

Responsible Gaming Policy
MCG Technologies N.V.

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Version Control

Version	Date	Description of Changes	Author
1.0	15.06.2026	First Version	Compliance Officer

1. Introduction

MCG Technologies N.V. (referred to as "the Operator", "the Company", "us", "we") provides entertainment services, considering the specifics of gambling and associated risks. One of the main objectives of the company is to follow the principles of responsible gambling. The safety and reliability of the game guide the development of high-quality services and products. Special conditions created by MCG Technologies N.V. are designed to promote responsible gambling and mitigate potential negative consequences in case of gambling addiction.

2. Purpose

The purpose of this document is to establish comprehensive rules and guidelines for the adoption of responsible gambling principles and practices. It serves as a framework to ensure the safety and well-being of our users by maintaining a responsible gaming environment.

3. Definition of Responsible Gaming

Responsible gaming is a fundamental principle that guides our commitment to providing a secure online gaming experience for all players. It entails our dedication to preventing underage individuals from participating in gambling activities and identifying those who may be struggling to control their gambling habits.

4. Measures to Promote Responsible Gambling

To uphold our commitment to responsible gambling, we have implemented various measures aimed at ensuring the well-being of our users. These measures include:

- Publishing a clear and accessible Responsible Gaming policy for players.
- Providing Responsible Gaming tools and informational resources.
- Implementing monitoring systems to detect and manage problematic gambling behaviour.
- Complying with regulatory reporting and auditing obligations.
- Prohibition on offering credit to players.

5. Mandatory Responsible Gaming Features

5.1 Age verification

5.1.1 Participation in any games of chance offered by MCG Technologies N.V. is strictly prohibited for individuals under the age of 18 years (or higher, subject to minimum gambling age in each jurisdiction where we operate).

5.1.2 Age Verification Procedures:

- Initial Registration – self-attestation. During account creation, all players are required to:

- Enter their full date of birth.
- Confirm they are over 18 years of age by checking a mandatory age declaration checkbox.
- System-Driven Risk Flags
 - Use of obviously invalid or suspicious dates of birth.
 - Email addresses or payment details associated with previous underage attempts.

5.1.3 Mandatory Document Verification

No player shall be permitted to make a first withdrawal or exceed the risk-based verification threshold without submitting a valid proof of age. The following are mandatory:

- Government-issued photo ID (passport, national ID card, or driver's license).
- Screenshots or cropped documents are not accepted.
- The document must be clear and valid (not expired).
- Documents are cross verified against registration data.

5.1.4 Additional Verification Measures

- The following may be used to support the age verification process, but do not replace the government ID requirement:
 - Electronic age verification software
 - Payment method validation
 - Third-party or government database checks
 - Biometric or selfie checks

5.1.5 Detection of a Minor After Account Creation

- If the operator becomes aware that a minor has gained access, the following actions will be taken immediately:
 - The account will be closed without delay.
 - The operator will refund all deposits made by the player.
 - All winnings will be forfeited in accordance with legal requirements.

Where a minor is identified, the case is immediately escalated to the Responsible Gaming Officer and documented. All actions taken, including account closure and fund handling are recorded and retained for audit purposes.

5.1.6 Record Keeping and Audits

- All records relating to age verification checks (including documents submitted, verification outcomes, communications, and decisions) are securely stored for a minimum of 5 years.

- These records will be made available to the Curacao Gaming Authority (CGA) upon request.

5.2 Accessible Responsible Gaming information

5.2.1 Responsible Gaming Section

- Information on responsible gambling practices.
- Direct access to tools such as self-exclusion, cooling-off periods, and deposit limits.
- Contact details for Responsible Gaming support are available on the website as live chat and email – support@[brandname].com.
- Content in both English and the official language of the target market.

5.2.2 Homepage Visibility

- A clear and visible link to the RG Section is available on the homepage.

5.2.3 Terms & Conditions

- Reference the RG Section.
- Are accessible within one click from the homepage.
- Inform players of available Responsible Gaming tools and their use.

5.2.4 Footer Requirements

The website footer displays:

- A warning that underage gambling is prohibited.
- The name, address, and CGA license number of the operator.
- A statement confirming CGA regulatory oversight.
- The CGA digital seal.
- Links to GambleAware.

