

Responsible Gaming Policy

Luxsoft N.V.



(SMES) Solutions for Management and Employment Support N.V.

Managing Director

14.11.2025

Version Control

Prepared By	Approved By	Revision Number	Approval Date
Luxsoft N.V.	Mr. Anatolii Snehirov – UBO	1	12/11/2025

Table of Contents

1 Introduction	4
2 Definitions	4
3 Responsible Gambling Oversight and Implementation	5
4 Preventing Underage Gambling	6
5 Player Information and Responsible Gaming Resources	7
6 Player Behavior Monitoring and Intervention	9
6.1. <i>Structured Intervention Protocol</i> 11	
6.2. <i>No Misuse of Interventions:</i> 12	
6.3. <i>Follow-Up and Ongoing Support:</i> 12	
7 Player Limits and Self-Exclusion Programs	13
7.1. <i>Deposit Limits</i> 13	
7.2. <i>Reality Checks</i> 14	
7.3. <i>Cooling-Off Periods</i> 15	
7.4. <i>Self-Exclusion Program</i> 16	
8 Responsible Advertising and Marketing	19
9 Employee Training	21
9.1. <i>Core Topics Covered:</i> 21	
10 Monitoring, Review, and Continuous Improvement	23

1 Introduction

Luxsoft N.V. (We, Company) is committed to fostering a safe, fair, and enjoyable gaming environment for all players. This Responsible Gaming Policy outlines the measures we have implemented to prevent problem gambling and protect vulnerable individuals, in full compliance with the Curaçao Gaming Authority (CGA) requirements and the National Ordinance on Games of Chance (LOK). Gambling is intended as a form of entertainment – not a means of financial gain – and we strive to ensure that players remain in control of their gaming activity.

Key principles of our policy include:

- **No Underage Gambling:** Only individuals aged 18 or older are permitted to play. We strictly prohibit minors from gambling on our platform and enforce robust age verification measures.
- **Player Protection:** We provide tools and information to help players gamble responsibly, such as self-assessment quizzes, personal limit setting, cooling-off periods, and self-exclusion programs. These resources empower players to manage their gaming behavior and seek help if needed.
- **No Credit Policy:** Luxsoft N.V. does not offer credit for wagering. All play must be funded by the player's own deposits. Extending loans or credit lines for gambling is against our policy and regulatory guidelines.
- **Responsible Marketing:** Our advertising and promotions are designed to be ethical and do not target minors or vulnerable persons. All marketing materials include responsible gambling messages and avoid any misleading or exploitative content (detailed in a later section).
- **Continuous Improvement and Compliance:** We adhere to all CGA responsible gaming regulations and will update our practices as needed. This policy is reviewed regularly for effectiveness and any material changes will be reported to the CGA. Luxsoft N.V. understands that compliance with responsible gambling measures is a condition of our license and critical to our mission of consumer protection.

2 Definitions

For the purposes of this policy, the following definitions apply:

- **Minor:** An individual under the age of 18.

- **Vulnerable Persons:** Persons who are at heightened risk of gambling-related harm. This includes minors, individuals who have lost control over their gambling behavior (e.g. problem gamblers), those who have self-excluded or been banned from gambling, or others identified by law or circumstances as vulnerable.
- **Responsible Gambling (RG):** The practice of making informed decisions to gamble in a controlled manner such that the risk of harm is minimized. It involves operators providing safe environments, tools for self-control, and assistance to players, as well as players gambling within their personal limits for entertainment rather than as a source of income.
- **Cooling-Off Period:** A short-term, temporary break from gambling that a player can initiate for themselves. During a cooling-off period, the player's account is suspended for gameplay for a specified duration (hours, days, or months), after which it reactivates automatically. This is intended to help players "take a breather" and regain perspective if they feel the need to pause gambling.
- **Self-Exclusion:** A long-term or indefinite exclusion from all gambling activities with Luxsoft N.V. that a player initiates. While self-excluded, the player cannot access their account to gamble for the duration of the exclusion. Luxsoft N.V.'s self-exclusion has a minimum period of one year in line with CGA requirements, and reactivation after the period is not automatic – the player must request to return (details below).
- **Responsible Gaming Officer (RGO):** The designated individual at Luxsoft N.V. responsible for implementing and overseeing this Responsible Gaming Policy. (In absence of a dedicated RGO, these duties are fulfilled by a Compliance Officer not also handling AML/CFT.) The RGO/ Compliance Officer ensures all measures in this policy are carried out, reports to management on the policy's effectiveness, and liaises with regulators as needed.

3 Responsible Gambling Oversight and Implementation

Luxsoft N.V. has appointed a dedicated official to oversee responsible gambling initiatives and compliance. This Responsible Gaming Officer (RGO) is charged with implementing the provisions of this policy across our operations.

The RGO's duties include:

- **Policy Implementation:** Ensuring that all departments (e.g. customer support, marketing, IT, operations) understand and execute the responsible gambling measures outlined in this document. The RGO coordinates the integration of age verification systems, self-exclusion tools, monitoring programs, staff training, and other controls into our platform and procedures.

- **Monitoring and Reporting:** The RGO (or designated Compliance Officer) monitors the effectiveness of our responsible gambling measures on an ongoing basis. At least once every 12 months, the RGO will produce a comprehensive report to Luxsoft N.V.'s executive management evaluating the performance of this policy. The report will include data on usage of responsible gaming tools, any incidents or interventions, and recommendations for any improvements to better protect players.
- **Continuous Improvement:** Based on the annual review and emerging best practices, the RGO will recommend operational or policy enhancements to strengthen player protection. Luxsoft N.V. management is committed to acting on these recommendations where feasible.
- **Regulatory Compliance:** The RGO ensures Luxsoft N.V. meets all responsible gaming obligations under the LOK and CGA guidelines. This includes maintaining up-to-date knowledge of regulations, submitting this policy and any updates to the CGA portal, and cooperating fully with any CGA audits or inquiries. We maintain detailed records of all age verification checks, player interventions, self-exclusions, and other RG actions, and will provide these to regulators upon request.
- **Staff Accountability:** The RGO serves as a point of contact for staff to report any responsible gambling issues or suggestions. All Luxsoft N.V. employees are expected to support the implementation of this policy and promptly escalate any concerns (such as suspected underage players or signs of problem gambling) to the RGO or management.

