

Responsible Gaming Policy

GALAKTIKA N.V.

Scharlooweg 39 Willemstad, Curaçao

April 2025

Document Information

Subject	Responsible Gaming Policy
Involvements	All departments
Responsibility	Responsible Gaming Officer
Approval	Director
Review	Annually or earlier as needed
Classification	Company confidential
Version	1.0
Updated By	N/A
Authorised By	Director
Distribution Date	10/04/2025

1. Introduction

“Responsible Gaming” refers to a set of policies and practices aimed at ensuring that gambling is conducted in a manner that protects players from gambling-related harm and promotes fair, transparent, and socially responsible operations.

GALAKTIKA N.V. (the “Company”) recognizes that while gambling is a form of entertainment for most players, a small percentage may experience difficulties in controlling their gambling behavior. The Company acknowledges its obligation to implement systems and safeguards to mitigate the risks of problem gambling, to protect vulnerable individuals, and to comply with all applicable Responsible Gaming (RG) regulatory requirements.

This Responsible Gaming Policy (the “Policy”) is intended to guide the Company and its personnel in identifying, managing, and mitigating gambling-related harm while complying with the laws and requirements of the Curaçao Gaming Authority.

2. Scope of this Policy

This Policy outlines the Company's commitment to responsible gambling and defines the framework for internal controls, procedures, and operational standards related to Responsible Gaming.

The Policy applies to all departments, personnel, and third-party partners of the Company who engage in gambling-related operations, customer support, marketing, risk management, or player interaction.

The Policy forms the basis for the implementation of detailed procedures concerning:

- player protection and intervention;
- player tools and safeguards (e.g. self-exclusion, deposit limits);
- detection of problematic gambling behavior;
- staff training and internal escalation; and
- responsible marketing and communication.

This Policy is to be interpreted in accordance with the applicable legislation and the requirements of the Curaçao Gaming Authority, as well as any guidance or circulars issued by the regulator. The Company shall ensure that all policies and processes relating to Responsible Gaming are reviewed regularly and kept in line with the most current legal and regulatory standards.

3. Responsible Gaming Officer (RGO)

A Responsible Gaming Officer (RGO) is appointed by the Company to oversee the implementation and effectiveness of the Responsible Gaming Policy, including the monitoring of controls, risk indicators, and compliance procedures.

Where a dedicated RGO is not yet formally appointed, the responsibilities shall be fulfilled by the Compliance Officer.

The RGO responsibilities include, but are not limited to:

- oversight of player risk profiling and behavioral monitoring systems;
- review and management of escalated player cases and interventions;
- implementation and review of player protection tools such as self-exclusion and deposit limits;
- ensuring appropriate staff training on responsible gambling protocols;
- regular internal assessments of Responsible Gaming measures and effectiveness;
- recordkeeping and documentation of Responsible Gaming actions;
- ensuring compliance with advertising, marketing, and affiliate conduct standards;

- liaison with the Curaçao Gaming Authority where required; and
- maintaining awareness of regulatory developments and updates related to responsible gambling.

The RGO shall have access to sufficient resources and support to carry out these responsibilities effectively and shall act independently in decisions concerning player protection.

4. Age Verification

The Company enforces strict age verification procedures to prevent underage gambling, in full compliance with regulatory obligations.

