player comments indicating financial hardship, emotional distress, or compulsive behaviour
- **Conducting structured and empathetic conversations** with players exhibiting risk indicators. Team members shall be trained on appropriate language, tone, and procedures for interacting with at-risk individuals.
- **Referring players to internal Responsible Gaming tools and external support services**, including but not limited to deposit limits, cooling-off periods, self-exclusion, and organisations such as GamCare or Gamblers Anonymous etc.
- **Documenting interactions and observations** accurately within the player account, ensuring traceability and facilitating compliance oversight.

Training shall be delivered on a regular basis and shall be mandatory for all designated roles. Refresher sessions shall be provided in response to regulatory updates, observed deficiencies, or internal audit recommendations.

Escalation Procedures

Where problematic behaviour is observed, it shall be escalated in accordance with the internal escalation protocol:

- Any team member who identifies signs of gambling harm or receives concerning communication from a player shall escalate the case to the Compliance Officer. The Compliance Officer shall assess the player's behaviour, account history, previous interventions, and risk level to determine whether further action is necessary.
- Based on this assessment, one or more of the following interventions shall be implemented:
 - Direct contact with the player and issuance of risk warnings
 - Imposition of deposit, time, or loss limits
 - Enforcement of a cooling-off period or self-exclusion
 - Filing of a Suspicious Activity Report (SAR) if required under AML/CTF regulations
 - Referral to external support services

All escalated cases shall be reviewed, recorded, and monitored to ensure timely and proportionate action. The company shall conduct periodic reviews of escalation outcomes to assess the effectiveness of interventions and identify any procedural gaps.

Through this framework, Luckywayz Limited B.V. shall ensure that its Support Team remains competent, confident, and equipped to uphold the highest standards of player protection.

3.9. Responsible Marketing and Advertising Standards

Luckywayz Limited B.V. shall maintain a strong commitment to ensuring that all marketing, promotional, and advertising activities are consistent with the principles of Responsible Gaming and compliant with the standards set by the Curaçao Gaming Authority (CGA) and applicable advertising laws.

General Marketing Conduct

The operator shall ensure that:

- All marketing and promotional materials shall be socially responsible, truthful, and not misleading;
- Direct marketing activities, including but not limited to emails, SMS, push notifications, or the issuance of bonuses and incentives, shall be strictly prohibited during any active cooling-off period or self-exclusion status
- Marketing communications shall not target individuals identified as self-excluded, underage, at-risk, or otherwise vulnerable, including those facing financial hardship or displaying signs of gambling harm
- Advertising content shall not portray gambling as:
 - A solution to financial problems or a path to financial success;
 - An escape from personal, emotional, or mental health difficulties (e.g. loneliness, stress, depression);
 - A mark of personal or social success, attractiveness, or enhanced lifestyle;
- Promotional messaging shall not suggest that skill or knowledge can influence outcomes in games of chance.

Marketing Restrictions and Creative Guidelines

The following standards shall apply across all forms of advertising:

- No aggressive or misleading tactics;
- No cartoon, animation, or visual design that appeals to minors;
- No use of influencers, celebrities, or entertainers with appeal to individuals under 18;
- No depictions of minors, either directly or indirectly, in any promotional content;
- No sexually explicit or provocative content;
- No associations with harmful behaviours such as smoking, drug use, alcohol consumption, or criminality.

All bonus offers and promotions shall be communicated transparently, with clear, accessible terms and conditions. Promotions shall not encourage excessive gambling through aggressive or deceptive tactics.

Affiliate and Partner Obligations

Luckywayz Limited B.V. shall ensure that all affiliates, influencers, VIP hosts, and marketing partners are fully aligned with the operator's Responsible Gaming standards. The operator shall:

- Enter into binding contractual agreements requiring all partners to adhere to Responsible Gaming principles;
- Conduct periodic compliance audits and impose sanctions for violations, including suspension or termination of the affiliate relationship;
- Ensure that influencers and marketing representatives are of legal age, do not appeal to vulnerable audiences, and refrain from any behaviour or content that contradicts responsible gaming standards.

Direct Marketing and Consent

The operator shall implement robust consent and opt-out mechanisms to ensure that:

- Players who have self-excluded or are under a cooling-off period shall be excluded from any and all direct marketing campaigns;
- All communications shall provide a clear and accessible method to opt-out from future marketing;
- Marketing databases shall be regularly reviewed and updated to reflect current self-exclusion and safer gambling statuses.

Online and Social Media Advertising

All digital marketing activities, including social media, shall be governed by strict age and content restrictions. Specifically:

- All gambling-related social media content shall be clearly identified as such and restricted to individuals over the legal gambling age;
- Operators shall use age-gating and audience targeting tools to prevent exposure to underage or vulnerable individuals;
- Online adverts shall include a clearly visible Responsible Gaming message, as required by CGA.

Sponsorships and Brand Placement

Sponsorship activities conducted by Luckywayz Limited B.V. or in its name shall comply with the following principles:

- Branding shall not appear on youth-focused materials or events;
- Sponsorships shall avoid associations with organisations or activities likely to attract minors;
- Responsible gambling messages shall be integrated into all sponsored content and materials.

3.10. Support and Resources

At Luckywayz Limited B.V., we understand that some players may require professional support beyond the tools and interventions we provide. As part of our commitment to Responsible Gaming, we ensure that players have easy access to trusted, independent support organisations.

Referral to External Support

We prominently display and maintain up-to-date links to internationally recognised gambling support services, including:

- GamCare (www.gamcare.org.uk) – offering confidential support, information, and counselling for problem gamblers in the UK and globally
- GambleAware (www.begambleaware.org) – providing advice, prevention tools, and access to treatment services
- Gamblers Anonymous (www.gamblersanonymous.org) – a fellowship of individuals who share experiences and support one another through recovery
- BeGambleAware – for 24/7 free and confidential help
- Gambling Therapy (www.gamblingtherapy.org) – offering multilingual support and resources to individuals affected by gambling addiction worldwide

Where applicable, we also list and refer users to local support organisations operating in the jurisdiction where the player resides.

Support Accessibility

These links shall be available across all platforms, including:

- The Responsible Gaming page of our website
- The footer of our homepage and login areas
- Emails and communication issued in the context of safer gambling or account limitations
- As part of our self-exclusion process, players are reminded of these external options for support

Our customer service and Responsible Gaming teams are trained to guide players towards appropriate support channels and, where necessary, assist in initiating contact with such services.

We believe that making external help readily accessible is a critical part of reducing gambling-related harm and ensuring that every player has the opportunity to access the support they need when they need it most.