By assigning clear responsibility and oversight for our responsible gambling program, Luxsoft N.V. ensures that these critical consumer protection measures are actively managed and continuously upheld. Management fully supports the Responsible Gaming Officer in enforcing this policy across all levels of the Company.

4 Preventing Underage Gambling

Preventing access by minors is one of Luxsoft N.V.'s top priorities. We strictly enforce an 18+ policy on all our platforms and take robust measures to verify the age of our customers. Our approach to underage gambling prevention includes:

- **Rigorous Age Verification:** At registration, all players must provide their date of birth and confirm that they are over 18 years old. Luxsoft N.V.'s system will not allow any account to be created without this confirmation. We then employ additional age verification checks to ensure the player is an adult. These checks include the submission and verification of government- issued identification documents (such as a passport, national ID, or driver's license) and other methods as needed to gain sufficient certainty of the player's age. Prior to a player's first withdrawal (and sooner if triggered by our risk rules), a valid photo ID verification is mandatory. If our verification process finds any player to be underage, we will immediately close the account.

- **Consequences of Underage Gambling:** In the event an underage individual manages to register or gamble, Luxsoft N.V. will take immediate action upon discovery. The account will be closed and the individual will be informed of the reason. In accordance with legal obligations, any remaining deposits will be returned to the minor, and any winnings will be forfeited. We will also evaluate whether further steps (such as informing relevant authorities or parents/ guardians) are appropriate in each case. Luxsoft N.V. clearly communicates these consequences to all users: anyone below 18 found gambling on our site will lose any winnings and be refunded their deposits as required by law.
- **Record-Keeping:** We maintain secure records of every age verification check and its outcome. This includes logs of identity documents reviewed, age verification services used, and any incidents of underage account closures. These records serve to demonstrate our compliance and can be audited by the CGA or other authorities at any time.
- **Site Messaging and Visual Indicators:** Our websites prominently display notices that underage gambling is prohibited. For example, the footer of every page includes an "18+" age restriction icon or text and a statement that minors are not allowed to gamble. We also include this warning in our Terms & Conditions and at points of access to real-money games. Company's marketing materials likewise carry clear 18+ warnings.
- **Parental Controls and Internet Filtering:** Luxsoft N.V. is aware that underage individuals might attempt to access gambling sites on shared devices. To support parents and guardians in preventing this, we recommend the use of third-party internet filtering tools, such as BetBlocker (betblocker.org), GamBlock (gamblock.com), or Gamban (gamban.com) which can block gambling sites on specific devices. We advise customers to use these tools on any devices accessible to minors, and to keep account credentials secure. Luxsoft N.V. also encourages parents to educate minors about the illegality and risks of underage gambling.

By combining strict age verification protocols with prominent warnings and parental support tools, Luxsoft N.V. seeks to create multiple barriers that prevent anyone under 18 from accessing our gambling services. Underage gambling is not only against our policy – it is against the law – and we enforce zero tolerance in this area.

5 Player Information and Responsible Gaming Resources

Luxsoft N.V. believes that an informed player is better equipped to gamble responsibly. We provide easily accessible information about responsible gaming and offer various tools for players to manage their gambling activity. Key aspects of our player-facing resources include:

- **Dedicated Responsible Gaming Section:** Our website features a distinct Responsible Gaming (RG) section that is clearly identifiable and accessible at all times. A direct link to the RG section is always available on the homepage (e.g. in the main menu or footer) so that players can find help quickly. The RG section is available in English and in the primary language(s) of our target markets, ensuring broad accessibility; if any content differs between languages, the English version will prevail for accuracy.
- **Educational Content:** The Responsible Gaming section contains straightforward, easy-to-understand information to help players make informed choices. We explain what responsible gambling means, outline common signs of problem gambling, and provide practical tips for maintaining control (such as setting budgets or time limits). The information is presented in a clear, non-judgmental tone and is updated periodically to remain current.
- **Tools and Self-Help Resources:** Our RG section includes direct access to all the responsible gambling tools that Company offers. Players can easily find links or settings to do the following, without needing to contact customer support: set deposit limits, initiate a cooling-off period, request self-exclusion. Each tool is explained in plain language, including what it does and how to use it. We also provide answers to frequently asked questions about these tools to encourage their use.
- **Account History and Activity Statements:** We empower players to review their own gambling activity. At any time, Luxsoft N.V. player can access a detailed record of their betting and transaction history for at least the past six (6) months. Longer history records can be provided on request, within 10 working days for requests beyond six months. By transparently offering account statements, we enable players to self-reflect on their gambling habits and detect if their spending is increasing to uncomfortable levels.
- **Self-Assessment Questionnaire:** Luxsoft N.V. encourages players to regularly assess their gambling habits. We offer a confidential self-assessment quiz on our Responsible Gaming page to help players determine whether their gambling remains within healthy limits. The quiz consists of a series of questions about gambling behavior and its impact. For example, we provide the well-known 20-question problem gambling test from Gamblers Anonymous, which asks players about signs of loss of control, dishonesty about gambling, financial problems caused by gambling, etc. Based on the number of "yes" answers, players can gauge whether they might be at risk of problem gambling. After the quiz, guidance is provided on interpreting the results and advice on next steps. If a player's self-

assessment indicates potential risk, we clearly recommend they consider using our responsible gaming tools or seek professional help.

