

Responsible Gaming Policy

Genius Touch B.V. (reg. No. 160903)

Version 1.0

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Approved by: Menno Jordaan, Director

1. INTRO

Genius Touch B.V., the company registered in Curaçao, with its company number 160903, with registered office at Kaya W.F.G. (Jombi) Mensing 24 Unit A (hereinafter to be referred to as “**Company**”, “**we**”, “**us**”, “**our**”) has developed this Responsible Gaming Policy (the “**Policy**”) in order to foster a safe, transparent, and fair gaming environment and to prevent illegal or fraudulent activity that may be conducted utilizing the services of the Company..

This Responsible Gaming framework was developed by the Company taking in consideration of its business model, which involves gambling offerings facilitated through the use of cryptocurrencies. It has been specifically tailored to address the elevated risk factors associated with:

- Anonymity and speed of cryptocurrency transactions;
- Increased volatility in player spending behavior;
- Potential for higher value deposits and wagering through digital assets;
- Risk exposure from unregulated or pseudonymous jurisdictions.

2. LEGAL GROUND

This Policy has been created subject to the following laws, regulations, recommendations, guidelines, and rules:

a. The provisions of Curacao’s gambling legal framework, which include, but are not limited to:

- The National Ordinance on Games of Chance (LOK), which came into effect on December 24, 2024 (“National Ordinance” or “LOK”);
- Responsible Gaming Policy for Licensed Operators from Curacao Gaming Authority (CGA);
- Other applicable regulation.

3. PRINCIPLES OF THE POLICY

The Company employs the following principles to manage risks related to

responsible gaming:

- Protection of the Vulnerable Persons
- Promotion of responsible gambling narrative along with mitigation or prevention of problem gambling behaviour materials;
- Transparency and cooperation in providing information on responsible gaming including offering players easy access to external Responsible Gaming Policy, tools for player's behaviour/gambling self-control, and information about organizations that could provide the players with any help/support in case of pathological/problematic gambling;
- Establishing monitoring mechanisms for promptly detecting, addressing and preventing any pathological/problematic gambling behaviour;
- Compliance with all regulatory reporting and auditing obligations;
- No credit can be offered to players for the purpose of wagering.

4. CORE MEASURES OF RESPONSIBLE GAMING PROGRAM OF THE COMPANY

The Company's Responsible Gaming program consists of the following measures:

- Age verification;
- Information accessibility;
- Player self-assessments;
- Behaviour tracking;
- Cooling-off Periods and Self-exclusion;
- Deposit limits;
- Consumer Advertising and Marketing;
- Training of employees;
- Consumer Advertising and Marketing;
- Enhanced Responsible Gambling measures.

5. Prevention of underage gambling

The Company understands the moral aspect of prohibiting the access to gambling for minors and is fully committed to applying strict age verification measures.

The Company does not bear any responsibility for information submitted by players and encourage anyone to act in good faith and without any abuse of Company's policy. The players are solely responsible for proving that they are of full age.

During the account registration process, each player could be required to pass multi-step verification process. This verification process includes:

1. **Self-Attestation at Registration.** When registering an account with the Company's websites, each player could be requested to enter their date of birth and confirm they are over 18 by marking a designated checkbox.
2. **Initial Age Verification.** The Company, upon its sole discretion, could carry out identity checks to gain sufficient certainty that the individual is not a minor. Those checks may include:
 - Matching information provided during account registration with government-issued valid ID (such as a passport, national ID, or driver's license), Such check may be conducted:
 - Upon reaching specific transaction or deposit thresholds.
 - In all cases before the first withdrawal is permitted.
3. **Secondary verification.** In order to approve that the verified account of full-age player is not used by any other person, the Company, at its own discretion, may undertake the following verification methods :
 - **Electronic verification systems.** Matching personal data against official or commercial databases.
 - **Payment validation.** Confirming the identity and ownership of the player's payment instrument.
 - **Third party or government database checks.** Verifying age and identity through reliable external sources.
 - **Selfie verification.** Matching a live image of the user with the photo on the submitted ID document.

Any player bears responsibility for providing misleading information on his identity and will meet the consequences in case of not following legitimate requests of the Company. If at any point, notwithstanding the checks put in place, the Company becomes aware that the player is a minor, the account will be closed immediately.

6. Player Information and Accessibility

The Company makes efforts to develop, integrate and timely update distinct Responsible Gaming Sections within its website or app (the “**RG Section**”) in order to inform player community on the importance of entertainment gambling and prevention of entertainment becoming problematic.

