

DMG SOLUTIONS

B.V:

Responsible Gaming Policy

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*DMG Solutions B.V (The “**Company**”)*

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1. POLICY STATEMENT

As a holder of a remote gaming operating licence issued by the Curacao Gaming Authority (“**CGA**”) the Company is obliged to comply with all gambling laws, licence conditions and codes of practice issued by the CGA.

The Company is committed to embedding Responsible Gaming principles throughout all aspects of its operations. The objective is to ensure that gaming remains a form of entertainment and does not cause harm to players or others. The Company implements proactive measures and internal controls to identify, prevent, and mitigate problem gambling behaviour, with a particular focus on protecting Vulnerable Persons.

1.1 Revision History

Version	Issue Date	Next Review	Key Revisions
1.2	10/01/2024	-	Initial draft for licence application
1.3	01/06/2025	01/06/2026	Compliance with Curacao RG Policy v1 17 th April 2025

1.2 Approvals

Name	Title	Date	Sign
Laurence Alexander	Compliance Officer	10/01/2024	Laurence Alexander
Laurence Alexander	Compliance Officer	01/06/2025	Laurence Alexander

2. AGE VERIFICATION

According to Article 1.4(d) of the LOK, it is prohibited for the gambling licence holder to allow a minor the opportunity to participate in games of chance. The Company strictly prohibits the participation in gaming for persons under the age of eighteen (18).

All age verification procedures and measures adopted in accordance with these policies will be regularly reviewed and any reasonable improvements that may be made as technology advances and as information improves will be implemented as soon as possible.

The following measures are in place to deter and ultimately prevent underage gambling:

2.1 BLOCK ONLINE REGISTRATION

The online account registration form has been coded to open a message, upon the customer inputting their date of birth, which reminds new customers that they must be at least 18 years old in order to open an account on any of the Company’s websites.

All of the Company's websites are also coded to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of those sites.

2.2 AFFIRMATIVE CONFIRMATION

Upon completion of the online account registration form, a new customer is required to actively confirm, by ticking a checkbox, that: (i) they are of legal age to gamble; (ii) they accept the terms and conditions, and that (iii) they acknowledge that underage gambling is an offence.

2.3 18+ logo

The 18+ logo is displayed in the footer of every page of the Company's websites, whether the customer is logged in or logged out. This logo is also displayed on all commercial communications issued by the Company.

2.4 On-site policy

The Player Protection Policy is located under the "Responsible Gambling" link on each of the websites operating under the Company's licence. The section "*Are you an underage player?*" outlines the illegality of gambling as a minor but further offers advice for filtering systems and to seek parental advice on ceasing of the activity.

With the Internet so readily accessible via mobile devices and in homes around the world, responsible online gambling relies heavily on parental control and supervision. In order to ensure child safety on the internet, the Company's staff will, as appropriate, offer various tips for parents and encourage filtering systems.

2.5 KYC

Players are required to submit valid government-issued identification — such as a passport, national ID card, or driver's licence — once defined verification thresholds are reached, and in all cases prior to processing any first withdrawal.

These checks form part of the Company's mandatory due diligence process to ensure compliance with regulatory obligations and to prevent underage participation in gaming activities. The Company contracts with identity fraud solution providers to ensure documents are not tampered with or belong to other individuals.

2.6 Confirmed Minor

If the Company becomes aware, at any stage, that a registered player is a minor, the account will be closed without delay. In such cases, the Company will assess its civil obligations in accordance with applicable law. This may include refunding all deposits made by the minor and voiding or forfeiting any winnings. The player will be notified in writing of the account closure and the specific reason for this action.

The Company maintains a zero-tolerance policy toward underage gaming and implements strict preventive and reactive measures to ensure full compliance with this principle.

Further to the above the Company will take necessary measures such as additionally blacklisting the deposit methods used by a confirmed minor and introduce IP restrictions from devices used to complete the registration.