- **Direct Support and Contact Information:** The RG section displays information on how players can contact Luxsoft N.V. for help with responsible gambling questions or to request any protective measure. We provide a dedicated support email and a customer support hotline/ live chat specifically for responsible gambling issues. Trained support agents are available to assist with enabling account limits, processing self-exclusion requests, or connecting players with external counseling services. We encourage players to reach out if they feel their gambling is getting out of control or if they just need advice on using our tools.
- **External Help Links:** In addition to our internal resources, Luxsoft N.V. prominently features links and contact details for reputable problem gambling support organizations. In the footer of our site (and in the RG page), players can find direct links to international support groups like GamCare, Gamblers Anonymous, GambleAware, and others. Where available, we also list local helplines or support services for the regions we serve, so that players can seek help in their native language or local context. All advertising and marketing by Luxsoft N.V. similarly include a responsible gambling message or slogan (e.g., "Gamble Responsibly – 18+") to reinforce awareness.
- **Terms and Conditions Integration:** Luxsoft N.V.'s player Terms & Conditions explicitly reference our Responsible Gaming Policy and tools. The T&Cs (which are always easily accessible from our homepage within one click) remind players of the availability of deposit limits, self- exclusion, and other measures, and how to use them. By embedding these references in the binding agreement with players, we ensure that every customer is informed about responsible gambling from the moment they sign up.

Through these measures, Luxsoft N.V. aims to make information and help readily available. We want players to understand that support is always at their fingertips and that responsible gambling is a shared priority between Luxsoft N.V. and its customers. We will continue to improve our player information channels, keeping them clear, up-to-date, and accessible to all.

6 Player Behavior Monitoring and Intervention

Luxsoft N.V. employs active behavior tracking and intervention protocols to identify players who may be exhibiting signs of problematic gambling and to intervene before harm occurs. Our goal is to detect risky behavior patterns early and offer help (or impose protections) in

a timely and sensitive manner. The key components of our monitoring and intervention strategy are:

- **Automated Monitoring Systems:** We use advanced monitoring tools within our Player Account Management system to continuously analyze player activity for red flags. Our systems track a variety of Key Risk Indicators that might suggest problematic gambling, such as: repeated failed deposit attempts or declined payments, frequent cancelled withdrawals (i.e. players withdrawing winnings then quickly reversing the withdrawal to continue gambling), unusually long or late-night gaming sessions without breaks, abrupt increases in deposit size or betting frequency, high amounts of money spent in a short time, signs of financial distress (e.g. maxing out a credit card on the site), opening multiple accounts to bypass limits, or frequent changes to limits and self-exclusion status (indicating potential loss of control). We recognize that no single factor definitively labels someone a problem gambler, but multiple indicators over time can build a risk profile. Our monitoring algorithms use a risk-scoring model to flag accounts that exceed certain thresholds or combinations of these indicators.
- **Staff Awareness and Manual Monitoring:** In addition to automated alerts, our customer-facing teams (customer support, VIP managers, etc.) are trained to observe and report any direct interactions that raise concern. Often, frontline staff may notice emotional distress signals or receive unusual requests from players (for example, players asking for bonuses or concessions while sounding desperate or agitated). We have internal protocols for staff to log and escalate such observations to the Responsible Gaming Officer for further review. By combining automated data analysis with human insight, Luxsoft N.V. maintains a comprehensive view of player behavior.
- **Player Risk Profiling:** Luxsoft N.V. maintains a profile for each player's gambling behavior that compiles relevant data to assess risk level. This profile may include deposit and loss patterns, frequency and duration of play, use of responsible gaming tools, contact with support regarding gambling issues, etc. We adopt a risk-based approach wherein players with higher risk scores are subject to enhanced monitoring and quicker intervention. All responsible gambling interactions or incidents (whether initiated by the player or by us) are documented in the player's profile, along with the observed indicators and actions taken. These records ensure continuity – for example, if a player has a history of setting limits or receiving warnings, our staff will be aware of it in future interactions.

Luxsoft N.V. has a clear, step-wise intervention process for players identified as exhibiting at-risk behavior. The level of intervention is scaled to the severity of the observed issues and the player's responsiveness. Our intervention framework includes:

- **Initial Outreach** – Education and Encouragement: At early signs of problematic behavior, we will reach out to the player with a friendly, proactive communication. This may be an automated in-game pop-up or a personalized email reminding the player of the available responsible gaming tools (such as deposit limits, cooling-off, or self-exclusion) and encouraging their use. The message is supportive in tone, for example: "We've noticed you have been playing for a long session. Remember, you can set a deposit or time limit or take a short break at any time. We're here to help if you need any support." These notifications include direct links for the player to easily activate the tools or to contact a Luxsoft N.V. Responsible Gaming specialist for assistance. At no point do we mention anything that could be seen as encouraging continued play; the focus is purely on help and information.
- **Personalized Intervention** – Direct Contact: If risky patterns persist or if our systems flag serious indicators (for instance, multiple signs of distress or a dramatic change in gambling behavior), Luxsoft N.V. will initiate direct intervention by a trained staff member. A designated Responsible Gaming team member or manager will reach out to the player via email, phone, or live chat as appropriate. In this conversation, the staff member will express concern in a respectful manner, discuss the observed behavior, and strongly advise the player to consider specific actions (like setting stricter limits or self-excluding). The player will be guided through the tools available and also pointed toward external support (e.g., professional counseling services), reinforcing that help is available. The communication will clearly reference our Responsible Gaming resources and encourage the player to utilize them. For example, we might say: "You mentioned feeling stressed about your gambling. We recommend you take a break and use our self-exclusion option. We can assist you with that right now. Also, organizations like Gamblers Anonymous can provide help – here's their contact info."
- **Mandatory Interventions** – Imposed Limits or Exclusions: If a player does not respond to initial outreach and continues to exhibit signs of severe problem gambling, Luxsoft N.V. may escalate by imposing protective measures even if the player has not specifically requested them. Depending on the situation, these measures can include: applying a mandatory deposit or loss limit on the account to restrict further spending, or temporarily suspending the account (a forced cooling-off) pending the player's agreement to responsible gambling measures or further evaluation. Such actions are not taken lightly – we will make multiple

attempts to contact and work with the player first. However, our policy empowers us to act in the player's best interest when clear risk of harm is present. We will inform the player of any imposed restrictions and the reasons for them, and provide

guidance on next steps (such as how to formally enter a self-exclusion program or seek help).

