

# Responsible Gaming Policy

## 1. Policy Statement

Zozo Technology B.V. (the “Company”) is committed to providing a safe, secure, and responsible gaming environment for all players in compliance with Curaçao Gaming Authority (CGA) regulations. The Company promotes fair play, prevents gambling-related harm, and ensures its products and services are not misused by vulnerable individuals.

## 2. Purpose

The purpose of this Responsible Gaming Policy is to define the Company’s framework to protect players, prevent underage and problem gambling, and provide tools for customers to manage their gaming activities. This policy integrates Curaçao regulatory requirements and incorporates best practices relevant to both fiat and crypto gaming environments.

## 3. Scope & Applicability

This policy applies to all Company employees, management, contractors, third-party suppliers, affiliates, and payment service providers involved in the Company's gaming operations.

## 4. Regulatory Framework

This policy is aligned with Curaçao Gaming Authority (CGA) requirements, international best practices, and responsible gaming standards applicable to online casinos and iGaming operators.

## 5. Objectives

The objectives of this policy are:

- Promote responsible participation in gaming activities
- Protect minors and vulnerable individuals from gambling harm
- Provide customers with tools to manage gaming behavior
- Ensure accurate and transparent information on gaming products
- Comply with Curaçao’s responsible gaming and player protection obligations

## 6. Player Protection Measures

To promote responsible gambling and protect players, the Company has implemented the following measures:

- Age & Identity Verification: Mandatory Know Your Customer (KYC) procedures at registration. The Company requires players to provide a valid government-issued identification document (passport, national ID card, or driver’s license)

prior to making their first withdrawal. Records of age verification processes and outcomes are retained and made available for regulatory review as required by the Curaçao Gaming Authority.

- Deposit & Loss Limits: Players can set daily, weekly, and monthly limits.
- Session Time Controls: Players receive reminders of play duration.
- Self-Exclusion Tools: Customers may request temporary or permanent exclusion.
- Reality Checks: Notifications of session duration and spending.
- Fairness Transparency: Clear disclosure of return-to-player (RTP) rates.
- Responsible Marketing: The Company does not engage in misleading promotions, aggressive targeting, or marketing practices that knowingly or deliberately target minors or vulnerable persons. Marketing and advertising materials will not portray gambling as a solution to financial or personal problems, and all campaigns will include a responsible gambling message.

## 7. Crypto-Specific Responsible Gaming Controls

Given the Company's acceptance of cryptocurrency payments, additional monitoring measures are applied:

- Risk-based transaction monitoring for wallets and on-chain activity.
- Deposit cooling-off periods for high-risk accounts.
- Enhanced screening for anonymous wallets and crypto mixers.
- Real-time limits for deposits and withdrawals linked to high-risk tokens.
- Integration with blockchain analytics providers to detect abnormal behavior.

## 8. Detecting & Assisting Problem Gambling

The Company monitors player activity to identify signs of problem gambling, including abnormal betting patterns, excessive deposits, or frequent credit card reversals. Upon detection, the Company may:

- Contact the player to discuss their activity
- Offer self-assessment tools
- Provide links to counseling and support services
- Suspend or limit player activity if necessary

## 9. Self-Exclusion & Player Support

Players may request temporary or permanent self-exclusion. Upon activation:

- Accounts are immediately suspended
- All pending bets are canceled
- Remaining balances are returned, subject to AML/CTF checks

Additionally, the Company partners with certified responsible gaming organizations to provide support resources.

## 10. Affiliate & Third-Party Compliance

The Company ensures that affiliates and third-party partners comply with Curaçao responsible gaming standards and implement consistent practices to protect players and uphold regulatory obligations.

## 11. Training & Awareness

All employees receive initial and annual training on responsible gaming, including:

- Detecting problem gambling behaviors
- Proper handling of self-exclusion requests
- Curaçao reporting obligations
- Crypto-specific gaming risk awareness

## 12. Information Accessibility

The Company ensures that responsible gaming information is prominently displayed and accessible to players:

- A dedicated Responsible Gaming Section (RG Section) is available in English and in the primary language(s) of the target market.
- A visible homepage link directs players to the RG Section at all times.
- The Terms & Conditions explicitly reference responsible gaming provisions and the tools available.
- The website footer contains the following mandatory elements:
  - A clear indication that underage gambling (under 18) is prohibited.
  - The Company's name, registered address, and CGA license number.
  - A statement confirming CGA regulatory oversight of the Company's operations.
  - The official CGA digital seal linking to the CGA verification portal.
  - A direct link to the RG Section.
  - Direct links to international gambling support organizations (e.g., GamCare, Gamblers Anonymous, GambleAware) and local support organizations where available.

## 13. Monitoring, Reporting & Auditing

The Company continuously reviews responsible gaming controls and reports incidents where required by Curaçao law. Annual audits are conducted to ensure compliance and improve player protection procedures.

## 14. Contact Information

For assistance regarding responsible gaming, please contact:

Emmanuel Kimani,  
Compliance officer  
Email: [legal@jb.com](mailto:legal@jb.com)