- **Minimum Age Requirement:** Players must confirm they are at least 18 years old (or older if required by the jurisdiction of residence) before being allowed to deposit or place wagers.
- **Verification During Registration:** During account registration, the Company verifies that the player is not a minor by requiring confirmation of date of birth. Where feasible, this is supplemented by additional measures such as a checkbox confirming the player is over 18 and validation of a payment method (e.g., credit card).
- **Mandatory Identity Verification:** Age verification includes at minimum the collection and validation of a government-issued identification document (such as a passport, national ID card, or driver's license). This verification is conducted either:
 - At the time of registration,
 - Upon reaching applicable AML or KYC thresholds (e.g. cumulative transactions of XCG. 4,000 (€2000) (all amounts are indicated in XCG., approximate EUR equivalents are provided for simplification and rounding purposes only, based on publicly available exchange rate information, in the event of any currency fluctuations, XCG. shall prevail for calculation purposes)),
 - Or earlier if the Company has any reason to doubt the player's declared age.
- **Secondary Verification Methods:** Where necessary, the Company may employ additional verification measures such as proof of address, selfie verification, or checks against third-party databases.
- **Enforcement Actions:** If a player is determined to be underage or there is reasonable suspicion to believe so, access to the account is denied or suspended. Deposited funds (excluding any winnings) are returned to the minor, in accordance with AML policies. Any winnings are forfeited. The Company communicates the account closure and reasons clearly to the affected individual.
- **Record-Keeping:** The Company maintains secure and auditable records of all age verification attempts and their results. These records are made available for regulatory review upon request.

The Company is committed to ensuring that no underage individual can participate in any gambling activities on its platform.

5. Information accessibility

The Company ensures that all players have continuous access to clear, accurate, and relevant information that supports informed decision-making and responsible gambling behavior.

Homepage Accessibility

- A clear and visible link to the Company's Responsible Gaming Policy is present on the homepage and is accessible from all relevant areas of the website and application interface.
- The Responsible Gaming Policy is available in English and in any additional languages relevant to the Company's target markets.
- Players are provided with direct access to Responsible Gaming tools, including but not limited to:
 - Self-exclusion
 - Cooling-off periods
 - Limit-setting functionalities
 - Other responsible gaming measures described in this Policy
- The homepage clearly displays contact information (such as a dedicated email address) for players to reach out to the Company regarding any responsible gambling concerns.

Terms & Conditions Inclusion

- The Responsible Gaming Policy is explicitly referenced within the Terms and Conditions of the website.
- The Terms and Conditions are accessible within one click from the homepage.
- Within the Terms and Conditions, players are informed about the available responsible gaming tools, their purpose, and instructions for use.

Footer Information Requirements

The footer of the Company's gaming website includes the following mandatory elements:

- A clear visual indication that underage gambling is prohibited.
- The name and registered address of the licensed operator.
- The official license number issued by the Curaçao Gaming Authority.
- A statement confirming that the Company operates under the regulatory oversight of the Curaçao Gaming Authority.
- A link to the Responsible Gaming Policy Statement.
- The digital CGA seal issued by the regulator.
- A link to gambling addiction support resources, both international and local (where available), including organizations such as:
 - GamCare

- Gamblers Anonymous
- GambleAware
- Local support resources relevant to the Company's active markets

By meeting these requirements, the Company ensures that all responsible gaming resources, disclosures, and contact points are presented in a visible, accessible, and transparent manner across the platform.

6. Player self-assessments

The Company provides players with access to tools that help them evaluate their gambling behavior and make informed decisions about their activity.

- **Betting and Wagering History:** Players have continuous access to a detailed record of their betting and wagering activity from the date the account was opened. This includes transaction timestamps and relevant data, allowing players to monitor their behavior over time.
- **Self-Assessment Tools:** Players are encouraged to regularly assess whether their gambling remains within healthy boundaries by using available self-assessment tools. These tools consist of structured questions designed to help identify signs of potential gambling problems.
- **Screening Instruments:** The Company provides access to commonly used and recognized self-assessment tests, such as:
 - The 20-Question Quiz from Gamblers Anonymous.
 - The CAGE Questionnaire (adapted for gambling)

The Company encourages any player who recognizes potential problem gambling behavior through self-assessment to consider using the responsible gaming tools provided, such as self-exclusion, deposit limits, and time-out features.

7. Behavioral Tracking

The Company actively monitors player behavior to identify signs of problematic gambling, in accordance with regulatory requirements and Article 1.4(e) of the LOK, which prohibits operators from allowing participation in gambling by individuals who may reasonably be considered vulnerable.