3. INFORMATION ACCESSIBILITY

At all times the Company ensures access to a distinct Responsible Gaming page available for players regardless of their account status. The Company also ensures transparency and provides additional information on the footer of the homepage and any associates applications.

3.1 RG INFORMATION PAGE

The RG information page is clearly visible and accessible from navigating on the website and displays help, guidance and information about how the player may contact the Company regarding any Responsible Gaming concerns via email or chat.

The page displays the following information:

- Written in clear, plain language to help players make informed and responsible choices.
- Designed to provide direct access to all available Responsible Gaming tools, including but not limited to self-exclusion, cooling-off periods, deposit limits, and other behavioural control options.
- Provides contact details through which players may reach the Responsible Gaming or Customer Support Team via email or live chat for assistance with Responsible Gaming matters.
- Provides links for dedicated help to one or more recognised gambling support organisations.
- Provides links for self-assessment tests.

3.2 WEBSITE FOOTER

The Company maintains full transparency and compliance across all public-facing gaming platforms. The footer of the homepage and any associated applications shall contain the following information:

- A clear and visible statement indicating that underage gambling is strictly prohibited.
- The full legal name and registered address of the Company.
- The official licence number issued by the Curaçao Gaming Authority (CGA).
- A statement confirming that the Company operates under the regulatory oversight of the CGA.
- A direct link to the Responsible Gaming section of the website.
- The official CGA digital seal displayed in accordance with the Authority's technical and design standards.
- A link to one or more recognised gambling support organisations such as GamCare, Gamblers Anonymous, or GambleAware. Where possible, local support resources relevant to the target market will also be listed.

3.3 TRANSACTION HISTORY

The Company ensures full transparency by allowing players to access a detailed record of their gaming and wagering activity directly from their account interface. Players may view at least the last six months of transaction history, including timestamps of all bets, deposits, and withdrawals.

Where a player requests records covering a longer period, such information will be provided by the Company within ten (10) working days, subject to applicable data-retention and privacy regulations.

3.4 SELF-ASSESSMENT

The Company encourages all players to periodically review their gaming habits to ensure that their gambling activity remains a source of entertainment and does not develop into problematic behaviour.

There is a link to an industry accepted and simple “self-assessment” process to determine at risk potential. There is a page on the website which compiles all controls mentioned herein and all additional information.

4. BEHAVIOUR TRACKING AND INTERVENTIONS

The licensing objectives and RG Policy include explicit reference to the protection of vulnerable persons from being harmed or exploited by gambling. There are various circumstances in which individuals may be significantly vulnerable or impaired, whether temporarily or permanently. The Company and its staff have a responsibility to ensure that such people are not harmed or exploited by their participation in gambling.

4.1 DETECTION

Examples of vulnerable people, who may be susceptible to harm or exploitation by gambling, include:

- Persons suffering from depression, mental illness or other impaired judgement;
- Persons under the influence of alcohol or drugs;
- Persons recovering from any sort of addiction; and
- Persons who have recently experienced life-changing or other tragic events, such as the death of a family member or the end of a marriage.

It can often be challenging for the Company’s staff to identify such vulnerable persons, particularly if they participate in gambling with little or minimal contact with The Company staff.