- **Last Resort – Self-Exclusion & Account Closure:** In cases where a player's gambling behavior is deemed out of control or poses a serious safety concern, or if the player engages in fraud/other prohibited conduct, Luxsoft N.V. reserves the right to permanently exclude the player from our platform. An operator-initiated exclusion (banning the player) is considered a last resort measure for the most severe cases, such as evidence of gambling addiction that is not abating or detection of criminal activities (e.g. money laundering, use of stolen payment methods). We will document the justification for any such exclusion in detail and keep these records for at least five years for regulatory review. Importantly, Luxsoft N.V. will never exclude or penalize a player solely on the basis of large wins or frequent withdrawals. We only intervene in ways that restrict play when there are genuine responsible gambling concerns or legal issues.

6.2. No Misuse of Interventions:

Under no circumstances will Luxsoft N.V. use responsible gambling measures as a pretext to inhibit player rights inappropriately. For example, we will never use an alleged "responsible gambling" concern to block or delay a legitimate withdrawal request or to selectively target profitable players. All interventions are solely aimed at player protection and are carried out with integrity. Any misuse of these protections for financial gain or other ulterior motives would not only violate our ethos but also breach CGA license conditions. We maintain internal checks to ensure that any account limitations or closures are backed by documented responsible gambling rationales or clear evidence of policy violations.

6.3. Follow-Up and Ongoing Support:

After any significant intervention, Luxsoft N.V. continues to monitor the player's account closely. If the player resumes activity (for example, after a cooling-off period ends or a limit period resets), our team may follow up with the player to check in on their experience and remind them of available tools if necessary. Should the player's behavior improve (risk indicators decrease), we will scale back the intensity of monitoring accordingly, but the player will remain flagged for a period of time in case of relapse. Conversely, if problems persist or worsen, we will escalate to the next level of intervention as described above. Our aim is to create a feedback loop where players who struggle with control receive timely assistance and those who respond well to interventions can continue playing more safely.

Through these measures, Luxsoft N.V. works to identify vulnerable players and offer help as early as possible. By holistically analyzing each player's relationship with our platform (gameplay data and personal interactions), we strive to distinguish between recreational patterns and those that may indicate harm. This structured approach to

behavior tracking and intervention is a cornerstone of our responsible gambling efforts. We recognize the privacy and dignity of our players throughout this process, treating all interactions with care and confidentiality. If a player indicates that they are experiencing issues, we stand ready to support them in taking whatever actions are necessary for their well-being.

7 Player Limits and Self-Exclusion Programs

Empowering players to set limits on their gambling is a fundamental part of Luxsoft N.V.'s responsible gaming strategy. We offer a range of self-imposed limit options, as well as temporary and permanent self-exclusion mechanisms, to help players manage their gambling participation. All these options are available through the Responsible Gaming section of our site or by contacting customer support. Luxsoft N.V. ensures that these tools are easy to use and effective, and we adhere to all CGA requirements regarding their functionality. The following limits and exclusion programs are in place:

7.1. Deposit Limits

Players at Luxsoft N.V. can set financial limits on the amount of money they deposit into their account, helping them control their spending. Deposit limits can be configured on a daily, weekly, or monthly

basis according to the player's preference. The player can specify an absolute cap (in the account's currency) for the chosen time period, and once this cumulative deposit amount is reached, no further deposits will be accepted until the period resets. For example, a player might set a €100 weekly deposit limit; after depositing €100 in a given week, the player cannot deposit more until the start of the next week. Key details of our deposit limit system:

- **Immediate Enforcement:** Deposit limits take effect as soon as they are set and apply to all deposit channels on the player's account. Our system will automatically reject any deposit attempt that exceeds the remaining allowed amount for the period, informing the player that their deposit limit has been reached. The limit remains in place for that entire period (day, week, or month) and resets only when the period is over.
- **Adjusting Limits (24-Hour Rule):** Players are free to increase their deposit limits or make them more restrictive at any time, and such changes will be applied immediately. However, if a player attempts to decrease their deposit limit or remove

it, we enforce a waiting period of at least 24 hours before the higher limit takes effect. This "cool-down" period is a safeguard to prevent impulsive raising of limits. When a player requests to decrease the severity of a limit, we notify them of the 24-hour delay and require a confirmation after the time has elapsed. Only after

reconfirmation will the new, lower limit be activated. (Increasing a limit does not require reconfirmation and is effective without delay, as it only enhances protection).

- **Existing Balances and Wagers:** Deposit limits restrict further deposits but do not affect funds already in the account or bets already placed. Any wagers placed or pending prior to reaching the deposit limit are not canceled or voided due to the limit.
- **Awareness and Encouragement:** The Responsible Gaming page and our help guides explain how deposit limits work and suggest that players choose a comfortable limit to match their budget. Players can also contact our support team for assistance in deciding on an appropriate limit.