Monitoring and Detection

The Company tracks behavioral risk indicators using a combination of trained staff and technological tools. Monitoring includes:

- Deposit and wagering frequency, including sudden increases or erratic changes in gaming activity.
- Use of multiple payment methods, especially if indicative of attempts to bypass existing limits.
- Withdrawal reversal behavior, such as cancelling cash-out requests repeatedly.
- Extended gaming sessions without breaks.
- Increased and agitated communication with customer support, such as repeated bonus requests or expressions of frustration.
- Frequent adjustments to responsible gaming tools, including the repeated raising of limits or use of time-outs.
- Players under the age of 25 engaging in disproportionate spending, especially on casino or virtual games.
- Maxing out credit cards and attempting to register additional cards.
- Spending patterns inconsistent with known demographic indicators.
- Attempts to open multiple accounts to circumvent imposed limits.

Both frontline staff (e.g. customer service, VIP managers) and automated systems may identify these patterns. Alerts are generated when defined risk thresholds are triggered, prompting review and potential action.

Player Identification and Risk Profiling

- The Company establishes player profiles containing relevant behavioral and transactional data to assess individual risk.
- Behavioral factors are continuously monitored, and real-time alerts are generated for review by responsible gaming personnel.

Player Interaction and Intervention

- When concerning behavior is identified, trained responsible gaming professionals initiate direct contact with the player.
- These interactions are documented in the Company's Player Account Management system, including observed indicators and all actions taken.

Intervention Measures

Depending on the severity of the risk, the Company may apply any of the following measures:

- Informing the player about available responsible gaming tools, such as deposit limits, time-outs, or self-exclusion.
- Applying deposit limits to the account.
- Temporarily suspending account access pending further review.
- Excluding the player from gambling activities if there is evidence of extreme risk.

The Company maintains a structured process for detection, documentation, and intervention, with the objective of preventing gambling-related harm and upholding regulatory obligations toward player protection.

8. Player facilitated cooling-off periods and self-exclusion

The Company provides players with accessible and effective tools to limit or suspend their participation in gambling activities, in line with regulatory obligations.

Cooling-Off Period – a short term, temporary restriction from gambling activities, which the player can customize

- Players are offered the option to activate a cooling-off period of:
 - 24 hours
 - 7 days
 - 1 month
 - 3 months
- The cooling-off function is clearly displayed on the website and can be activated by the player without contacting support, without requiring approval, and without delay. It is available as a single-click function and applies to one, several, or all product verticals (e.g. Slots, Table Games, Fixed Odds Betting).
- Upon activation:
 - The cooling-off period takes effect immediately.
 - The player's account is fully restricted from gambling for the selected duration.
 - The player is presented with an explanation of the difference between cooling-off and self-exclusion, and is given the option to proceed directly to self-exclusion if preferred.
 - The player is given the option to opt out of marketing communications during the cooling-off period.
- After expiration of the cooling-off period, the account is automatically reactivated, and gameplay can resume without any further action by the player.
- The Company is prohibited from discouraging players from activating a cooling-off period. This includes:
 - Questioning or delaying the player's decision,
 - Offering bonuses or incentives to continue gambling,
 - Providing reassurances or attempting to retain the player.

Self-Exclusion – a long-term, irrevocable exclusion from all gambling activities under the operator's licence

- The Company maintains a clearly defined, documented, and immediately actionable self-exclusion program.
- The self-exclusion option is prominently displayed and accessible on the website. It can be initiated and completed entirely online, without operator assistance, in 15 minutes or less.
- The player must be informed of:
 - The steps involved in initiating self-exclusion.
 - The available exclusion periods, which include:
 - 1 year (mandatory)

