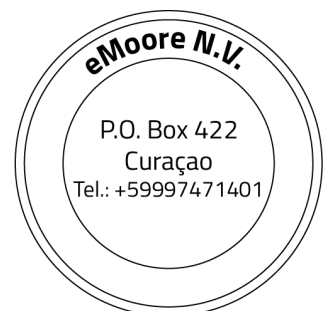


Responsible Gaming Policy

Cartwheel B.V

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DOCUMENT CONTROL

Version	Date	Description of Changes	Author
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1.2	20.03.2026	Policy update to further align with implementation schedule	Compliance

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Executive Summary

This Responsible Gaming Policy (herein referred to as the “Policy”) outlines Cartwheel B.V’s (herein referred to as the “Company”) framework for designing and implementing tools to assist players with maintaining control over their gaming.

Introduction

Cartwheel B.V operates the brand Betclown, a Curaçao-licensed entity under the Curaçao Gaming Authority (“CGA”). The Company is committed to upholding the highest standards of responsible gaming.

This Policy outlines the comprehensive measures, procedures, and criteria implemented by the Company to detect, identify, and address problem gambling among its players. The Company believes in a responsible attitude towards gambling and has implemented measures detailed within this document to promote and ensure responsible gambling. The Company believes that the industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for those Customers requiring assistance.

For the majority of people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. The Company acknowledges that for some people, gambling can have a negative impact on their life and therefore the Company has developed this Responsible Gaming Procedure (hereafter: the ‘Policy’) which outlines certain practices adopted by us when providing services to our customers.

These practices have been developed in strict accordance with the regulatory requirements and player protection standards established by the Curaçao Gaming Authority (CGA) under the applicable provisions of the National Ordinance on Games of Chance (LOK) and associated guidelines.

Responsible Gaming Role s Annual Report

Responsible Gaming involves the conduct of gambling in a manner where the potential for harm associated with gambling is reduced.

The Company respects the rights of our Customers to enjoy our services and to take responsibility for their own conduct but also acknowledges the duty to our customers to provide them with appropriate information that may assist them to manage their gambling. As a general principle no credit shall be offered to customers for the purpose of wagering.

Cartwheel B.V has appointed a dedicated individual responsible for implementing and overseeing the Company’s Responsible Gaming programme.

An internal Responsible Gaming Effectiveness Report is submitted to senior management annually. The report includes an overview of operational practices, interventions, player statistics, and recommended improvements. Any material changes to the policy are also reported to the CGA in accordance with regulatory requirements

The Responsible Gaming Policy for Licensed Operators as issued on April 17, 2025 by the Curacao Gaming Authority (hereafter: ‘RG Policy CGA’) sets out various obligations which must be adhered to. As part of the RG Policy CGA, the Company will prominently display:

- The license details through the dynamic seal on the page(s);
- A sign which indicates that under-age gaming is prohibited;

- A 'responsible gaming' message, explaining that gaming can be harmful if it is not controlled, and information about the player support measures;
- A direct link leading to the responsible gaming section which includes all relevant responsible gaming information required by the CGA;
- A direct link which enables players to refer to one or more gambling support organisations;

Information Visibility

The Company ensures that players can easily access responsible gaming information by:

- Visible Links: Our homepage displays a link to the responsible gaming policy, tools, and contacts. These links are also included in the footer of the homepage on our website
- Terms and Conditions: Clear references to our terms and conditions, including the prohibition of underage gambling, are provided. The terms and conditions are easily accessible and written in plain language;
- Responsible Gaming Organizations: Links to organizations that offer support for gambling addiction are available. These include local and international organizations, as per this policy.

All problem gambling material and content is available in English language only as well as the language of the target market(s). Procedures remain the same irrespective of language.

Responsible Gaming Tools

The Company is dedicated to promoting responsible gaming to ensure the welfare of all players. While the Company strives to provide an entertaining gaming experience, it acknowledges that gambling may become problematic for some individuals. As a result, the Company has designed and implemented tools to assist players to play responsibly within their limits.