7.2. Reality Checks

To further support mindful play, Luxsoft N.V. has implemented a "Reality Check" feature on our platform. Reality checks are periodic notifications and information displays designed to keep players aware of their activity during a gaming session. They serve as gentle reminders of time spent and money wagered, helping players stay cognizant and avoid losing track of time or budgets. Our reality check mechanism includes the following elements:

- **On-Screen Time Alerts:** A real-time session timer is always visible in the game interface or player dashboard while logged in. For example, a clock or timer might show "Session Length: 1h 30m" and continue to update. This gives players an immediate sense of how long they have been playing. Additionally, the current local time is always displayed (adjusted to the player's time zone) so that players are aware of the actual time of day.
- **Periodic Pop-Up Reminders:** At regular intervals (e.g., every 30 minutes or 1 hour, depending on the jurisdiction or the player's settings), an automated pop-up message will appear during gameplay to remind the player of how long they have been playing and optionally their current wins/losses in that session. The content of these messages is clear and informational – for instance, "You have been playing for 1 hour. Your net result this session is +€20. Please consider taking a break if needed." The player must acknowledge the message by clicking "OK" before they can continue playing, which causes a brief interruption that prompts reflection.
- **Customizable Alerts:** Luxsoft N.V. allows players to customize certain aspects of the reality check feature. Players may choose the interval for pop-up reminders (with a default set by us if they don't choose).
- **Mandatory Acknowledgment:** When a Customised Reality Checks is displayed, gameplay is temporarily paused until the player confirms they have read the message. This ensures the player takes notice of the information. The messages clearly indicate key data like time played and can also show the player's running

winnings or losses during the session. We encourage the player to honestly evaluate their state (e.g., fatigue or chasing losses) at each checkpoint.

Reality checks are enabled by default for all players in jurisdictions that mandate them, and are available to all Luxsoft N.V. players as a best practice feature. The format of reality check notifications comply with any local regulatory requirements. By implementing reality checks, Luxsoft N.V. helps players stay self-aware, which is an important aspect of preventing problem gambling.

7.3. Cooling-Off Periods

A Cooling-Off period is a short-term, voluntary break from gambling that Luxsoft N.V. makes available to any player at any time. Unlike self-exclusion (which tends to be long-term), cooling-off is designed for players who feel they need a temporary pause to cool down or refocus. The key characteristics of Luxsoft N.V.'s cooling-off option are:

- **Easy Activation:** Players can activate a cooling-off period through their account settings in the Responsible Gaming tools, or by contacting customer support. The player can select the duration of the cooling-off from the preset options we offer. We provide a range of durations (for example: 24 hours, 48 hours, 1 week, 2 weeks, 1 month, or a custom period up to a few months). The minimum cooling-off duration is 24 hours, in accordance with CGA guidelines, meaning a player cannot choose anything shorter. This ensures the break is meaningful.
- **Scope of Cooling-Off:** When a player activates cooling-off, his account remains active but with gambling features disabled. The player will be logged out of any active sessions and will not be able to place bets or play any games until the cooling-off period expires. Depending on player preference, the cooling-off can apply to all Luxsoft N.V. products or, if the player specifies, to certain gambling verticals only (for instance, a player might block themselves from Casino games but not Sports Betting, although the default is all-encompassing). We also offer the option to apply the cooling-off across all brands under our Company for consistency, or only current brand.
- **Account Access During Cooling-Off:** During a cooling-off period, the player generally retains the ability to log in for limited purposes, such as withdrawing any remaining balance, but cannot initiate any new wagers or deposits. (If local law requires a complete lockout, we will follow that, but typically withdrawals are allowed so the player is not prevented from obtaining their funds.) Should the player attempt to log in and play, they will receive a notification that they are on a cooling-off and gambling is disabled until the date/time when the period ends.
- **No Cancellation or Reduction:** Once set, a cooling-off period cannot be prematurely terminated or shortened by the player or by Luxsoft N.V.. We do not allow "cancellation" of a cooling-off – the player must wait out the full duration. This

policy is clearly communicated at the time the player triggers the cooling-off. If a player has a change of heart and asks support to undo it, our team will respectfully deny the request and remind them that the cooldown is in their best interest. However, a player is free to extend a cooling-off or convert it into a longer self-exclusion if they wish additional time.

- **Marketing Opt-Out:** While a player is in a cooling-off period, Luxsoft N.V. will suspend all marketing communications to that player. They will not receive promotional emails, SMS, or notifications from us during the break. We want to ensure that we are not enticing the player back to gamble while they have consciously taken time off.
- **Automatic Reactivation:** After the cooling-off period expires, the player's account is automatically reactivated and they may resume gambling whenever they next log in. No further action is required from the player to restore access. We do not require a manual request for reactivation after a short cooling-off; the system lifts the restriction immediately once the time has elapsed.
- **Information and Encouragement:** We ensure players are well-informed about the difference between a cooling-off and the more serious self-exclusion option. When a player chooses cooling-off, we present information describing that it is a short-term timeout and suggesting that if they feel they have a gambling problem, a longer self-exclusion might be more appropriate. We do not influence the player to choose one option over the other for our benefit; rather, we encourage the option that best fits the player's needs. If a player self-identifies as struggling or "vulnerable," we will guide them towards self-exclusion directly.

The cooling-off tool is an important preventive measure. It often helps players avoid chasing losses or playing while emotionally charged. Luxsoft N.V. is supportive of any player's decision to take a break, and we strive to make that process frictionless and free of judgment.

7.4. Self-Exclusion Program

For players who need a longer-term or more serious intervention, Luxsoft N.V. provides a robust Self-Exclusion Program. Self-exclusion is a voluntary agreement by which Luxsoft N.V. will bar a player from accessing our gambling services for an extended period, typically because the player acknowledges a gambling problem or risk. The following outlines how our self-exclusion works:

- **Minimum Duration and Options:** The minimum self-exclusion term is one (1) year, in accordance with CGA's responsible gaming policy. Players may also choose longer durations, such as 2 years, 5 years, or an indefinite/lifetime exclusion. These options are presented to the player at the time of self-exclusion request. We emphasize that self-exclusion is intended for serious commitment to stopping gambling for a significant time; hence, it is not available for just a few days or weeks.