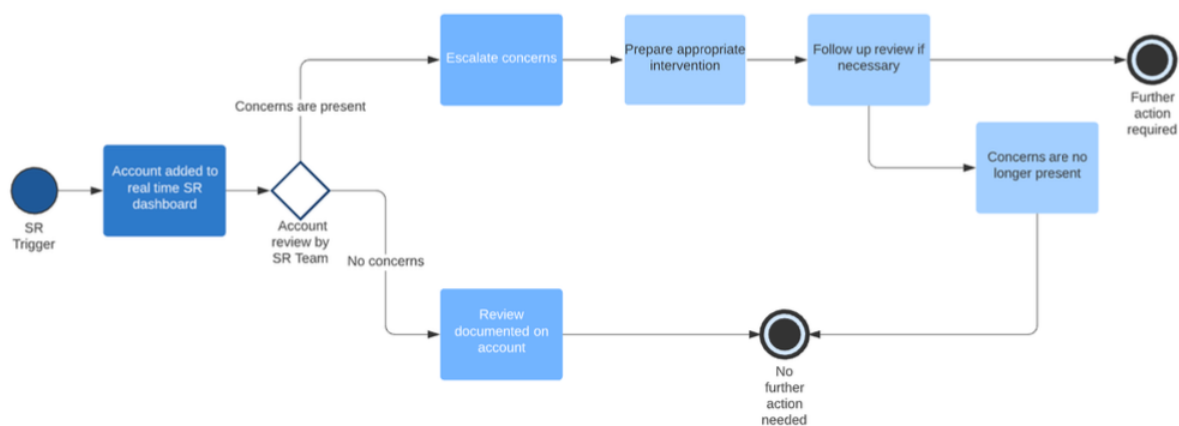
Even in cases where the Company initiates communication with a vulnerable customer via LiveChat or telephone, it may be very difficult to identify any indications that a person is in a vulnerable condition. On the other hand, a vulnerable person may gamble as a form of escapism, or without understanding the consequences of his actions.

The Company therefore expects its employees and any contracted third parties to always be aware of and look out for indications that a customer may be impaired or in a vulnerable condition. If a staff member or contractor believes that a customer is in an impaired or vulnerable state, they must immediately escalate the concern to the Responsible Gaming Team.

Examples of behaviours which may be indicative that a customer may be impaired or vulnerable, include:

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- A pattern of Inexplicable extended play sessions.
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing deposit or limits or repeatedly making use of cooling-off period.
- Players maxing out a credit card.
- Attempts to open multiple accounts to bypass deposit limits.
- Nervousness: customer communicates unusual fear or suspiciousness of others or a strong nervous feeling;
- Extended night-time game play: research indicates that the highest risk customers were much more likely to gamble overnight than non-problem gamblers.

The Company operates a suite of social responsibility alerts, which are intended to identify behaviour which may be indicative of problem gambling. Any alert triggered is referred to the RG Team for manual review. Additionally the Company operates a suite of AML alerts, which are primarily intended to identify transactions which may be suspicious however these alerts can be dual purpose in nature and be referred to the RG Team for review.



4.2 ESCALATIONS FROM CUSTOMER FACING STAFF

Customer Service must also take with all seriousness any indications of problem gambling which arise during interactions with customers, any concerning comments will be escalated to the Responsible Gaming Team. Agents are encouraged to escalate all concerns; however small they may be to ensure that the RG Team can investigate in greater depth. Training is ongoing with support staff and is provided by a 3rd party accredited provider.

4.3 MONITORING AND INTERVENTION

When a case of suspected problem gambling is raised, we pay special care and each individual is treated on a case by case basis, with no specific rigid guidelines on what would indicate problem gambling, a holistic review is always undertaken. We would first analyse the case and decide whether we can accommodate this individual. If indeed we note some concerning signs yet the customer wishes to continue gambling, based on our monitoring process we would assess whether we have adequate safeguards to allow this individual to continue gambling, whether that's through ongoing supervision or responsible gambling tools.

The Company will interact with the customer when it is concerned that the customer may be at risk. Where such risk is identified, the Company will take immediate measures to ensure the risk is reduced and the customer does not deteriorate further. Mitigating the risk is the immediate aim, the customer's risk to the business would be secondary and the primary concern is for the customer, we would therefore not hesitate to freeze accounts proactively whilst an intervention is pending.

Customer interaction is comprised of 3 parts:

1. **Observation** - certain behaviour has been identified in a) proactive report or b) system trigger or c) concerning comment(s) to our customer support
2. **Action**- After an observation/account review the RG Team would then issue provide an action intended to remedy the problem behaviour or provide an outreach
3. **Outcome**- we would then monitor the customer and we would look to see for an improvement in the customers behaviour/communication or a response to our outreach.

