

Velatus N.V

Responsible Gaming Policy

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Definitions

Responsible Gaming

This term encompasses the policies and practices designed to prevent and mitigate irresponsible behavior related to gaming, with the primary goal of safeguarding vulnerable individuals and groups.

Vulnerable Groups

Vulnerable groups refer to segments of the population that may be at higher risk of harm from gaming activities. These include, but are not limited to, minors (under the age of 18), individuals with low income, people struggling with gambling addiction, and those experiencing mental health issues or psychological disorders.

Responsible Gaming Officer

A designated individual appointed under this policy to oversee and implement the Responsible Gaming Programme.

Player

A person of legal age who places bets or pays to participate in a game of chance with a licensed operator. The player may receive a prize—either monetary or in kind—if they correctly predict an outcome that is inherently uncertain and determined by chance or coincidence.

Self-Exclusion

A voluntary mechanism that allows individuals to temporarily or permanently restrict their access to a gaming site or specific features within it. This tool supports self-regulation, giving individuals the opportunity to pause and reflect on their gambling behavior and its potential impacts.

Marketing, Promotion, and Advertising

These terms refer to all strategies, messaging, and media used to publicize an operator's brand, services, and products. This includes, but is not limited to, print advertising, digital marketing, content creation, and social media campaigns. These activities form part of a broader marketing communications strategy aimed at delivering consistent and targeted messages across multiple channels.

Authorised Operator

A legally recognized entity licensed by the relevant regulatory authority to conduct games of chance and luck.

Policy Overview

Velatus N.V. is a company incorporated under the laws of Curaçao, holding registration number 163778. Velatus N.V holds Curaçao online gaming license (license number OGL/2024/1593/0817), issued by the Curaçao Gaming Control Board. This license mandates full compliance with regional regulations and the jurisdictional restrictions established by the Curaçao regulatory framework.

In compliance with the Curaçao Gaming Control Board's (GCB) regulatory framework, we have developed and implemented a Responsible Gaming Policy that aligns with industry best practices and the specific needs of our target markets. Our policy includes measures to prevent problem gambling, protect vulnerable players, and ensure responsible gaming behaviour across our platform.

By integrating Responsible Gaming principles into our operations, we aim to:

- Promote safe and controlled gaming
- Experiences for all players.
- Prevent underage gambling and ensure compliance with age restrictions.
- Provide tools and resources to help players manage their gambling behaviour.
- Support initiatives that address problem gambling and player well-being.

We value our players and hope that you enjoy our products responsibly, and that gambling continues to be fun and entertaining. It is our mission to provide our players with the most entertaining gambling experience and it is our duty to help prevent compulsive use of and underage access to our gaming products. As a responsible, licensed gaming company, we have implemented a number of company policies and tools to promote responsible gambling.

Our objective is to ensure that our players enjoy our services in a safe, secure and supportive manner.

Player Information and Accessibility

As a licensed casino operator, we are committed to ensuring that players have access to clear, transparent, and accessible information that allows them to make informed decisions about their gaming activities. In compliance with the regulatory requirements set by the Curaçao Gaming Control Board' (GCB), we provide comprehensive Responsible Gaming measures throughout our website and application interface.

Our Responsible Gaming Policy is prominently displayed on our homepage and is easily accessible from all relevant sections of our platform. This policy is available in English as well as the languages of our target markets, ensuring that all players can fully understand their rights and the available responsible gaming resources.

We offer direct access to player protection tools that enable players to manage their gaming behaviour effectively: These tools include:

- **self-exclusion options**

Self-exclusion is a decision taken by the player in strict exercise of his self-control and will power. It is intended as a tool for making conscious and informed decisions regarding gaming and, therefore, it is the player's own responsibility to fulfil it, without prejudice to the actions that the Operator may take with respect to excluded players to ensure compliance with the self-exclusion decision.

- **cooling-off periods**

A cooling-off period in gambling is a temporary self-exclusion tool that allows players to take a break from gambling for a specific period of time. It is designed to help individuals regain control over their gambling habits and prevent impulsive behaviour.