- **Coverage – All Products and Brands:** When a player self-excludes with Company, the exclusion applies to all gambling activities and services we offer. The player will not be able to place any wagers or play any games on their account once self-exclusion is activated. Additionally, all associated Luxsoft N.V. brands or websites under our license are included in the exclusion. We treat this as an “all-or-nothing” protection – a self-excluded player cannot simply migrate to another product we operate.
- **Process to Self-Exclude:** A player can initiate self-exclusion directly through the Responsible Gaming page by filling out a self-exclusion request, or by contacting Customer Support and indicating they wish to self-exclude. We will then promptly lock the player’s account and record the self-exclusion entry. During the process, the player is informed of the consequences and terms: that they will be unable to gamble or deposit, that any attempt to create new accounts during the period will be blocked, and that they will be opted-out of all marketing. We also inform them about resources for getting help with gambling addiction. After confirming their request, the self-exclusion is put into effect immediately.
- **Irreversibility:** Self-exclusion is irrevocable for the duration of the chosen term. Neither the player nor Company can override or shorten the exclusion once it’s in place. This is a critical aspect, as it prevents decisions made in the heat of the moment from being undone later when temptations resurface. For example, if a player opts for a 1-year self-exclusion, they are committed to staying away for at least one year. Luxsoft N.V.’s systems will not allow login or wagering, and support staff are instructed to not reinstate accounts under any circumstances until the time is fully served.
- **Account Management During Exclusion:** Upon activation of a self-exclusion, the player’s account is closed, and the player is no longer permitted to log in. Luxsoft N.V. implements robust measures to identify, where reasonably possible, duplicate accounts and to prevent self-excluded individuals from creating new accounts using different credentials. The Company acknowledges the potential civil law implications of self-exclusion, including the requirement to void and refund any ante-post bets placed prior to the exclusion taking effect, subject to applicable AML/CFT regulations. Players are permitted to complete any tournaments (e.g., poker tournaments) that are in progress at the time of self-exclusion. Contributions made by the player to progressive jackpots prior to the self-exclusion request remain in place; however, the player is no longer eligible to participate in the jackpot after the self-exclusion becomes effective.
- **Marketing and Communications:** As soon as self-exclusion begins, Luxsoft N.V. will cease all direct marketing towards that player. They will be removed from promotional mailing lists and will not receive targeted offers. We will also ensure that our affiliate partners cease any marketing to the self-excluded individual. The only communications the player may receive from Luxsoft N.V. during exclusion are

those necessary for administrative or account purposes (for instance, a confirmation of account closure or responses to any inquiries the player makes). We do not prompt or invite self-excluded players to return to gambling – doing so would violate our policy and regulatory mandates.

- **Reactivation After Exclusion:** At the end of the self-exclusion term, the player's account does not automatically reopen. Instead, the player must formally contact Luxsoft N.V. and request to be reactivated if they wish to return. This request must be in writing (for example, via email or a submitted form) to ensure there is a clear, documented record of the player's intention to resume gambling. If the player does not request reactivation, the account remains closed. Luxsoft N.V. will never reach out to a self-excluded player to suggest reactivation or prompt gambling; the initiative must come entirely from the player once the exclusion period is over. If a player chooses indefinite self-exclusion, the account will remain closed unless and until the player contacts us after a minimum period (often the jurisdiction sets a minimum, such as 5 years, before consideration for return).
- **Operator-Initiated Exclusion:** While self-exclusion is typically voluntary, our policy (as noted in the intervention section) also allows Luxsoft N.V. to exclude a player unilaterally if there is sufficient evidence that it is necessary for the player's welfare or for legal compliance. Examples include: if a player has been observed exhibiting severe gambling addiction behavior and has not self-excluded, or if a player threatens self-harm related to gambling, etc., we might invoke an immediate exclusion to prevent further harm. Similarly, if a player is caught using the platform for illicit activities (fraud, money laundering), we may exclude them as part of account closure. Any operator-initiated exclusion will be documented in detail as needed. The player will be informed of the exclusion and given information on how to seek help. Operator-initiated exclusions are not based on player profitability or winnings – we never use exclusion as a retaliation for winning players, only for legitimate responsible gambling or legal reasons.
- **Differentiating Self-Exclusion vs. Cooling-Off:** We make it clear to players the distinction between these two options. Self-exclusion is for serious, longer-term cessation of gambling and involves stricter conditions (e.g., one-way lock until player requests return), whereas cooling-off is a short-term pause with automatic return. Our support agents are trained to help players choose the option that best fits their situation. If a player seems unsure, we err on the side of caution – for instance, if they say "I really need to stop, I'm addicted," we would suggest self-exclusion rather than a short cooling-off.