Limit Setting

The Company provides players with the ability to manage their spending by setting deposit limits directly from their account profile. These limits are a key component of the Company's responsible gaming framework, in line with the player protection obligations established by the CGA.

Players can set daily, weekly, or monthly deposit limits to control how much money they are able to deposit over a given period. Once a deposit limit is reached, no further deposits will be accepted until the limit resets in accordance with the selected timeframe.

These controls are designed to promote responsible gaming and help players maintain control over their gambling activity.

Changing Limits

When a player sets a deposit limit, they may adjust it at any time by submitting a request. Changes can be made directly through the player's account profile or by contacting Customer Support.

Requests to decrease an existing limit will take effect immediately, while requests to increase a previously set limit will only take effect after a 24-hour cooling-off period.

Limit Restrictions

Any limits a player puts into place will be active on the brand they set them on, across all devices by which the Company provides its services to its players.

Self-Exclusions

Cooling-Off (Temporary Self-Exclusion)

The Company offers players the ability to take a short-term break from gambling through a Cooling-Off period, in line with the player protection provisions set out by the CGA under the National Ordinance on Games of Chance (LOK).

This measure is intended to give players time to reflect on their gambling behaviour and regain control before it becomes harmful.

Players can initiate a Cooling-Off period for a duration of:

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

During the selected Cooling-Off period:

- The player will be unable to place any wagers on the selected brand(s) or vertical(s).
- Deposits will be disabled.
- The player will retain access to their account for the purpose of withdrawing any remaining funds, but no gambling activity will be permitted.
- Players may opt out of marketing communications for the duration of the Cooling-Off period.

Activation and Implementation

The Cooling-Off period can be initiated directly from the player's account or by contacting Customer Support. Once selected, the chosen duration takes effect immediately.

Players must manually confirm their choices before the Cooling-Off period is

activated. During the Cooling-Off Period:

- If opted out by player, no bonuses or promotional offers may be sent or displayed to the player.
- The player must not be contacted or encouraged to resume gambling.

Reactivation

At the end of the selected period, the player's account is automatically reopened. No additional confirmation is required from the player.

Self-Exclusion

Self-exclusion is recognized by the gambling industry as a way for customers to control their gambling. The Company offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want our assistance to help them stop.

The self-exclusion request shall be applicable:

- A. To the domain the exclusion is request on.

- B. All advertisement activities of the Company. An automatic opt-out will be triggered when self-exclusion is activated.

Players may initiate a self-exclusion at any time. During this period, they will not be able to access their account, deposit funds, or participate in any gambling activity.

In line with regulatory requirements, the minimum duration for permanent self-exclusion is one year. The available duration options beyond this are determined by the Company and may be updated from time to time. The Customer shall be able to set duration for 1 year to a lifetime.

Once a self-exclusion is confirmed, it cannot be modified or reversed under any circumstance during the selected exclusion period.

Players can activate self-exclusion either directly from their account settings or by contacting the Customer Support team. Once this is set, all exclusions related to brands/domains, vertical gambling activities and advertisement activities automatically applies immediately.

Any wagering that takes place following the self-exclusion request and prior to it being into effect will be voided and the funds returned to the Customer.

The Company should not question a Customer's decision regarding self-exclusion in general, nor will the Company offer bonuses to the Customer to encourage participation, or delay/complicate the self-exclusion activation process.

At the conclusion of the exclusion period, reactivation of the player account will not occur automatically. The player must submit a written reactivation request via Customer Support channels. The Company will not initiate or encourage reactivation under any circumstances.

Reactivation may only proceed once the exclusion term has fully expired and will be subject to internal review. The Company reserves the right to deny reactivation if concerns remain regarding the player's welfare or responsible gaming behaviour.

