
Responsible Gaming Policy

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1. Objective

Willx N.V. is strongly committed to establishing a safe and healthy gaming environment for its customers. This policy has the purpose to comply with this commitment. This Responsible Gaming policy includes the set of guidelines, practices and measures aimed at preventing and detecting problem gaming, mitigating the harm regarding risky behavior and encouraging customers to take a responsible approach when it comes to gambling. Furthermore, it is a policy that contains codes of conduct that must be strictly followed by the Company and is structured with policies, procedures and control measures that WILLX N.V. has developed and implemented, taking as reference educational knowledge and international best practices in responsible gaming, in order to support Customers and comply with the regulations that establish the minimum requirements regarding Responsible Gaming.

1.1. Introduction

Online Gaming refers to the act of placing bets or wagers on games, sports, or events via the internet. It encompasses a variety of activities, including online casinos, poker rooms, and sports betting platforms, allowing individuals to gamble from the comfort of their residence.

Online gaming can serve as an engaging recreational activity and a way for players to connect socially. However, it is essential to recognize its potential risks — including online safety threats, exposure to toxic behaviour and excessive screen time, therefore It should never evolve into a full-time commitment.

WILLX N.V. is based on some strong principles regarding the idea that this sector is sustainable only if the context in which it is conducted is healthy and controlled.

The Company encourages and participates in plans that fight against illegal gaming and companies and people that do not comply with the appropriate regulations for the sector relating to Responsible Gaming.

It is important for players to be aware of the potential social and financial risks associated with problem gambling. Moreover, they also need to be aware that games of chance involving money can lead to losses, and gambling can become addictive if not kept under control.

WILLX N.V. encourages all users to gamble responsibly and in moderation.

If players are concerned about gambling habits, support is available. They can reach out to specialist organizations such as [GamCare](#) or [GambleAware](#), confidential help and advice.

1.2. Principles of Responsible Gaming

As an Operator in a regulated sector, WILLX N.V. sustain a strong commitment to society and the well-being of its customers. It is for this reason that the Company develops the relevant mechanisms to protect its users and remains cautious to the risks that may be associated with

risky gambling practices, such as addictions or the placing of bets that are financially unfeasible.

The Company considers it is essential to create a culture of prevention and knowledge that raises awareness around potential gambling disorders.

In this regard, WILLX N.V is taking action on the promotion of campaigns and preventive actions that encourage Customers to take an assessable approach to gambling.

In addition, WILLX N.V provides mechanisms for Customers to view gaming as a social entertainment activity that can be shared with friends and family.

WILLX N.V prohibits underage individuals/ vulnerable persons from accessing or using the Website. To help enforce this policy, the company implements several protective measures, including KYC (Know Your Customer) procedures.

In addition to this, our Company support parents and guardians in preventing minors from accessing gambling-related content. One effective way to do this is by using internet filtering software such as Net Nanny, CYBERsitter or Internet Content Rating Association. These programs allow:

- Block access to specific websites, including ours
- Schedule and limit the children's internet usage
- Monitor and record the websites the children's visit during their online sessions

1.3. Definitions

- **Responsible Gaming:** This term refers to principles and practices aimed at preventing and addressing reckless behavior around Gaming, in order to protect vulnerable groups.
- **Self-exclusion:** is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator. That self-exclusion should apply across all domains and brands operated by the same operator.
- **Cooling Off Period** means a pre-determined period that can comprise hours, days or months which is set by the player during which time the player may not place any wagers whatsoever.
- **Vulnerable Person:** is defined in the Clause 1.1 (h) of the LOK as Under eighteen years of age; Has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people; Has been banned from playing any Game of Chance either by force or at his or her own request; Has been declared bankrupt.
- **Problem Gambling:** a Customer who gambles frequently or even daily, usually spending an amount of money that, on occasion can be excessive, such as causing problems for them. This problem can develop over time, and individuals may continue gambling despite the harm it causes. People with such issues may experience symptoms such as: a strong need to gamble or difficulty resisting the need to gamble; Chasing losses (continuing to gamble in an attempt to recover lost money); Financial difficulties due to gambling debts; Neglecting personal relationships, work, or other important

activities; Feelings of guilt or anxiety related to gambling; Spending excessive time gambling, often to the detriment of other life areas.

2. Information Availability

The operator is committed to ensuring that all Customers have clear and unrestricted access to essential information regarding Responsible Gaming and operational policies. A dedicated Responsible Gaming Section is maintained and prominently accessible across all platforms, alongside clear references in the Terms & Conditions, homepage links, and footer information.