During a cooling-off period, the player cannot deposit, place bets, or access gambling services on the platform. Unlike permanent self-exclusion, a cooling-off period is temporary and typically lasts from 24 hours to several months, depending on the platform's responsible gaming policies.

- **deposit limits**

Players have the option to set a cap on the total amount they can deposit within a specified timeframe, such as daily, weekly, or monthly.

Once the set deposit limit is reached, the player will be restricted from making additional deposits until the limit resets for the next period.

Furthermore, we provide direct links to reputable gambling addiction support organizations that provide free, confidential support and resources for individuals struggling with problem gambling.

Through these comprehensive measures, we strive to create a safe, transparent, and responsible gaming environment where gambling remains an enjoyable form of entertainment while minimizing potential risks associated with problem gambling.

Age Verification

To prevent underage gambling, we enforce a strict age verification process:

- Players must confirm they are 18 or older before depositing or playing.
- Age verification is conducted via Date of Birth confirmation, an "I am over 18" checkbox, and payment method verification.
- Government-issued IDs (passport, national ID, or driver's license) must be provided as part of the Know Your Customer (KYC) process.
- If a player is found to be underage, their account will be closed, deposits will be refunded (except in cases of AML holds), and any winnings will be forfeited.
- Records of all verification attempts are maintained for regulatory review.

Parental Control and Internet Filtering

To prevent underage access, we encourage adults to safeguard usernames, passwords, and payment details. We also recommend third-party parental control software such as:

- **Net Nanny** (www.netnanny.com)
- **GamBlock** (www.gamblock.com)
- **CyberSitter** (www.cybersitter.com)

Self-Assessment Tools

Players can access their betting history and transaction records to assess their gambling behaviour. We provide self-assessment tools like acknowledged quizzes and questionnaires.

Behaviour Tracking & Intervention

Frontline personnel, such as customer service representatives and VIP managers, are responsible for monitoring player behaviour to identify potential issues through patterns and direct interactions. When at-risk behaviour is detected, trained responsible gaming professionals reach out to the players, offering options like deposit limits, cooling-off, and self-exclusion. In severe cases, mandatory account restrictions or self-exclusion may be enforced. The company also employs trained staff and technological tools, including gaming platform features, in-game tools, artificial intelligence (AI), and machine learning (ML), to enhance monitoring efforts.

Key monitoring factors

- **Deposit and Wagering Frequency:** Noticing sudden increases or irregular patterns in deposits, wagers, or gaming sessions.
- **Multiple Payment Methods:** Observing the use of various payment options, especially if it seems aimed at bypassing limits.
- **Reversing Withdrawals:** Identifying players who frequently cancel withdrawal requests.
- **Extended Play Sessions:** Monitoring prolonged gaming periods without breaks.
- **Increased Communication with Customer Support:** Tracking frequent contacts, especially those involving bonus requests or signs of agitation.
- **Frequent Changes to Responsible Gaming Tools:** Watching for repeated adjustments to deposit limits or frequent use of cooling-off periods.
- **Young Players Spending Substantial Amounts:** Paying attention to players under 25 years old who spend significantly, particularly on casino or virtual games.
- **Maxing Out Credit Cards:** Noting players who exhaust their credit limits and attempt to register additional cards.
- **Unrealistic Spending Patterns:** Detecting spending behaviours that don't align with the player's demographic profile.
- **Attempts to Open Multiple Accounts:** Identifying efforts to create multiple accounts to circumvent deposit limits.

Procedures for Player Identification and Intervention

Velatus N.V has a structured approach to addressing problem gambling behaviour:

Risk Assessment of Players Profile

- Establishing player profiles with relevant data to assess individual risk levels.
- Continuously monitoring behavioural risk factors with real-time alerts for concerning activities.

Direct Player Interaction:

- Initiating contact with players exhibiting concerning behaviour through trained responsible gaming professionals.
- Documenting interactions, indicators of concern, and actions taken within the Player Account Management system.

Interventions of Responsible Gaming:

- Informing at-risk players about tools like deposit limits, time-outs, and self-exclusion.
- Following clear guidelines for escalating concerns, which may involve applying deposit limits, temporarily suspending access pending further review, or excluding the player in cases of extreme risk.