Operator-Initiated Exclusion

In accordance with the Responsible Gaming framework set out by the Curaçao Gaming Authority (CGA), Cartwheel B.V may initiate player exclusion where there is reasonable concern that a player may be experiencing gambling-related harm, or where exclusion is warranted due to risk-related behaviours or violations.

This measure is considered a protective intervention and may be applied independently of any player request.

Circumstances Requiring Operator-Initiated Exclusion

Cartwheel B.V may enforce an exclusion in the following scenarios:

- Clear and consistent indicators of problem gambling behaviour
- Expressed emotional or mental distress, including references to self-harm
- Repeated attempts to bypass responsible gaming tools (e.g., creating multiple accounts)
- Use of gambling as a solution to financial problems or debt
- Use of funds known or suspected to be borrowed or unowned
- Attempts to commit fraud, money laundering, or abuse the platform

Implementation and Documentation

When a player is excluded:

- The account is suspended or permanently closed, depending on the severity of the case. The player can no longer log in.
- The player is notified of the exclusion and its rationale
- Any open bets or unresolved wagers including tournaments will be handled in accordance with applicable laws and CGA guidelines
- Ante-post bets will be voided and refunded subject to AML/CFT regulations
- Contributions to progressive jackpots that were made by the Customer through gameplay prior to the self-exclusion request remain, but the Customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect.
- No advertisement activities shall be conducted towards the Customer.
- Any payment method used by the Customer will be blocked by the Company for future use during the term of the self-exclusion period.

The Company will implement measures to prevent self-excluded Customers from creating new Customer's account under different credentials.

The Company will retain records of self-excluded requests by Customers according to the applicable record keeping requirements.

Player Reinstatement

Reinstatement of an operator-excluded account can only occur after a thorough internal review and is subject to the outcome of a responsible gaming risk reassessment. The Company reserves the right to refuse reinstatement where there is ongoing concern for player welfare. The reactivation of the account cannot be instigated by the Company by re-commencing communications with the Customer.

Procedures for Identification, Detection, and Actions

The Company does not allow anyone under 18 years of age to play on their website(s). Age verification is conducted in accordance with the AML guidelines of the CGA.

In the unlikely event that an underage Customer does manage to play, all deposits will be returned to the customer regardless of win or loss. The account will be closed immediately.

The Company will retain records of all age verification process and their outcomes according to the Company's record keeping obligations and for regulatory review by the CGA.

The Company has instituted meticulous procedures for the identification and detection of problem gamblers, ensuring a proactive and responsive approach.

Rigorous staff training programs are in place, emphasizing precise customer interaction procedures that align with responsible gaming practices.

Comprehensive procedures are outlined for staff to initiate player interaction, complemented by explicit examples of behaviours that warrant concern.

Detailed guidelines specify the circumstances necessitating player restriction or the refusal of service, accompanied by a comprehensive procedural framework for interacting with players displaying signs of problem gambling.

Processes to detect and identify problem gambling

The Company acknowledges its obligation under the Curaçao Gaming Authority (CGA) framework to detect and address problem gambling behaviours.

Current Measures Include:

- **Manual Monitoring of Player Behaviour**
Customer behaviour is reviewed manually by the Responsible Gaming and Compliance team. Indicators such as frequent deposits, prolonged gaming sessions, or repeated bonus requests may trigger a closer review.
- **Player Communication Oversight**
The Company monitors incoming customer queries and complaints for signs of distress, frustration, or erratic behaviour that may be linked to gambling-related harm.
- **Escalation Protocols**
Cases that raise concern are escalated internally for review and, where appropriate, further intervention steps are taken, such as temporary account restrictions or direct engagement with the player.
- **Staff Awareness and Ongoing Training**
Key staff involved in customer support and compliance are provided with periodic training to help them recognise signs of problem gambling and to follow internal escalation procedures.

Duplicate Accounts

The company will take measures in order to prevent Customers from opening duplicate accounts on the Website, which measures will be further detailed in version 1.3 in accordance to the implementation schedule of the Responsible Gaming policy CGA.

