

RESPONSIBLE GAMING AND SELF-EXCLUSION POLICY

Superbet88 International N.V.

Registration Number: 161859 (0)

Address: Schottegatweg Oost 10, Unit 1-9, Bon Bini Business Center, Curaçao

Legal Form: Limited Liability Company

Statutory Seat: Curaçao

Date of Incorporation: September 16, 2022

Date: 2026-01-19-v.02

Superbet88 International N.V., a private legal entity incorporated under the laws of Curaçao, registered under number 161859 (0), with its statutory seat at Schottegatweg Oost 10, Unit 1-9, Bon Bini Business Center, Curaçao, hereby adopts this Responsible Gaming and Self-Exclusion Policy as a formal, binding, and permanent governance instrument applicable to all gaming and betting activities offered through its digital platforms.

This Policy has been drafted, reviewed, and structured in strict compliance with the Responsible Gaming Policy for Licensed Operators, version 1.0, dated 17 April 2025, issued by the Curaçao Gaming Authority, as well as with the National Ordinance on Games of Chance, and is further aligned with internationally recognized best practices applicable to regulated gaming and betting operators.

The primary purpose of this Policy is to ensure that all gaming activities offered by Superbet88 are conducted exclusively as a lawful and responsible form of entertainment, preventing financial, emotional, and social harm, protecting vulnerable persons, promoting informed and conscious decision making by players, and ensuring the availability of effective mechanisms to control, limit, or interrupt gambling activity whenever necessary.

This Policy applies broadly to all players, employees, directors, officers, representatives, affiliates, marketing partners, influencers, service providers, and any third parties acting directly or indirectly on behalf of Superbet88.

1. REGULATORY BASIS AND APPLICABLE CONCEPTS

For the purposes of interpretation and application of this Policy, the Curaçao Gaming Authority is understood to be the regulatory authority responsible for the licensing, supervision, oversight, and enforcement of gaming and betting activities in Curaçao. Games of chance include all gaming modalities in which monetary value is wagered with the expectation of gain, where the outcome depends wholly or partially on chance, including sports betting, casino games, poker, and peer to peer games.

A minor is defined as any person under eighteen years of age, whose participation in any gaming activity is strictly prohibited. A vulnerable person is any individual who, in accordance with applicable law, lacks adequate control

over gambling behavior, shows signs of addiction, is prohibited from gambling by their own request or by third parties, or is in a situation of significant financial distress, including declared bankruptcy.

Cooling off refers to a temporary and voluntary break from gambling initiated by the player, during which wagering activities are suspended. Self exclusion refers to a long term voluntary exclusion mechanism that prevents the player from accessing any gambling activity offered under the operator's license and is irrevocable for the duration selected.

2. GOVERNANCE, RESPONSIBILITIES AND CONTROL STRUCTURE

Superbet88 integrates Responsible Gaming principles into its corporate governance framework and operational structure, treating Responsible Gaming as a permanent regulatory obligation and as a core element of operational integrity. The Company formally designates its Compliance Officer as Responsible Gaming Officer, granting the necessary authority and autonomy to implement, supervise, monitor, document, and report all Responsible Gaming related measures.

The Responsible Gaming Officer is responsible for ensuring consistent application of this Policy across all operational areas, promoting continuous training, overseeing behavioral monitoring tools, evaluating the effectiveness of existing safeguards, and preparing an annual report to Senior Management containing consolidated data, critical analysis, and recommendations for improvement. Any material amendments to this Policy shall be duly assessed and formally communicated to the Curaçao Gaming Authority.

Superbet88 expressly declares that it does not offer credit, loans, deferred payments, or any financial facilities that would allow players to gamble with funds that do not belong to them.

3. ABSOLUTE PREVENTION OF UNDERAGE GAMBLING

Participation in gambling activities by minors is strictly prohibited. Superbet88 implements a robust, layered, and fully documented age verification system that begins at registration and continues throughout the player relationship.

This process includes mandatory age self declaration, submission of date of birth, compulsory provision and verification of a valid government issued identification document, as well as additional electronic, biometric, or third party database checks where required to ensure a high level of certainty regarding the player's age.

No withdrawal is permitted unless the identity and age verification process has been satisfactorily completed. If, at any time, an account is identified as belonging to a minor, the account shall be immediately closed, deposited funds shall be

handled in accordance with applicable civil law, winnings may be voided, and all relevant records shall be retained for regulatory review.

4. PLAYER INFORMATION, TRANSPARENCY AND ACCESSIBILITY

Superbet88 maintains a dedicated Responsible Gaming section that is permanently available and clearly accessible from the homepage, the website footer, and the Terms and Conditions. This section is provided in English and in the language of the target market, with the English version prevailing in case of any interpretative discrepancies.