8 Responsible Advertising and Marketing

Luxsoft N.V. is dedicated to conducting all advertising, promotions, and marketing in a socially responsible manner. We recognize that marketing has an impact on how gambling is perceived and we take care to ensure that our communications do not mislead, exploit, or target vulnerable individuals. Our marketing standards fully align with the CGA's guidelines for Consumer Advertising and Marketing. The following principles govern all Luxsoft N.V. marketing and advertising materials:

- **No Targeting of Minors or Vulnerable Groups:** Luxsoft N.V. will not direct any advertising or promotions towards minors (under 18) or any individuals who have self-excluded or been identified as vulnerable. Our marketing content – including imagery and language – is designed for adult audiences and never features minors or characters that might appeal primarily to minors (such as cartoon figures). We avoid placement of ads in media outlets or websites that are aimed at underage audiences. Furthermore, if a person is on our self-exclusion list or has shown signs of problem gambling, we actively block them from marketing campaigns.
- **Clear Responsible Gaming Message:** All Luxsoft N.V. advertisements include a clear and visible responsible gambling message or slogan. For example, our banner ads, social media posts, emails, and website promos typically include small print or a tagline stating “18+ Only” and “Play Responsibly” along with a link to our Responsible Gaming page or to a helpline number. We ensure this message is prominent enough to be noticed.
- **Honest and Non-Misleading Content:** We commit to truthful advertising. Luxsoft N.V. promotions will never misrepresent the nature of gambling or the chances of winning. We explicitly avoid any suggestion that gambling is a surefire way to make money or solve financial problems. We do not describe gambling as an investment or a way to achieve financial security. Any statements about odds, payouts, or jackpots in our materials are factual and include any relevant conditions or disclaimers.
- **Skill vs. Chance – No False Impressions:** Our marketing will not imply that skill can influence the outcome of purely chance-based games. We make clear distinctions in games where skill is a factor (like poker) versus games of pure chance (like slots), and we do not mislead players into thinking they can control or guarantee outcomes on games of chance. Similarly, we avoid language that suggests the more you play the better your chances, which could be misconstrued.
- **No Emotional or Social Pressure:** Luxsoft N.V. advertisements will not employ tactics that exploit people's emotions or insecurities. For instance, we do not suggest that gambling can be a solution to personal problems, boost self-esteem, or enhance one's attractiveness or social status. Our messaging does not use guilt or

shame, nor does it imply someone is “missing out” if they don’t gamble. We also strictly avoid content that might trigger those with gambling addiction – for example, we do not send urgent “last chance to bet” messages or anything that creates undue sense of hurry.

- **Avoiding Harmful Associations:** We ensure there is no linkage between gambling and other harmful behaviors in our marketing. For example, our ads will not depict or encourage excessive alcohol consumption, drug use, or smoking in conjunction with gambling. We steer clear of sexualized imagery or the suggestion that gambling will make someone more attractive or successful romantically. The overall tone is kept appropriate and not overly sensational.
- **No “Risk-Free” Misleading Offers:** If Luxsoft N.V. offers bonuses or free-play promotions, we describe them accurately with all essential terms. We do not use the term “free” in a misleading way (e.g., a “free bet” that actually requires a deposit or has strings attached will be clearly labeled with conditions). All bonus terms (wagering requirements, eligibility, expiration dates, etc.) are presented clearly alongside the offer, not buried in fine print. This transparency is crucial so players understand exactly what is being offered.
- **Bonuses Not to Encourage Excessive Play:** Our bonuses and loyalty rewards are structured to reward entertainment, not to fuel problematic play. We avoid any bonuses that may encourage players to chase losses or gamble more than they intended. For example, we do not issue repeated bonus offers to someone who has reached their limit or is on a losing streak. We also follow CGA’s guideline that bonuses must not be used to encourage excessive gambling. Any promotion that could be taken as urging a player to keep betting (like messaging around “win back your losses” or high roller challenges) is strictly prohibited in our marketing policy.
- **Placement and Medium:** Luxsoft N.V. will only advertise in channels that comply with relevant advertising laws and standards. We respect watershed times for gambling ads on television/ radio (if applicable) and use targeting filters for digital ads to exclude underage groups. We do not advertise in mediums where gambling advertising is banned or heavily regulated without following those rules (for instance, adhering to social media platform policies).
- **Third-Party Marketing Compliance:** We take responsibility for any third parties who market on our behalf, such as affiliate partners, advertising networks, or brand ambassadors/influencers. All affiliates and representatives are provided a copy of Company’s marketing guidelines and our Responsible Gaming Policy, and they are contractually required to adhere to the same standards. Luxsoft N.V. performs periodic reviews of affiliate marketing materials to ensure compliance. For example, if we partner with a social media influencer or sponsor, we ensure they do not make improper claims about gambling and that they include responsible gambling messaging as required. Any affiliate found targeting vulnerable persons or breaching our advertising code will be warned and potentially terminated.

Additionally, if we have sponsorships (e.g., of events or teams), we ensure that such sponsorships do not promote gambling to audiences where a significant portion is likely underage.

- **Regulatory Oversight:** As part of our licensing, Luxsoft N.V. understands that our marketing practices are subject to oversight by the CGA and other authorities. We have an internal approval process where all significant marketing campaigns are reviewed by compliance personnel to ensure they meet these responsible standards before release. In jurisdictions with advertising code requirements or where we must submit ads for approval, we comply fully. We promptly address any complaints or issues raised about our advertising.

By following these marketing principles, Luxsoft N.V. aims to promote its services in a manner that is ethical and compliant, while minimizing the risk of encouraging harmful gambling behavior. We want our players to join and stay with Company for positive reasons – because they enjoy the entertainment – not due to misleading promises or pressure. All promotional activities are framed with the well-being of our customers in mind. If at any point a player indicates they do not wish to receive marketing, we honor that immediately and without question. Our goal is to build a trusting relationship with our players, and responsible advertising is a key part of that commitment.

9 Employee Training

A strong responsible gambling program requires that our employees are knowledgeable and vigilant. Luxsoft N.V. invests in comprehensive staff training to ensure that all team members who interact with players (as well as those designing products or marketing) understand responsible gambling principles and know how to apply them in their roles. Key aspects of our training and staff responsibilities include:

- **Training Program Overview:** All relevant employees receive dedicated training on responsible gambling upon hiring, and refresher training at least annually (with more frequent updates if policies change or new risks emerge). This includes customer support agents, VIP managers, fraud/risk analysts, marketing staff, game developers/product teams, and compliance personnel. We tailor the training content to each group's job functions, but also cover core universal topics so everyone shares a baseline understanding.