Criteria for Meeting Obligations

The Company applies a robust set of monitoring criteria in accordance with its obligations under the player protection provisions established by the Curaçao Gaming Authority (CGA) and the National Ordinance on Games of Chance (LOK). These measures are designed to identify problematic gambling behaviour and support timely intervention. The criteria include:

- a) Continuous monitoring of the volume and frequency of player deposits and wagers;
- b) Scrutiny of the use of multiple or unusual payment methods;
- c) Assessment of the frequency of reversed withdrawals, which may indicate impulsive or risky behaviour;
- d) Evaluation of behavioural indicators through communication patterns, such as an increase in player complaints or excessive bonus requests;
- e) Oversight of the activation and effectiveness of responsible gaming tools, including deposit limits and self-exclusion features.

Player Interaction

The policies and procedures relating to player interaction where the Customer Support team have concerns that a player's behavior may indicate problem gambling are as follows:

Employees who initiate interaction:

- **Trained RG/AML Agents:** These agents are responsible for reviewing flagged players and interacting with them based on identified risks.

Examples of behavior that raise concern:

- **Time and Spend Indicators:** Large deposits, increasing frequency of sessions, or escalating betting patterns.
- **Account Indicators:** Failed deposits, multiple payment methods, pre-loaded cards or e-wallets indicating possible gambling with unowned funds.
- **Use of Gambling Management Tools:** Frequent changes in deposit limits, use of self-exclusion, or repeated time-out requests.
- **Customer-Led Contact:** Complaints about losing, requests for bonuses after losses, or mentioning negative impacts of gambling.
- **Play Indicators:** Chasing losses, erratic betting patterns, or gambling on high-risk products.
- **Vulnerability Indicators:** Signs of physical/mental health issues, addiction, financial difficulty, or demographic risks.

Circumstances requiring a player to be barred or refused service:

- **Problem Gambling Indicators:** Players exhibiting signs of problem gambling or self-harm concerns may be refused service. Limits will be set, and higher-risk players may be excluded or self-excluded.

Additional factors that Customer Support agents are encouraged to consider include:

- **Number of Declined or Failed Deposits:** Frequent failed deposit attempts can indicate financial difficulties or attempts to gamble beyond one's means.
- **Late-Night Play and Increase in Late-Night Play:** Gambling late at night or an increase in such behavior can be a sign of problem gambling, as it may interfere with the player's daily life and responsibilities.
- **Player's Age:** Younger players may be more susceptible to problem gambling due to a lack of experience and financial stability.
- **Average Daily Stake:** A high average daily stake compared to the player's known financial situation can be a red flag.
- **Reinvesting 'Big Wins':** Players who immediately reinvest large winnings into further gambling may be chasing losses or unable to stop gambling.
- **Proximity of Deposit Attempts to Payday:** Depositing large amounts of money shortly after receiving income can indicate that the player is using essential funds for gambling.
- **Increase in the Number/Variety of Games Played:** A sudden increase in the variety or number of games played can indicate a loss of control.
- **Number of Deposits During Gaming Sessions:** Multiple deposits in a single gaming session can be a sign of chasing losses.
- **Customer Only Utilizes 'No-Deposit Bonuses' for Gameplay:** Relying solely on no-deposit bonuses can indicate that the player is trying to gamble without risking their own money, which may be a sign of financial difficulties.

Problem gamblers

Problem gambling occurs when there is a lack of control over gambling, particularly the scope and frequency of gambling and the amount of recreational time spent gambling.