The action taken will depend on what was observed and the intended outcome. Thus, the type of interaction shall be based on the extent of the potential harm, ranging from an automated response to human contact.

Directing to help centres/limits – This should be used where mild suspicion of problem gambling tendencies preside however the customer appears and confirms to be in control, we may be limited to use this tool due to mitigated concerns.

Forcing a deposit/session limit on the customer – This should be used when we have concerns that the customer is playing above his means and where we have already proposed limits in the past. This is effective to ensure the customer does not burn himself out, especially if we can see he has tendencies to lose control on rare occasions.

Forcing a break on the customer – This is to be used when we have already interacted with the customer but we still have very strong suspicions that the customer is a problem gambler and the customer would be in a denial should phase. This can be for a period of 7 days, 3 or 6 months and would act in essence as a forced exclusion.

Freezing an account – This action is taken when we have immediate concerns for a player whereby we can see a clear trend of problem gambling or alternatively we have contacted the customer with questions but received no reply. We would then use this action to force a reply from the customer.

Requesting source of funds – This is an Anti-money Laundering Tool however there may be incidents where there are joint concerns between the Responsible Gaming Team and the AML Team. Therefore this tool should be used in tandem to address overlapping concerns, which for RG purposes would

address affordability. Should the average spend be vastly disproportionate to the customers income we can then proceed to apply a deposit limit in line with the customers income.

Designating a risk level – This is to be implemented on a more systematic scale to ensure universal assessment of the customer base. In its initial instance it would be used to identify ‘high risk’ customers, this would solely be reserved for responsible gaming assessments and having this tag attached to a customer would revoke their bonuses and promotions. This is to ensure that we are not enticing customers where we are concerned that they are not gambling responsibly.

Permanent closure – This is to be reserved for cases where we have very serious concerns regarding the customers state of mind and overall reliance on gambling, this tool is not to be used in the early stages and should only be used as a last resort. We may be limiting our exposure by having a permanent closure at an early stage.

If the Company establishes that the customer is showing clear problem gambling tendencies but is not admitting of these problems then the Company also reserves the right to impose a self-exclusion unilaterally. The Company will suspend direct marketing to customers who show behaviours which may be indicative of problem gambling pending interaction, where the interaction is not immediately possible.

The Company may also conduct a self-assessment questionnaire with the customer, in order to encourage the customer to think about their gambling behaviours. The customer’s responses, together with the data held by the operator, can help the operator to understand what kind of help and support to offer.

In cases where individuals are requesting refunds, we pay special care in these instances and we apply our reviews with an ethical overture. The Company understands that customers who have gambled and lost their money may unfortunately take advantage of these measures intended to protect vulnerable individuals and we therefore assess each case on an individual basis based on merits of the case.

The Company appreciates that although we apply various protective measures, we are not able to always “catch” customers who may be suffering from a disability or vulnerability which would affect their judgment including a relapse. As a socially responsible operator we will consider refunds where we feel the individual did not have full capacity at the time or may have been going through undue stress or alternatively where our systems failed to pick up problem gambling signs which should have been caught prior to the customer’s communication with us.

5. COOL-OFF

The Company allows players to take temporary breaks from gaming activity through a voluntary cooling-off option. This feature supports responsible gambling and provides players with time to regain control over their gaming behaviour. The Company will not question the player’s decision, offer bonuses or promotions to continue playing or delay or complicate the activation process.

5.1 TIMING

A cooling-off period may be activated at any time from within the player account or by contacting Customer Support. The request takes effect immediately upon confirmation.

5.2 DURATION

Players may select a cooling-off period of 24 hours, 7 days, 30 days or 3 months. During this time, the account remains inactive for gaming purposes.

5.3 STATUS DURING COOL-OFF

While under cooling-off status, the account is active however the player is restricted from making a deposit, or place wagers. Withdrawals of existing balances remain permitted.

5.4 MARKETING

During the cooling-off period, the player is excluded from all marketing and promotional communications.

5.5 REACTIVATION OPTIONS

The account automatically reactivates once the selected period expires. Reactivation before the end of the period is not permitted. No further action is required by the player.