Staff Training

The company ensures that customer service and responsible gaming staff are trained to:

- **Recognize signs of gambling distress**, identify indicators such as agitation, aggression, financial desperation, preoccupation with gambling, and significant increases in gambling frequency or stakes
- **Conduct sensitive and structured conversations with at-risk players.** Engage with at-risk players empathetically, utilizing effective communication techniques to discuss their gambling behaviours and offer support.
- **Direct players to appropriate support resources and responsible gaming tools.** Inform players about available resources, including self-exclusion programs, deposit limits, time-outs, and external support services like counselling and helplines.
- **Document all interactions for compliance and follow-up actions.** Maintain detailed records of all interactions with players concerning responsible gaming to ensure compliance with regulatory requirements and facilitate appropriate follow-up actions.

Training is conducted at least annually and more frequently if necessary. The training program is regularly updated to incorporate the latest best practices and feedback from internal and external stakeholders. Effectiveness is evaluated through formal

mechanisms, such as pre- and post-training assessments, to ensure staff are well-prepared to support responsible gaming initiatives.

Escalation

When problematic gambling behaviours are identified, they are promptly escalated to the Compliance Officer or Responsible Gaming Officer. These officers conduct a comprehensive assessment of each case to determine the most appropriate interventions, which may include:

1. **Implementing Further Restrictions:** This may involve setting stricter deposit or wagering limits, adjusting time constraints, or modifying access to certain gambling products to help the individual regain control over their gambling activities.
2. **Facilitating Self-Exclusion:** Providing support and guidance to individuals who choose to voluntarily exclude themselves from gambling activities for a specified period, aiding in their commitment to responsible gaming practices.
3. **Enforcing Mandatory Exclusion:** In cases where voluntary measures are insufficient, the officer may impose mandatory exclusion from gambling activities to protect the individual from further harm.
4. **Providing Information on Support Services:** Offering details about available counselling and support services, such as helplines and treatment programs, to assist individuals in addressing their gambling behaviours.
5. **Monitoring and Follow-Up:** Establishing ongoing monitoring and follow-up procedures to ensure the effectiveness of the interventions and to provide additional support as needed.

Cooling-Off Period

As an operator committed to responsible gaming, we ensure that the cooling-off period is easily accessible, immediate, and free from interference. If technical or platform modifications are required to implement this feature, we will provide this service manually until a technological solution is fully integrated.

Availability and Accessibility

We offer players the option to activate a cooling-off period of 24 hours, 7 days, 1 month, or 3 months, on all product verticals available on our platform, during which they will be temporarily restricted from gambling activities. The cooling-off option will be clearly displayed on our website and accessible via a single-click button, without the need for email communication or operator approval.

Immediate Activation and Restrictions

Upon a player's selection of the cooling-off option, the following measures are implemented to promote responsible gambling:

- **Clarification of Options:** Players are informed about the distinctions between a cooling-off period and self-exclusion, allowing them to make an informed choice. They may opt for self-exclusion if it better suits their needs.
- **Instant Enforcement:** The chosen restriction is applied immediately, ensuring prompt adherence to the player's decision.
- **Account Suspension:** The player's account is temporarily locked, preventing any gambling activities during the specified cooling-off period.
- **Marketing Opt-Out:** Players are provided the option to remove themselves from marketing communications throughout the duration of the cooling-off period.

To uphold ethical standards, our policy strictly prohibits any actions that may discourage players from initiating a cooling-off period, including:

- **Questioning the Player's Decision:** Respecting the autonomy of the player's choice without inquiry.
- **Offering Reassurances to Delay the Process:** Avoiding any attempts to persuade the player to reconsider or postpone their decision.
- **Providing Incentives to Continue Playing:** Refraining from offering bonuses, promotions, or similar incentives to encourage continued play.

Reactivation and Additional Time-Out Options

At the conclusion of the cooling-off period, the player's account is automatically reactivated, allowing the resumption of gaming activities without the need for further action.