The negative impacts may include:

- Extreme financial losses relative to their sources of income
- Adverse personal effect on the customer, his or her family and friends
- Adverse effect on employers and work performance

The Company's aim is to achieve equilibrium in the provision of gambling services, taking into account those Customers who enjoy our services and use them as a form of entertainment, the wellbeing of our Customers who have an acknowledged gambling problem, their families and the community at large

The Company executes precise actions concerning problem gamblers and those at risk, including:

- a) Identification of triggering actions necessitating staff intervention.
- b) Informing players of available responsible gaming tools and providing support for their effective usage.
- c) Imposing limits on players as prescribed by Section of the CGA's Responsible Gaming Policy for Licensed Operators.
- d) Excluding players in accordance with the player protection provisions established by the Curaçao Gaming Authority (CGA), ensuring the process is clearly documented and includes the rationale, actions taken, and supporting evidence.

This Policy is a testament to The Company's unwavering commitment to fostering a secure, transparent, and responsible gaming environment. Continuous updates, training, and collaboration with the CGA ensure the perpetuity and efficacy of this Policy. Players are encouraged to engage with our dedicated Customer Support team for personalized assistance with responsible gaming tools and resources.

Procedure for interaction with likely problem gamblers

- **Categorization:** Players are reviewed and categorized into three groups: Leisure Players (low risk), At-Risk Players (medium risk), and Problem Gamblers (high risk).
- **Actions:** For higher-risk players, actions may include offering self-exclusion, setting stricter limits, or excluding the player if necessary.
- **Help and Support:** If gambling becomes problematic, players are encouraged to take the Gamblers Anonymous Questionnaire and seek professional advice. Additionally, independent organizations such as Gambling Therapy and GamCare offer specialized support services. Our website will display the direct links to these organizations, as well as to specific names of organizations offering treatment options in case these are available in the target market of the Company. These links will be readily available on the footer of the website.

Actions that will be taken with respect to problem gamblers and players at risk

(a) Identification of player actions or behaviour triggering intervention:

Actions/Behaviors Triggering Intervention: Indicators like large deposits, erratic betting patterns, repeated gambling despite losses, and signs of emotional distress (e.g., mentions of self-harm or excessive frustration with gambling).

(b) Informing players about responsible gaming tools:

Tools to be Informed: If a player shows signs of problem gambling, the staff will inform them about available responsible gaming tools like setting limits, self-exclusion, or taking breaks.

(c) Imposing restrictions on the player:

Restrictions to be Imposed: Restrictions on deposits or gambling behavior are set when a player's actions indicate potential gambling problems.

(d) Excluding the player:

Exclusion Process: If the player's behavior continues to pose a risk (e.g., significant signs of gambling addiction or self-harm), exclusion may be implemented, potentially leading to permanent self-exclusion or temporary account suspension.

Self-Assessment and Player History Access

The Company encourages players to regularly assess their gambling behaviour to ensure it remains within healthy, sustainable limits. To support this, the following resources and tools are provided:

Self-Assessment Tools

Players are provided with access to a widely recognised self-assessment questionnaire via a direct link to the Gamblers Anonymous "20 Questions" self-test, available at:

<https://www.gamblersanonymous.org/ga/content/20-questions>

This confidential questionnaire is designed to help players evaluate whether their gambling may be causing harm. The Company recommends that players who answer "yes" to multiple questions consider using available responsible gaming tools, taking a break, or seeking further support. As well as to specific names of organizations offering treatment options in case these are available in the target market of the Company. These links will be readily available on the footer of the website.

Player History Access

Players may view a detailed summary of their gaming and transaction history via their account profile. This includes:

- Deposits and withdrawals
- Wagering activity
- Win/loss outcomes
- Timestamps of transactions

Players have access to their full account and transaction history, including lifetime activity, at any time via their account. Should a player require the information in a different format or encounter any issues accessing it, a request can be made to the Customer Support team. Requested records will be provided within 10 business days, subject to operational feasibility.

Records and Investigations

Thorough records are diligently maintained for all internal responsible gaming investigations conducted on players, including details of the analytical tools and behavior monitoring systems employed during these investigations.

Decisions derived from responsible gaming policies and procedures, including player interactions, are meticulously documented and available for the CGA.