5.3 Player self-assessment tools

5.3.1 Access to Account History

- Longer transaction histories can be requested and will be provided within 10 working days.
- If delays occur due to exceptional circumstances, explanation will be provided to the player, together with an ETA.

5.3.2 Self-Assessment Tools

- We offer access to Gamblers Anonymous 20-Question Quiz [here](#).
- Interpreting the results of:

- 0 “Yes” answers: Low risk for gambling problems.
- 1 “Yes” answer: Moderate risk; further assessment may be needed.
- 2+ “Yes” answers: High risk; further evaluation and intervention are strongly recommended.

5.3.3 Follow-Up Recommendations

- Players who identify risky behaviours are advised to:
 - Set deposit limits
 - Utilise cooling-off periods
 - Consider self-exclusion options

5.4 Gambling behaviour tracking

5.4.1 Monitoring Indicators

- Our system and staff monitor the following behaviours that may indicate problematic gambling:
 - Sudden increases in deposit or wagering activity
 - Repeated failed transactions due to insufficient funds
 - Frequent reversal of withdrawal requests
 - Extended, unexplained gaming sessions
 - Excessive or agitated contact with customer support
 - Repeated changes to Responsible Gaming tools
 - Signs of financial stress, such as declines due to insufficient funds
 - Attempts to circumvent our controls by creating multiple accounts

5.4.2 Identification & Intervention Procedures

- A risk-based profiling system is used to assess player behaviour.
- All concerns and interactions are logged in the Player Management system.
- Interventions include:
 - Promoting use of RG tools (e.g., limits, cooling-off, self-exclusion)
 - Imposing temporary limits or suspending the account
 - Permanent exclusion in severe or repeated cases

The Company applies a structured intervention approach based on identified risk indicators. Where multiple or severe indicators are identified, the player shall be escalated for enhanced review and appropriate intervention.

All interventions are documented, including trigger, action taken and outcome.

Furthermore, all Responsible Gaming interactions, restrictions and decisions are recorded in the Player Management System and retained for a minimum of five (5) years. Records are available for inspection by the CGA upon request.

5.4.3 Compliance Assurance

- Responsible Gaming measures will never be misused to delay withdrawals.

5.5 Cooling-Off and Self-Exclusion

5.5.1 Players are clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable. The information is available at all times via the RG Section of the website and app.

	Cooling Off	Self-Exclusion
Wagering Prohibited	Player selection – all or by vertical.	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or All operator brands – as selected	All brands/domains under the operator's license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None
Ante post bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing message	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. Operator should have a plan to fully automate this process in short term.
Reactivation	Automatic	Player initiated

All self-exclusion and cooling-off requests are implemented immediately upon confirmation by the player. Where requests are submitted via customer support, the selected restriction gets activated within 24 hours. The Company ensures that excluded players cannot access services or create new accounts.

5.5.2 Cooling-Off

- Available durations: 24 hours, 7 days, 1 month, or 3 months
- Scope options:
 - Players may select preferences for duration
 - Marketing opt-out is mandatory for all options
- Implementation:
 - Takes immediate effect—no bonuses or promotional offers will be presented
 - Accounts remain active for withdrawals
 - All gambling features are disabled
 - Cooling-off ends automatically; no action required by the player

5.5.3 Self-Exclusion

- Available durations: 1 year, 3 years, 5 years, 10 years, or lifetime
- Scope options:
 - Players may select preferences for duration
 - Applies to all brands, all products
 - Automatic marketing opt-out
 - Players can initiate and complete the self-exclusion process directly from their personal account, without the need for support agent involvement or approval.
- Implementation:
 - Takes immediate effect once confirmed by the player
 - Account is fully closed and inaccessible
 - Operator will block known payment methods and prevent duplicate accounts
 - Progressive jackpot contributions remain in place, but the player forfeits further participation
 - No marketing is allowed during the exclusion period
- Reactivation:
 - Self-exclusion is irrevocable during the selected period
 - After expiry, the player must formally request reactivation in writing via customer support through live chat or email.

5.5.4 Operator-Initiated Exclusion

- We may enforce a mandatory exclusion if:
 - The player exhibits signs of problematic gambling
 - There is suspicion or evidence of criminal activity
- Such exclusions are never based on a player's winnings.
- All cases are documented and retained for a minimum of five years.