Self-Exclusion

We have established a comprehensive and well-documented self-exclusion program designed to empower players to manage their gambling behaviour and mitigate potential harm. Key components of this program include:

1. **Immediate Implementation:** Upon a player's request for self-exclusion, the restriction is enforced without delay, effectively preventing access to gambling activities.
2. **Self-Exclusion Register Maintenance:** We maintain a dedicated Self-Exclusion Register, recording details of self-excluded players. These records are retained for a minimum of seven years following the conclusion of the exclusion period, ensuring compliance with regulatory obligations and facilitating ongoing support.
3. **Payment Method Restrictions:** Any known payment methods associated with a self-excluded player are blocked during the exclusion period. This measure prevents the circumvention of self-exclusion restrictions and reinforces the effectiveness of the program.
4. **Comprehensive Support and Resources:** We provide self-excluded individuals with information about available support services, including counselling and support groups, to assist in managing their gambling behaviour.
5. **Regular Program Evaluation:** Our self-exclusion program undergoes regular assessments to ensure its effectiveness and alignment with evolving best practices in responsible gambling. Feedback from participants is utilized to enhance the program continually.

By implementing these measures, we aim to create a safer gambling environment and support individuals in maintaining control over their gambling activities.

Sources

Self-Exclusion Process and Requirements

Accessibility and Communication

To ensure that self-exclusion is easily accessible and transparent, we provide the following:

Prominent Visibility: The self-exclusion option is clearly displayed across our website, ensuring easy access for all players.

Comprehensive Information: Players will receive clear guidance on:

- The steps required to initiate and complete self-exclusion.

- The range of available self-exclusion durations.
- The benefits of self-exclusion as a responsible gaming tool to prevent problem gambling.

Multi-Channel Availability: Self-exclusion information and tools will be accessible via the website, mobile app, customer support, and responsible gaming help sections.

Immediate and Irreversible Action

Instant Activation: Players can self-exclude entirely online without requiring email confirmation, manual approval, or customer support intervention.

User-Friendly Process: The self-exclusion process is streamlined to be easy to understand and completed within 15 minutes.

Fraud Prevention Measures: Advanced verification tools are in place to detect duplicate accounts and prevent self-excluded players from registering new accounts using alternative credentials.

Comprehensive Blocking: A self-excluded player will also be restricted across all our domains and will be encouraged to self-exclude from other gambling operators via national self-exclusion schemes.

Self-Exclusion Periods and Restrictions

In strict compliance with regulatory standards, we offer long-term self-exclusion options, including:

- **1 Year, 3 Years, 5 Years, 10 Years, and Lifetime Self-Exclusion**
- **Instant Enforcement:** Once a self-exclusion request is submitted, it is applied immediately without delay.
- **Ethical Implementation:** We strictly prohibit any actions that discourage self-exclusion, including:
 - Questioning the player's decision.
 - Offering incentives, bonuses, or promotions.
 - Providing reassurances to reconsider the decision.
 - Delaying or obstructing the self-exclusion process.
- **Irreversible Commitment:** Once self-exclusion is confirmed, it cannot be revoked or shortened before the designated period ends.
- **Customizable Exclusion:** Players may self-exclude from one, multiple, or all product verticals (e.g., casino, sportsbook, poker).

Financial and Account Management

When a player opts for full self-exclusion across all verticals:

- **Transaction Blocking:** All gambling-related transactions are immediately halted.
- **Account Deactivation:** The player's account is suspended to prevent further engagement.
- **Fund Reconciliation:** Any remaining withdrawable funds, excluding those subject to AML (Anti-Money Laundering) restrictions, will be refunded to the original payment method within two business days.
- **Marketing Removal:** The player is permanently unsubscribed from all promotional and marketing communications.

For self-exclusion from specific verticals:

- **Targeted Restriction:** Gameplay and wagering access are restricted according to the player's chosen exclusions while allowing access to permitted products.

Reactivation and Post-Exclusion Protocol

At the conclusion of the self-exclusion period:

- **Written Reactivation Request:** Players must submit a formal request to restore their account.
- **Responsible Gaming Support:** Before reactivation, players will receive responsible gaming guidance, including reminders of available protective measures.
- **Gambling Awareness Questionnaire:** To encourage informed decision-making, players will be asked to complete a self-assessment questionnaire regarding their gambling habits.
- **Account Reactivation Under Original Credentials:** The player's gaming history is preserved, and their account is only restored under the original registered details to prevent circumvention of previous exclusions.