9.1. Core Topics Covered:

Our responsible gambling training curriculum covers at minimum the following critical topics:

- **Identifying Signs of Problem Gambling:** Staff learn to recognize common signs of gambling-related distress or addiction in players. This includes both observable behavior or through the account (e.g., the risk indicators mentioned earlier like escalating deposits, frantic messages asking for bonuses) and direct communication cues (e.g., a player expressing anxiety about losses, or a family member contacting us with concerns). Role-play scenarios and real-world examples are used to illustrate signs such as agitation, aggressiveness towards staff, evidence of financial desperation (like trying to deposit with multiple failed cards), or emotional statements indicating loss of control. Employees are taught that these signs should be taken seriously and not ignored.
- **How to Respond and Interact with At-Risk Players:** Staff are trained in techniques for conducting sensitive and structured conversations with players who may be at risk. This includes dos and don'ts of communication: for instance, do express concern and offer help, don't be accusatory or judgmental. They learn how to suggest the use of responsible gaming tools in a helpful manner, how to handle a player who may be in denial, and how to escalate the issue to a specialist or manager if the situation is beyond a frontline agent's capacity. The concept of motivational interviewing or gentle intervention is introduced for relevant roles, so that staff can guide a player toward self-assessment or self-exclusion if needed.
- **Providing Support and Resources:** Employees are instructed on how to direct players to the appropriate help resources. This means every customer-facing employee knows where to find information about our deposit limit features, how to assist a customer in setting a limit or self-excluding, and how to connect them with professional support outside Terra Force. We ensure staff have up-to-date contact lists for gambling counseling organizations and can confidently refer a player to those services. For example, if a player says "I think I have a problem," our support agent might respond, "I'm sorry to hear that. We have tools that might help, such as self-exclusion – I can guide you through that. Also, organizations like Gamblers Anonymous or GamCare can offer free counseling and support. Would you like their contact information?" The training emphasizes empathy and practicality-empowering employees to actually assist the player in taking action, not just giving out info.

By thoroughly training Luxsoft N.V. ensures that our responsible gambling measures are not just written policies but living practices enforced by attentive, educated personnel. Our employees are the front line of our defense against problem gambling harm – with their eyes and ears on player behaviors and their interactions, they can often make the biggest difference. We are proud of our team's commitment to player welfare and we continually reinforce that commitment through training and leadership support.

10 Monitoring, Review, and Continuous Improvement

Responsible gambling is not a one-time effort but an ongoing commitment. Luxsoft N.V. has established processes to continually monitor the effectiveness of this policy and to ensure we remain in full compliance with regulatory requirements as well as responsive to new challenges. The following outlines how we govern and refine our responsible gambling program over time:

- **Compliance Monitoring:** The Responsible Gaming Officer and compliance team continuously monitor adherence to each aspect of this policy. This includes regular checks and audits of our operational logs (e.g., verifying that age verification is happening for all new accounts, confirming that self-exclusion requests are handled promptly and accurately, reviewing marketing materials for compliance, etc.). We utilize internal audit tools. Any non-compliance or gaps identified are documented and corrected immediately, with root-cause analysis to prevent recurrence.
- **Annual Policy Review:** At minimum annually, Company conducts a formal review of this Responsible Gaming Policy and all associated procedures. The Responsible Gaming Officer compiles an annual report (as mentioned earlier) summarizing the year's activities and the effectiveness of measures to the Luxsoft N.V. management team. Any material changes to the Responsible Gaming policy are reported to the CGA.
- **Regulatory Updates and Best Practices:** The gambling industry and its regulation are constantly evolving. Luxsoft N.V. commits to staying current with all mandatory requirements issued by the CGA and any other relevant authority. For instance, if the CGA updates its Responsible Gaming Policy for operators to include new measures or higher standards, we will promptly integrate those into our operations. We also proactively look at best practices from other leading jurisdictions (such as the UK, Malta, etc.) to ensure our measures are world-class. In particular, as Curaçao implements the LOK and continues to strengthen oversight, Company is fully aligned with the direction of these reforms, which focus on enhanced player protection.
- **Incident Response and Improvement:** If a responsible gambling-related incident occurs (for example, a case where a player suffered harm that might have been preventable, or we failed to catch an underage gambler immediately), Company conducts a post-incident analysis. We review what went wrong, whether procedures were followed, and what can be improved. Outcomes of such analyses can include retraining staff, tightening certain controls, or investing in better technology (for instance, more sophisticated behavior analytics). We treat any incident as an opportunity to strengthen our system and prevent similar occurrences in the future.
- **Documentation:** All elements of our responsible gambling program are documented. This includes this policy (which is a public-facing document for players and

Responsible Gaming Policy**Luxsoft N.V.**

regulators), and internal procedure manuals for staff on how to execute the policy. We ensure that these documents are kept up-to-date.

Luxsoft N.V. remains steadfast in its commitment to responsible gambling. By implementing all mandatory measures – such as age verification, information accessibility, self-assessment, behavior tracking, limits, cooling-off, self-exclusion, advertising standards, and staff training – and by embracing recommended practices like reality checks and additional limits, we aim not only to comply with regulatory requirements but to truly foster a safer gambling environment. This Responsible Gaming Policy is a living document that will continue to evolve as we learn from experience and as standards rise. We believe that player trust and wellbeing are integral to our success, and we will consistently work to uphold these values. Luxsoft N.V. encourages any player with questions or in need of assistance regarding this policy to contact us at any time – we are here to help you gamble responsibly.

By: UBO of **Luxsoft N.V.**

Name: Anatolii Snehrov

Date: 12.11.2025

Signature _____