Self-Harm Prevention

All self-harm and suicide cases must be dealt with the highest priority, whereby prevention is key. When a player expresses thoughts of self-harm or suicide while communicating with a Customer Support agent via any channel, the following actions must be taken:

- Remain engaged with the player on the call or chat and do your best to prevent them from disconnecting.
- Respond in a calm, empathetic, and non-judgmental manner, ensuring the player feels heard and supported
- Immediately escalate the situation internally by notifying a designated manager or senior agent.
- Document the interaction in detail, including:
 - Time and date of the communication
 - Exact statements made by the player
 - Actions taken during the conversation
 - Names of any internal personnel involved in the escalation

The relevant team will assess the situation and determine if further steps, such as a welfare check through available third-party support services or account restrictions, are necessary. The Company is committed to responding with care and seriousness in such circumstances.

Third-Party Providers

In cases where a game, payment, or any other provider correlating with the player, contacts us expressing their concern about a player's pattern or gaming behaviour, the Customer Support team are permitted to investigate and assess the player's profile.

Third Party responsibility

The Company shall make any contracted third-party aware of their Responsible Gaming Policy and require them to adhere to it.

The Company is accountable for materials provided to affiliates, representatives, sponsorship, ambassadors, social media influences, including wordings and visual representations, in case these influencers actions and/or statements pertain to paid placement of advertisements.

Any Customer who is currently under a period of self-exclusion (cooling off) or a permanent exclusion due to problem gambling, will be removed from all marketing correspondence lists. No marketing or promotional materials is to be sent to excluded Customers.

Underage Gambling

Any person who tries registering an account under the legal age of 18 will be denied access to Betcloud during the registration process. When attempting to enter the date of birth, players will be prompted a message that registering is prohibited once the age entered is below 18 years, and the system will not allow them to continue.

If it has been found that a minor has bypassed the registration process with false information, the net deposits made from the account will be returned and all bets/winnings will be cancelled/confiscated.

In addition to the mechanisms in place, the Company will educate and advise players to use parent control tools to prevent minors from using The Company's website.

Advertisement activities

The Company shall engage in responsible advertising. According to the LOK, The Company must ensure that its marketing and advertising activities, including the offering of bonuses:

- Do not encourage excessive gaming
- Are not misleading, thus e.g. do not portray gaming as an investment, misrepresent skills vs games of chance as mentioned in the CGA RG Policy.
- Do not target Vulnerable persons.

All advertisement done by the Company or third parties hired by the Company will include a clearly visible Responsible Gaming message or slogan.

Employees' Onboarding and Routine Training

The Company maintains a structured onboarding process and routine training procedures to guarantee that employees responsible for handling matters related to responsible gaming are adequately and consistently trained.

Staff members undergo training sessions to recognize signs of agitation, distress, intimidation, aggression, or any other behavior indicative of potential gambling-related issues.

Internal evaluation

The Company understands that evaluation of Customer interactions is important to understand the impact they have had and to help ensure customers are getting the right help and support.

The findings of the Customer interaction evaluations are to be reported to the management of the Company.

This policy and the Company's approach to customer interaction can then be amended using the findings from the evaluation.

Training

All employees will be given responsible gaming training at the start of their employment and refresher training periodically, which is mandatory for all personnel.

A document to record all employees who have taken the training will be kept along with the training measures.

The Company will train all employees including management and board members, and any staff hired from outside the Company. Where new policies and procedures are set out, training will be provided again.

As the Company will do its utmost to train and educate its employees, specific cases will need to be handled/ escalated to the Customer Support team leaders. The case will be escalated to the Compliance team if it cannot be resolved by the Customer Support team leaders.

Employees' Gambling

The Company's employees are only allowed to play on any of The Company's websites to learn and test the product. Employees are prohibited from playing on The Company using their funds, other than for testing purposes. This is continuously followed by Back-Office procedures.