These policies ensure that self-exclusion remains an effective tool for players seeking control over their gambling behaviour while promoting a safer and more responsible gaming environment.

Marketing and Contact Restrictions

During and after a self-exclusion period, the following restrictions will apply:

- **Limited Communication:** Players will not receive any contact from us unless it pertains to legal matters or essential non-promotional information.
- **No Marketing or Incentives:** Self-excluded players will not be sent promotional content, free play offers, bonuses, or any form of gambling-related incentives.
- **Reactivation Procedures:** While cooling-off periods conclude automatically, reactivating an account after self-exclusion requires explicit player action to resume gameplay.

Compliance and Regulatory Obligations

To ensure full compliance with responsible gaming regulations, all self-exclusion activities will be documented in real time. In the event that a self-excluded player or an underage individual gains access to gambling services beyond their exclusion settings:

- **Refund of Deposits:** Any deposited funds (excluding those restricted by Anti-Money Laundering (AML) policies) will be refunded within two business days.
- **Immediate Account Suspension:** The account will be blocked to prevent further access.
- **Regulatory Reporting:** A formal incident report will be submitted to the relevant regulatory authority within five working days.

Initiated Exclusion

In certain circumstances, we may proactively exclude a player as part of our high-risk intervention measures, particularly if:

- **Evidence of Problematic Gambling Behaviour:** The player exhibits signs of compulsive or high-risk gambling behaviour.
- **Involvement in Criminal Activities:** The player engages in fraudulent or unlawful activities on our platform.

All cases of initiated exclusion will be formally documented, with records retained for a minimum of five years to ensure regulatory compliance and responsible gaming enforcement.

Limits

We offer a suite of tools designed to help players manage their gambling activities responsibly. These tools include the ability to set deposit limits on a daily, weekly, or monthly basis. Players can decrease their limits at any time with immediate effect, while requests to increase limits are subject to a waiting period to ensure informed decision-making.

Deposit and Other Limits

- **Deposit Limits:** Players can set maximum deposit amounts for specified periods (daily, weekly, or monthly). Once a limit is reached, no additional deposits are permitted until the next period begins.
- **Modification of Limits:**
 - **Decreasing Limits:** Requests to lower deposit limits take effect immediately, allowing players to promptly reduce their spending.
 - **Increasing Limits:** Requests to raise deposit limits are subject to a mandatory seven-day waiting period, promoting thoughtful decision-making and preventing impulsive increases.

By providing these customizable tools, we aim to empower players to maintain control over their gambling activities and promote a safe and enjoyable gaming environment.

Reality Check

To support responsible gambling practices, we have implemented comprehensive **Visible Real-Time Session Timer** designed to help players monitor and manage their gaming activities effectively.

A continuously displayed timer tracks the duration of each gaming session, allowing players to remain aware of the time spent on the platform.

By integrating this tool, we aim to promote safer gaming habits and empower players to maintain control over their gambling behaviour.

Marketing and Advertising

We adhere to responsible gaming principles in all marketing and advertising efforts. Direct marketing (emails, SMS, push notifications) is strictly prohibited during active cooling-off or self-exclusion periods.

Advertising and Marketing Restrictions

We ensure:

- No aggressive, misleading, or irresponsible advertising.
- No targeting of vulnerable groups, minors, or problem gamblers.
- No portrayal of gambling as an investment or financial solution.
- No emotional manipulation or misleading representations of skill vs. chance.

Affiliate and Social Media Advertising

- All affiliates must comply with responsible gaming standards.
- Social media influencers must be of legal age, have appropriate audiences, and refrain from sexually provocative content.
- Sponsorships must not target vulnerable individuals, minors, or youth-related events.

This policy reinforces our commitment to responsible gaming and ensures compliance with regulatory standards. This policy is subject to regular reviews and will be updated as necessary. All revisions are subject to approval by the Board of Directors.



Capital Trust Corporation N.V.
Director of Velatus N.V.

10.03.2025