6. SELF-EXCLUSION

The Company provides a fully automated self-exclusion facility enabling players to restrict access to their gaming account online, without the need for email correspondence or manual approval. The process is designed to protect players wishing to permanently or temporarily stop gambling.

6.1 TIMING

Once a self-exclusion request is confirmed, the restriction takes effect immediately. Any wagers placed after the request but before activation will be voided, and associated funds returned to the player.

6.2 DURATION

Players may choose a self-exclusion period of:

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime.

6.3 STATUS DURING EXCLUSION

During self-exclusion, the player's account is closed, and login access is blocked. Duplicate-account detection measures are employed to prevent new registrations by excluded players. Any unsettled ante-post bets are voided and refunded, subject to AML/CFT obligations. In-progress tournaments may be completed, but excluded players cannot participate in progressive jackpots after exclusion takes effect. All available funds are remitted to the player subject to AML/CFT obligations.

6.4 MARKETING

No marketing, promotional, or advertising material is sent to self-excluded players.

6.5 REACTIVATION OPTIONS

After the self-exclusion period expires, reactivation requires a written request from the player via official support channels (chat or email). The account remains blocked until such confirmation is received. Self-exclusion cannot be lifted early. The Company maintains records of all exclusions and, where possible, blocks payment methods previously used by excluded players during the exclusion period to prevent circumvention.

6.6 OPERATOR-INITIATED EXCLUSION

The Company may independently initiate exclusion when a player exhibits signs of problem gambling in line with Section 4 of this Policy, or engages in criminal activity through the platform. Such actions are documented and retained for a minimum of five years.

6.7 CROSS-BRAND EXCLUSION

Where a player chooses to exclude under this framework, the exclusion applies to all gaming brands operating under the same licence. The Company ensures that such requests are implemented across all associated domains and that player data is synchronised to prevent access to any related gaming sites. Players are clearly informed when an exclusion applies licence-wide, and all linked accounts are closed in accordance with the exclusion parameters.

7. LIMITS

The Company provides players with a full range of tools to manage and control their gambling activity responsibly. Players may set deposit limits on a daily, weekly, or monthly basis, allowing them to establish personal spending boundaries consistent with their individual gaming habits. Limits can be adjusted at any time; however, any request to increase or remove an existing limit takes effect only after a cooling-off period, while reductions apply immediately.

7.1 DEPOSIT LIMITS

The Company enables players to set limits on the total amount they may deposit over a defined period — daily, weekly, or monthly — to promote responsible play and financial control. Once a deposit limit is reached, the player will be unable to deposit further funds until the relevant period resets. Certain active wagers may be impacted by the application of a limit or exclusion. Players may set or modify their limits directly within their account settings. Customer Support is available to assist or clarify the process upon request.

If a player chooses to adjust an existing limit:

- Requests to make a limit more restrictive take effect immediately.
- Requests to make a limit less restrictive are subject to a mandatory 24-hour cooling-off period before activation.

8. STAFF TRAINING

The Company ensures that all Customer Support and Responsible Gaming personnel receive dedicated training to manage player interactions with professionalism and care.

Training programmes cover, at a minimum:

- Identifying signs of gambling-related distress, such as agitation, frustration, or financial hardship.
- Conducting structured and empathetic conversations with at-risk players.
- Providing clear guidance and referrals to Responsible Gaming tools and recognised support organisations.

Training is delivered on induction and refreshed periodically to maintain staff competence and awareness of current Responsible Gaming standards.

9. MARKETING

The Company is committed to advertise and promote its services in a responsible manner, with particular focus on ensuring the protection of minors and other vulnerable persons from harm or exploitation. The Company following the guidance issued by the CGA adhered to the following principles to ensure it does 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

- Bonuses and promotions must be communicated transparently with clear terms and conditions.
- Operators must not use bonuses to encourage excessive gambling.

Third Party Involvement

- The operator is 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.
- The operator 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.