The Company’s RG section displaced on the website and app are developed and updated in consistence with the following principles:

- It is clearly identifiable and easily accessible from different interfaces;
- It provides easily understandable information so that player can make informed choices;
- It may offer direct access to all relevant Responsible Gaming tools through which a players may manage their gaming behaviour. Those tools may include self-exclusion, cooling-off period, limit setting and other Responsible Gaming measures;
- It may include prominent contact information allowing players to reach the Company regarding any Responsible Gaming concerns. It may include reference to email or live chat support.
- It may contain links to international gambling support organizations, such as GamCare (<https://www.gamcare.org.uk>), Gamblers Anonymous (<https://www.gamblersanonymous.org>), GambleAware (<https://www.begambleaware.org>) or any other organization fighting with problematic gaming.

The Company’s footer on the websites will include the following information:

- A clear visual indication that under-age gambling is prohibited.
- The name and registered address of the license holder.
- The official license number issued by the Curacao Gaming Authority.
- A statement confirming the regulatory oversight of the Licensee’s operations by the Curacao Gaming Authority.
- A link to the RG Section
- The operators CGA digital seal.

A direct link to one or more gambling addiction support resources such as GamCare (<https://www.gamcare.org.uk>), Gamblers Anonymous (<https://www.gamblersanonymous.org>), GambleAware (<https://www.begambleaware.org>) or any other organization fighting with problematic gaming.

7. Self-Assessment

The Company may provide players, either through the website or upon request, with access to detailed records of their betting and wagering history including timestamps of transactions from their player account for last six months.

Records covering a period longer than 6 months could be provided to players only upon their request and may be provided by the Company within ten (10) working days after receipt of the request from identified player.

At any time, the Company could encourage players to assess their gaming habits to determine whether their gambling remains within healthy limits and convince players on the presence of problem gambling from their side by posting or send responsible gaming materials, links to self-assessment tools like 20-question quiz on <https://gamblersanonymous.org/20-questions/>, or providing scientifically recognized screening tool, like CAGE Questionnaire, both through the website or ap, or directly to player.

The Company is committed to encouraging players to avoid abuse with gambling among its websites/apps, and for this purpose could develop and implement innovational responsible gaming informing approaches.

8. Tracking of Player`s Behaviour

The Company could screen players` behaviour to detect any potential signs of problematic gambling. Such behaviour screening could be made to detect early warning indicators and apply appropriate intervention strategies to mitigate potential harm, particularly for high-risk players.

Problematic gambling behaviour could be identified through presence of multiple indicators described below occurring simultaneously and consistently.

To ensure an effective detection mechanism, the Company may use a combination of manual oversight and advanced technological tools, including but not limited to:

- **Frontline monitoring** by trained staff (e.g., customer service representatives, VIP managers);
- **Technological tracking tools** that could be integrated within the gaming platform, including artificial intelligence (AI), machine learning (ML), and in-game behavioral tracking features.

The problematic gambling indicators mostly 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 loss limits or repeatedly making use of cooling-off period;
- ✓ **Players maxing out a credit card**;
- ✓ **Attempts to open multiple accounts** to bypass deposit or loss limits.

In case of detecting the problematic gambling indicators, the Company, at its sole discretion, could decide on method of intervention. In general, identifying of those indicators consists of following stages and procedural steps:

1. **Player Profiling and Risk Assessment:**

- 1.1. The Company establishes and maintains player profiles incorporating relevant data points to assess individual risk levels;
- 1.2. The Company may use risk-based approach to determine the appropriate level of monitoring and intervention.
- 1.3. The Company could record and store Responsible Gaming interactions—whether initiated by the player or the Company - in the Player Account Management (PAM) system, along with the indicators of concern and any actions taken.

2. **Responsible Gaming Interventions.** When players are identified as exhibiting at-risk behaviour, the Company could apply intervention strategies designed to reduce harm, including but not limited to:

- 2.1. Informing players about available Responsible Gaming tools (e.g., deposit limits, cooling-off periods, self-exclusion);
- 2.2. Activating a clear escalation protocol based on the severity and persistence of the risk, which may include:
 - Applying mandatory deposit limits to the player's account;
 - Temporarily suspending the account pending further assessment;
 - Permanently excluding the player in cases of severe or persistent risk.

9. Cooling off and Self-Exclusion

The Company has two key mechanisms that can be available to players at all times via the RG Section of the website or app to empower the player to manage their own gambling behaviour:

- a. **Cooling Off:** A short-term, temporary restriction from gambling activities, which the player can customize.
- b. **Self-Exclusion:** A long-term, irrevocable exclusion from all gambling activities under the operator's licence.

Where the player requests any of tools for gambling behaviour management the Company will not:

- Question the player's decision;
- Offer bonuses or promotions to encourage the player to continue playing;
- Delay or complicate the activation process.

The mentioned mechanisms will be activated upon the respective player's request receipt and activated mechanisms could not be changed, or lapse before requested period.