Within this section, players are provided with clear information regarding gambling related risks, guidance on responsible gambling behavior, immediate access to all available control tools, contact channels with Responsible Gaming trained support staff, and links to independent support and treatment organizations.

5. SELF ASSESSMENT AND AWARENESS OF GAMBLING BEHAVIOR

Superbet88 ensures that players have continuous and transparent access to their complete betting, wagering, deposit, withdrawal, win, loss, and activity time history for a minimum period of six months, without prejudice to longer statutory retention periods.

In addition, the Company provides internationally recognized self assessment tools designed to encourage players to reflect on their gambling habits, identify potential risk indicators, and take preventive action in an informed and voluntary manner.

6. BEHAVIORAL MONITORING AND RISK IDENTIFICATION

Superbet88 applies continuous and integrated monitoring of player behavior through automated systems, data analysis, and the involvement of trained personnel. Monitoring takes into account financial patterns, wagering frequency, session duration, interactions with customer support, withdrawal reversal attempts, frequent changes to limits, and other relevant behavioral indicators.

The identification of a single isolated factor does not automatically result in a risk classification. Assessments are based on the frequency, intensity, and combination of indicators, always applying proportionality and prioritizing player protection.

All Responsible Gaming related interactions are properly recorded in the Player Account Management system to ensure traceability, transparency, and auditability.

7. INTERVENTIONS AND PROTECTIVE MEASURES

When indicators of problematic gambling behavior are identified, Superbet88 applies graduated and proportionate interventions, which may include informative communications, personalized guidance, mandatory application of limits, activation of cooling off periods, temporary suspension, or permanent exclusion.

Under no circumstances are Responsible Gaming measures used to delay, prevent, or obstruct legitimate player withdrawals. Interventions are implemented exclusively for the purpose of player protection and risk mitigation.

8. VOLUNTARY COOLING OFF PERIODS

Players may activate voluntary cooling off periods at any time for predefined durations, during which gambling activities are immediately suspended. During the cooling off period, deposits are disabled, wagering is blocked, withdrawals remain available, and promotional communications are suspended where applicable. Account access is automatically restored upon expiration of the selected period.

9. SELF EXCLUSION

Superbet88 provides a long term self exclusion mechanism that can be fully initiated online by the player without operator approval. Self exclusion prevents access to all brands, domains, and gambling verticals operated under the Company's license and remains irrevocable for the selected duration.

During the self exclusion period, the player account is closed, access is blocked, all marketing communications are permanently disabled, technical measures are implemented to prevent account circumvention, and records are retained in accordance with applicable legal requirements.

Any request for reactivation may only be made after the exclusion period has expired and must be expressly initiated by the player. Reactivation shall never be initiated by the operator.

10. OPERATOR INITIATED EXCLUSION

Superbet88 reserves both the right and the obligation to exclude players where consistent evidence of elevated risk, persistent problematic gambling behavior, or suspected criminal activity is identified. Such exclusions are fully documented, retained for a minimum of five years, and made available to the Curaçao Gaming Authority upon request.

11. FINANCIAL AND OPERATIONAL LIMITS

The Company provides tools allowing players to define financial limits on deposits over defined periods. Any request to increase limits becomes effective only after a mandatory reflection period, while reductions take effect immediately. Existing wagers placed prior to the activation of limits remain unaffected.

Additional limits, including time limits, loss limits, or wagering limits, may be implemented based on the assessed risk profile of the player.

12. TRAINING AND STAFF CAPACITY BUILDING

All employees who interact with players receive mandatory and periodic Responsible Gaming training covering the identification of vulnerability indicators, ethical communication practices, intervention protocols, and guidance on internal tools and external support services.

13. ADVERTISING, MARKETING AND COMMUNICATIONS

Superbet88 commits to responsible, transparent, and ethical advertising practices, refraining from targeting vulnerable persons or minors, portraying gambling as a financial solution, using emotional manipulation, or associating gambling with enhanced social or personal success. All commercial communications include clear Responsible Gaming messaging. Contracted third parties are required to fully comply with this Policy.

14. ENHANCED MEASURES AND CONTINUOUS IMPROVEMENT

Where higher risk levels are identified, the Company may implement enhanced Responsible Gaming measures, including reality checks, session timers, direct player contact, and recommendations for external blocking tools. This Policy is subject to periodic review, internal audits, and updates in line with regulatory developments.

15. FINAL PROVISIONS

Superbet88 reaffirms that Responsible Gaming constitutes a fundamental pillar of its regulated operations. Gambling must always remain a voluntary, conscious, balanced, and secure activity. The Company is committed to protecting players, fulfilling its legal obligations, and maintaining transparent cooperation with the Curaçao Gaming Authority.