Particular emphasis is placed on **Age Verification and access controls**, with robust measures implemented to prevent **vulnerable persons** from accessing the platform. This framework reinforces transparency, regulatory alignment, and ensures that Customers fully understand the policies and protections in place when engaging with the operator.

3. Responsible Gaming Measures

WILLX N.V is committed in promoting responsible gaming and provide several measures to help Players manage or limit their gambling activities on the Website.

3.1.SELF-EXCLUSION

SELF-EXCLUSION allows Customers to block access to their account for a specified period. Self-Exclusion is designed as a permanent measure for the selected period and cannot be revoked prior to its expiry.

a) How it works

Customers may currently request Self-Exclusion by contacting the Customer Support Team. The following durations are available:

- 1 year
- 3 years

All requests are processed by the Customer Support Team and take effect immediately upon confirmation.

The operator, in line with its commitment to regulatory compliance and to providing a safe environment for its Customers, is currently developing a mechanism allowing Customers to submit and manage Self-Exclusion requests directly through their player account. Customers and the relevant authority will be notified once the system becomes fully operational through an update of this policy.

b) Effect of Activation

Upon activation, the following restrictions shall apply immediately and remain in place for the entire duration of the selected period:

- The Customer account is closed and login access is disabled.
- All gambling activity is blocked.
- Deposits will not be possible during this period. Withdrawals remain allowed.
- Marketing and promotional communications are automatically disabled.
- Any antepost bets placed after the Self-Exclusion request and prior to its activation shall be voided, with funds returned to the Customer.
- Ongoing tournaments must be completed.
- Jackpot contributions made prior to Self-Exclusion remain valid in the prize pool, but the Customer is no longer eligible to participate.
- Measures must be in place to prevent the creation of duplicate accounts or circumvention through alternative payment methods.

c) End of the Self-Exclusion Period

Self-Exclusion shall not be considered equivalent to a Cooling Off Period and does not produce the same operational effects. It is irreversible for the entire selected duration.

3.2.COOLING OFF PERIOD

Cooling Off Period enables Customers to temporarily suspend access to gaming activity for a short period of their choice. This mechanism is intended to support responsible gambling behavior by allowing Customers to take a voluntary break from gaming without initiating a full account closure or a formal self-exclusion. The Cooling Off Period does not constitute a Self-Exclusion and does not produce equivalent operational or legal effects.

a) How it works

Customers wishing to take a short break from gambling may request a Cooling Off Period by contacting the Customer Support Team. The following durations are available:

- **24 hours**, or
- **7 days**.

If these options do not meet the Customer's needs, a Cooling Off Period of **up to 3 months** may also be requested and applied accordingly.

b) Effect of Activation

Once the Cooling Off Period is activated, the following restrictions take immediate effect and remain in place for the full duration:

- The Customer may still log in to their account.
- Deposits and wagering are disabled.
- Withdrawals remain permitted.
- **Antepost bets** remain active.

- Any **ongoing poker tournaments** must be completed.
- No bonuses, free play, or incentives may be offered or requested during the cooling-off period.
- If the Customer has opted out of marketing, no promotional materials will be sent during this period.

c) End of the Cooling Off Period

- The account will be automatically reactivated once the Cooling Off Period expires.
- No action is required from the Customer to resume normal activity.

d) Cooling Off Period Adjustment

In the event the Player requests an adjustment to the Cool Off period, the following scenarios will apply:

- **Extensions:** A request to extend the period will take **immediate effect**.
- **Reductions:** A request to shorten the period can only be processed **after a minimum of 24 hours** have passed since activation, unless the current period is due to expire within that timeframe, in which case no adjustment is made.

4. Marketing & Promotions

The operator is focused on ensuring that all marketing and promotional activities are carried out responsibly, with a clear emphasis on protecting **vulnerable persons** and supporting Responsible Gaming principles. Marketing communications are designed to be transparent, easy to understand, and aligned with customer protection objectives.

Promotional offers and bonuses are structured to be clear, with terms and conditions presented in a straightforward manner, ensuring customers can make informed decisions. All third parties involved in marketing, are expected to operate under the same standards and Responsible Gaming framework.

This approach reflects the operator's commitment to transparency, customer protection, and regulatory alignment in all marketing and promotional activities.