The player could retrieve access to the account only by making such a request after the Cooling off or Self-Exclusion periods have ended. Such request shall be done via available customer support chats, email or by any other method available on Company's websites

1. Cooling Off:

The players could choose different options for activating a cooling-off period, during which they are temporarily restricted from gambling activity. The cooling off period could be configured by the following features:

1. Duration: duration options - 24 hours, 7 days, 1 month, 3 months. The restrictions must take effect immediately and be enforced according to the player's selections.

2. Marketing: automatic Opt-Out

The following categories are at the discretion of the Company:

3. Vertical: includes all gambling activity or on separate gaming verticals offered by the Company

4. Brand: (includes both the primary and any mirror domains of the Company's brand)

Accounts will be automatically reactivated after the selected Cooling Off period expires. No further action is required by the player.

2. Self-Exclusion

The Company could offer players the following options to self-exclude partially or entirely from gambling activity:

1. Duration: the Company offers a long-term self-exclusion period of at least 1 year. Duration Options - 1 year; 3 years; 5 years; 10 years; Lifetime.
2. Brand: All brands/domains operated under the operator's license.
3. Vertical: All gambling activity or separate gaming vertical
4. Marketing: Automatic opt-out

The player should be able to initiate and complete the self-exclusion process fully online, without requiring email communication or operator approval.

The Company has an ability to exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour;
- The player attempts or engages in criminal activities through the operator's platform;
- Operators may not exclude players solely based on the amount of their winnings.

10. Deposit Limits

The Company could provide players with the tools to control their gambling activity by setting deposit limits. Players can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).

Once a player sets a deposit limit, they will not be able to deposit additional funds until the specified time period resets. Also, the players could:

- **Requests to increase the severity** of the limit (e.g., lowering the maximum deposit amount) take effect immediately.

- **Requests to decrease the severity** of the limit (e.g., raising the deposit threshold) are subject to a 24-hour cooling-off period before they are implemented.

11. Training, Staff Readiness and Responsible Gaming Officer

In order to keep customer service and Responsible Gaming staff eligible to handle player interactions professionally and effectively, the Company could conduct different training, create training programs or apply any other methods for enhancing the staff qualification in the field of Responsible gaming.

Trainings, training programs or any other methods for enhancing the staff qualification in the field of Responsible gaming could include:

- Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation);
- Conducting sensitive and structured conversations with at-risk players;
- Directing players to appropriate support resources and Responsible Gaming tools.

The Company assigns a qualified professional who will oversee the implementation, monitoring, and enforcement of this Responsible Gaming Policy. The Responsible Gaming Officer will:

- Ensure the ongoing implementation and operational compliance with this Responsible Gaming Policy and all related procedures;
- Monitor player behavior and internal processes to detect risks and recommend appropriate interventions or updates;
- Prepare and present a comprehensive reports to the company's senior management, evaluating the effectiveness of the RG measures in place, supported by data, trends, incidents, and regulatory developments;
- Maintain detailed documentation of all RG activities, interventions, and escalations;
- Liaise with internal departments (e.g., customer support, marketing, VIP teams) to ensure coordinated and effective RG enforcement across all touchpoints.

12. Consumer Advertising and Marketing

When planning and carrying out the advertising and marketing, the Company makes efforts to consider the following advertising and marketing principles:

- No Targeting of Vulnerable Groups: marketing including visual content should not directly target under eighteen years of age;
- No Portrayal of Gambling as an Investment: advertising should not promote gambling to achieve financial success or solve financial difficulties;
- No Misrepresentation of Skill vs. Chance: marketing should not suggest that skill can influence the outcome of games that are purely based on chance;
- No Emotional Manipulation: advertising should not portray gambling as a substitute for financial, emotional, or mental well-being;
- No Explicit content: adverts, messaging or any communications should not contain any overt sexual or pornographic imagery or suggestion;
- No Encouragement of Unrelated Harmful Behaviours: there should be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.

13. Enhanced Responsible Gambling measures

Based on higher levels of risk in its business model, the Company could decide to implement the following enhanced measures regarding responsible gambling:

1. **Direct Player Interaction:** When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the Company may initiate direct contact. The Company under this communication advises the player to review the Responsible Gaming area and consider using the available tools and support services.
2. **Reality Check:** include the following measures:
 - A real-time session timer that remains visible at all times while the player is logged in;
 - A real-time clock in the players time zone;
 - Periodic pop-up reminders or prompts about session duration;
 - Player-Activated Reality Checks.

14. RECORDS RETENTION

All interactions between players and the Responsible Gaming team shall be documented and securely recorded within the Player Account Management System. These records shall be retained for the duration of the active player account and, in the event the account is closed or becomes dormant, for an additional period of one (1) year following the date of closure or dormancy unless other timeframe is established by other Policies.