The Company shall apply operator-initiated restrictions where a player exhibits clear signs of problematic gambling behaviour. The decision to impose restrictions must be based on documented indicators and approved by the Responsible Gaming Officer or Compliance function.

5.6 Deposit limits

5.6.1 Players can set deposit limits for daily, weekly, or monthly periods.

- Once a deposit limit is reached, no further deposits can be made until the specified period resets.
- If a player requests to increase the restrictiveness of their deposit limit, the change must take effect immediately.
- If a player requests to decrease the restrictiveness (i.e., raise the limit), the change must be subject to a minimum 24-hour cooling-off period before implementation.
- Any wagers (settled or unsettled) made prior to a deposit limit being set are not affected by the new limit.

5.6.2 Exceptions to Limits and Exclusions

- A limit or exclusion set when a player has an unresolved ante-post bet on a future event.
- In such cases:
 - The restriction must still be honoured immediately, with exceptions only for the ongoing gameplay or wager.
 - Once the game, or wager concludes, the restriction must fully apply.
 - No additional gameplay or wagering is permitted until the restriction is lifted — e.g., players cannot place new bets while a current one is unresolved.

5.7 Responsible advertising/marketing

5.7.1 Prohibited Marketing Practices

- No targeting of vulnerable groups: visuals or messaging must not appeal directly to vulnerable individuals.
- No portrayal of gambling as an investment: advertising must not suggest gambling can generate income or solve financial issues.
- No misrepresentation of chance vs. skill: marketing must not imply that chance-based games can be influenced by skill.
- No emotional manipulation: gambling must not be presented as a solution to emotional or mental problems.
- No use of minors: minors must not appear in, or be depicted as engaging with, gambling-related content.
- No explicit content: sexual or pornographic imagery or innuendo is strictly prohibited.
- No promotion of harmful behaviours: there must be no link between gambling and alcohol, drugs, smoking, seduction, or attractiveness.

5.7.2 Bonuses and Promotions

- All bonuses must be clearly communicated with transparent terms and conditions.
- Bonuses must not encourage excessive or irresponsible gambling.

5.7.3 Third-Party Involvement

- Operators are responsible for ensuring that all affiliates, ambassadors, and influencers comply with Responsible Gaming guidelines.
- Any third-party promoting the operator's brand must be made aware of the Responsible Gaming policy and required to follow it.

The Company shall actively monitor affiliates and third-party partners to ensure compliance with Responsible Gaming requirements. Any non-compliance must result in appropriate action, including suspension or termination of the relationship.

5.7.4 Responsible Gaming Messaging

- All advertisements must prominently display a Responsible Gaming message or slogan.

5.8 Staff training in Responsible Gaming

5.8.1 Initial Training

- All customer-facing and RG staff complete RG training. New hires are trained as part of their onboarding.

5.8.2 Update Training

- Required when new RG tools, policies, or regulatory changes are introduced.
- Refreshers are provided to all staff on at least an annual basis.

5.8.3 Training covers the following matters:

- Identifying gambling-related distress.
- Handling sensitive player interactions.
- Escalation procedures.
- Use of RG tools and support services.

All Responsible Gaming training must be documented, including attendance, content and completion status. Training records shall be retained for a minimum of five (5) years and be available for inspection.

6. Responsible Gaming Officer / Role

The Responsible Gaming Officer: Nicholas Gatt

Contact email at compliance@enxservices.io

The Responsible Gaming Officer must:

- Submit a Responsible Gaming report at least once every 12 months to management.
- Include policy effectiveness evaluation and recommendations for improvement.
- Report any material policy changes to the CGA.

The Responsible Gaming Officer has oversight over all responsible gaming cases and has the authority to escalate high-risk players to senior management. All Responsible Gaming-related actions and decisions are documented and available for audit purposes.

7. Regulatory References

- **National Ordinance on Games of Chance** (LOK / Landsverordening op de kansspelen) — PB 2024, no. 157: <https://gamingcontrol.spin->

cdn.com/media/online_gaming/20241230_landsverordening_op_de_kansspelen.pdf

- **Responsible Gaming Policy for Licensed Operators** (Version 1.0, dated 17 April 2025; final post-consultation version mandating the nine core elements):
https://gamingcontrol.spin-cdn.com/media/online_gaming/20250428_cga_responsible_gaming_policy_17_april_2025_final.pdf