5. Training

Training Content- All employees, receives (when necessary/ on a annual basis) updated training on responsible gambling with content including, but not limited to:

- Definitions of common responsible gambling key terms
- Basic principles about gambling
- The company's responsible gambling policies and strategy
- The role each staff member/department plays in contributing to player protection and harm reduction
- Available responsible gambling tools/ procedures (including Limit setting, Self-exclusion/Cool off, Behavior tracking, Reality Check etc.)
- Signs /triggers of problem gambling

6. Behaviour Tracking Procedure

The purpose of it is to identify, monitor, and respond to patterns of play that may indicate problematic or harmful gambling behaviour. This procedure ensures early intervention, regulatory compliance, and enhanced player protection.

Behavior tracking refers to the monitoring of player activity to identify:

- Deposit and wagering frequency
- Extended play sessions
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation.
- Setting or changing deposit or loss limits or repeatedly making use of cooling-off period.
- High-risk play patterns linked to problem gambling.

Behavioral data may include the following categories/ indicators:

- Account & Interaction Data
- Gameplay Behaviour
- Responsible-Gambling interactions

Behavioural Data Use:

- Responsible Gambling:

Behavioural data may be processed to identify gambling patterns; account review; recommend or enforce responsible-gambling measures.

Player activity markers may include the following:

Financial Markers:

- ✓ Rapid increase in deposit frequency or volume
- ✓ Multiple failed deposits or declined payments
- ✓ Using multiple payment methods in short time
- ✓ Multiple declined transactions due to insufficient funds

Time-Based Markers:

- ✓ Extended play sessions

Gameplay Behaviour:

- ✓ Increasing volatility preference (switching to games)
- ✓ Cancellation of withdrawals

Emotional & Communication Indicators:

- ✓ Messages to customer support indicating stress, urgency, or financial hardship
- ✓ Aggressive or desperate language

Account activity behavior:

- ✓ Repeated requests to remove limits
- ✓ Frequent changes in regard to the available limits displayed
- ✓ Repeated adjustments to Responsible Gaming controls, including frequent changes to deposit limits
- ✓ Attempts to create multiple accounts to circumvent available limits

7. Limits

7.1 Deposit Limits

Purpose and Scope

Deposit limits are a key responsible gaming measure used by the Casino to help players manage potential gambling-related harm. The Casino may impose restrictions on players' ability to make deposits into their accounts whenever it deems such measures appropriate.

Deposit limits represent a responsible gaming mechanism that may be applied by the Casino in order to mitigate potential gambling-related harm.

Once the deposit limit has been set, no further deposits may be made until the restriction no longer applies.

8. Player Self-Assessment Measures

Player Self-Assessment is a voluntary measure provided by the Company that allows players to evaluate their own gambling behavior. It is a structured questionnaire designed to help players recognize early signs of risky or problematic play.

The goals of the Player Self-Assessment measure can be described as the following:

- ❖ Increase player awareness of gambling habits
- ❖ Identify risky behavior early
- ❖ Guide players toward safer limits

- ❖ Encourage use of protection tools (limits, cooling-off, self-exclusion)

The area that can be covered via the Self-Assessment Questionnaire can be identified in the following areas: Financial Control, Time Spent Gambling, Emotional Signals, Behavioral Changes, Loss of Control.

The above signs/ indicators will be assessed as per the indications below:

- I am spending too much
- I've been losing a lot of money
- I play too much and cannot stop
- I do not have money to pay bills, buy food, or feed children
- I don't want to be tempted anymore.
- Please make it impossible for me to come back.
- I have spent too much money and now I cannot pay my bills, and it affects my daily life
- I played my entire salary
- I am spending my children's money
- I'm losing/starting to lose control

The below Player Self-Assessment Questionnaire is a responsible gaming measure designed to help players evaluate their gambling behavior and identify potential risk indicators. The questionnaire promotes informed decision-making, early awareness of harmful patterns, and the use of available responsible gaming tools.

1. Have you ever felt you should cut down on your gambling?
2. Have people annoyed you by criticizing your gambling habits?
3. Have you ever felt guilty about your gambling?
4. Has your gambling ever caused you any health problems?

The interpretation of the Player Self-Assessment Questionnaire results is intended to provide players with informational feedback regarding their gambling behavior and to encourage the use of responsible gaming tools where appropriate.

The method of interpretation can be described as the following: Interpretation is designed to be clear, neutral, and non-judgmental; Responses are evaluated using a standardized scoring framework; the Casino does not draw conclusions regarding problem gambling or gambling disorder.

- If all the answers are “**No**” - Low risk for gambling problems.
- If the answer is ‘**Yes**’ to only 1 of the questions - Moderate risk; further assessment may be required.
- If the answer is 'Yes' to at least 2 questions - High risk; further evaluation and intervention, use available account controls to limit or suspend gambling activity.