- 3 years
 - 5 years
 - 10 years
 - Lifetime exclusion
- The purpose and benefits of self-exclusion.
- Once initiated:
 - The exclusion takes immediate effect.
 - The player's account is deactivated, blocking all gambling activity.
 - Self-exclusion cannot be revoked before the end of the selected period.
 - The Company ensures the player is excluded from all of its domains and takes steps to prevent the creation of duplicate accounts.
- In cases of total self-exclusion (all verticals):
 - All gambling-related activity is blocked.
 - Excepting any funds frozen in accordance with AML obligations, any remaining player funds are refunded within two business days.
 - The player is removed from all marketing and promotional lists.
- In cases of partial self-exclusion (selected verticals):
 - Gambling access is restricted only within the selected product categories.
- Upon expiration of the exclusion period:
 - The account is not reactivated automatically.
 - The player must submit a written confirmation requesting reactivation.
 - The Company must:
 - Provide a responsible gaming message.
 - Remind the player of available protection tools.
 - Encourage the player to complete a problem gambling questionnaire.
 - Ensure the account is only restored under original credentials and with preserved account history.
- During and after the exclusion period:
 - The Company must not contact the player for marketing purposes.
 - The player must not receive bonuses or promotional offers.
 - Communication is limited to non-marketing matters required by law or policy.

Record-Keeping and Compliance

- The Company maintains a Self-Exclusion Register for each self-excluded player, with records retained for at least seven years from the end of the exclusion period.
- Known payment methods of self-excluded individuals are blocked from use during the exclusion period.
- If a self-excluded individual or a minor is found to have accessed gambling services:
 - All deposited funds (except those restricted under AML rules) are refunded within two business days.
 - The account is immediately blocked.
 - A detailed report is submitted to the Curaçao Gaming Authority within five working days.

Operator-Initiated Exclusion

- The Company may exclude a player at its own discretion if:
 - The player exhibits problematic gambling behavior,
 - The player engages in or attempts to engage in criminal activity via the platform.
- All such exclusions are formally documented, and records are retained for a minimum of five years.

9. Deposit limits

The Company provides players with the ability to control their gambling activity through the implementation of deposit limits, in full compliance with regulatory requirements.

- Limit Options: Players can set personal deposit limits based on a daily, weekly, or monthly period, according to their own preferences and gaming habits.
- Enforcement: Once a deposit limit is reached, the player cannot deposit additional funds until the relevant time period has expired and the limit resets.
- Adjustment of Limits:
 - Requests to decrease an existing limit (i.e., make it more strict) are implemented immediately.
 - Requests to increase or remove an existing deposit limit are subject to a mandatory seven-day waiting period before taking effect. This delay is intended to ensure that the decision to ease limits is made with proper reflection and not under impulsive circumstances.
- Optional Limits: Based on the Company's target markets and player profile, additional limits may be offered, such as:
 - Loss limits
 - Time limits
 - Wagering limits

These tools, while not mandatory, may be implemented to enhance player protection.

- Active Wagers and Exemptions: In the case where a player has active wagers or ongoing gameplay (such as participation in a tournament or an unresolved ante-post bet), deposit limits and exclusions apply immediately upon completion of the specific tournament or event. Active sessions are not forcibly interrupted, but restrictions are enforced thereafter without exception.

The Company ensures that all deposit limit functionalities are clearly available to players and applied consistently across the platform in accordance with responsible gaming standards.

10. Reality Check

The Company applies mandatory reality check measures to help players remain aware of their gambling behavior.

The following features are implemented:

- A real-time session timer that remains visible at all times while the player is logged in.
- Player-activated reality check alerts that can be configured by the player at selected time intervals. When triggered, the reality check temporarily suspends gameplay and requires the player to confirm that they have read the message before resuming.

Each reality check message may include the following:

- Clear indication of how long the player has been playing
- A display of the player's winnings and losses during that period

These reality checks are designed to briefly interrupt play and prompt conscious reflection, helping players maintain control over their gaming activity.

11. Training of employees

The Company ensures that customer service staff and responsible gaming personnel are trained to interact with players in a professional and effective manner.

Training must include the following:

- Recognizing signs of gambling-related distress, including agitation, aggression, or financial desperation.
- Conducting sensitive and structured conversations with at-risk players.
- Directing players to appropriate responsible gaming tools and external support resources.
- Ensuring that all player interactions relating to responsible gaming are documented for compliance and follow-up purposes.

Escalation procedures are in place. Any case of problematic player behavior must be escalated to the Compliance Officer or Responsible Gaming Officer, who is responsible for assessing the situation and determining if additional restrictions, exclusions, or interventions are required.

12. General responsible gaming principles regarding marketing and advertising

The Company is responsible for ensuring that all marketing, promotional, and advertising activities comply with responsible gaming principles.

Marketing restrictions include the following:

- No direct marketing (e.g. emails, messaging, bonuses, or incentives) may be sent to players during an active self-exclusion or cooling-off period.
- All advertising must avoid misleading, excessive, aggressive, or irresponsible content.
- Marketing must not target vulnerable individuals, including:
 - Minors
 - Self-excluded players
 - Individuals with known gambling problems
 - Financially vulnerable individuals

Content restrictions apply to all advertising and marketing materials:

- Advertising must not:
 - Suggest gambling as a way to achieve financial success or solve financial problems
 - Misrepresent the role of chance versus skill in games of chance
 - Use emotional manipulation (e.g. portray gambling as an escape from stress or loneliness)
 - Appeal to minors (e.g. through use of cartoons, animations, or characters)
 - Include sexually explicit imagery or suggestions
 - Associate gambling with smoking, drug use, alcohol, seduction, or enhanced attractiveness

Marketing through affiliates, influencers, or partners:

- The Company is responsible for ensuring that all business partners, including:
 - Affiliates
 - Social media influencers
 - VIP agents
 - Marketers
 comply with responsible gaming standards and applicable advertising regulations.
- Influencers must:
 - Be of legal gambling age
 - Not appeal to minors or vulnerable audiences
 - Not engage in sexually provocative content when promoting gambling

Additional advertising requirements:

- All direct marketing must exclude self-excluded players and players who have set gaming limits.
- Bonus offers and promotions must be communicated transparently, with clear and accessible terms and conditions.
- All sponsorships must avoid targeting minors and must include responsible gaming messages.
- Branding and promotional materials must not appear on youth sports equipment or at events aimed at minors.
- Social media gambling content must be age-gated and clearly identified as promotional content from a gambling operator.

The Company enforces these standards through binding agreements with all external parties, supported by compliance checks and disciplinary measures in case of violations.

Appendix 1. Definitions

Games of Chance – means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker.

LOK – National Ordinance on Games of Chance of Curaçao.

Marketing, Promotion and Advertising – refer to all resources, messages and media that promote the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns.

Mandatory Requirements – are the basic elements of a Responsible Gaming policy that must be implemented by all operators. These elements must reflect the target markets and players of the operator.

Operator – is a holder of a B2C license from the Curacao Gaming Authority (or holder of an Orange Digital Seal "Certificate of Operations").

Responsible Gaming (RG) – A framework of policies, procedures, and safeguards implemented by the operator to ensure that gambling is conducted in a safe, transparent, and socially responsible manner.

Responsible Gaming Officer (RGO) – The individual appointed by the operator to oversee the implementation, monitoring, and compliance of Responsible Gaming measures.

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.

Vulnerable Person – is defined in Clause 1.1(h) of the LOK:

1. Under eighteen years of age.
2. 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.
3. Has been banned from playing any Game of Chance either by force or at his or her own request.
4. Has been declared bankrupt.

Responsible Gaming Policy Statement

Responsible Gaming Policy Statement

GALAKTIKA N.V. is committed to promoting responsible gambling and providing a safe, fair, and enjoyable gaming environment for all players. We recognize that gambling should remain an entertainment activity, and for a small minority, it may pose a risk of harm.

We actively protect players by:

- Implementing strict age verification to prevent underage gambling.
- Providing players with self-control tools such as self-exclusion, cooling-off periods, deposit limits, and reality checks.
- Offering self-assessment tools to help players evaluate their gambling habits.
- Monitoring player behavior to proactively identify and mitigate problem gambling.
- Ensuring our marketing practices are responsible and do not target minors or vulnerable individuals.

If you or someone you know experiences problems with gambling, please contact our support or utilize our responsible gaming tools.

For further information or assistance, please visit our full Responsible Gaming Policy or contact our Responsible Gaming Officer at [ResponsibleGaming@companydomain].