

RESPONSIBLE GAMING POLICY
ISLAND LUKKLY B.V.
Effective Date: 30.09.2025
Approved by: Executive Management

1. INTRODUCTION

1.1 Island Lukkly B.V. is committed to fostering a safe, transparent, and fair gaming environment in line with the National Ordinance on Games of Chance (LOK) and the Curacao Gaming Authority (CGA) Responsible Gaming Policy for Licensed Operators (17 April 2025).

1.2 This policy sets forth the principles, governance framework, and operational procedures to ensure gambling remains an entertainment activity and to mitigate risks associated with problem gambling.

1.3. The objective of this policy is to ensure that gambling within Island Lukkly's platforms remains a form of entertainment and does not lead to harm. This will be achieved by:

- 1.3.1. Preventing underage and vulnerable persons from accessing gambling services
- 1.3.2. Provide effective Responsible Gaming (RG) tools and player support
- 1.3.3. Implement monitoring and interventions for at-risk behaviour
- 1.3.4. Training staff to detect and address signs of problem gambling
- 1.3.5. Ensuring governance, accountability, and transparent reporting

This policy applies to all Island Lukkly brands, platforms, employees, contractors, and third parties involved in the delivery of gaming services.

2. DEFINITIONS

- (a) Responsible Gaming Officer (RGO) means the designated officer appointed by Island Lukkly B.V. to oversee the implementation of this policy and to act as the point of contact for the CGA.
- (b) Vulnerable Person defined by Clause 1.1(h) of the LOK, including persons under 18, persons without control over gambling behaviour, bankrupt persons, and those already excluded.
- (c) Cooling-Off means a temporary period (24 hours to 3 months) during which a player voluntarily suspends gambling activity.
- (d) Self-Exclusion means a long-term, irrevocable period (1 year to lifetime) during which a player bars themselves from gambling across all Island Lukkly-operated brands.
- (e) Player Account Management (PAM) means system used to record player interactions, responsible gaming measures, exclusions, and operator interventions.

3. MANDATORY REQUIREMENTS

3.1. Island Lukkly complies with the nine mandatory Responsible Gaming requirements established by the CGA:

- A. Age Verification - rigorous KYC before permitting play.
- B. Information Accessibility - responsible gaming section, footer, and T&Cs.
- C. Player Self-Assessment - online tools and questionnaires.
- D. Behaviour Tracking - automated and manual monitoring for risk.
- E. Cooling-Off and Self-Exclusion - available to all players.
- F. Self-Exclusion - effective and multi-brand.
- G. Deposit Limits - configurable by players.
- H. Employee Training - regular RG training for relevant staff.
- I. Marketing & Advertising Restrictions - no targeting of minors/vulnerable groups.

3.2. The RGO is responsible for verifying compliance with all mandatory requirements and providing an annual report to management.

4. PREVENTION OF UNDERAGE GAMBLING

4.1 Strict age verification is conducted during the registration process, where each player is required to provide their date of birth and confirm, via a checkbox, that they are over 18 years old. In addition, full KYC procedures are mandatory, and players must submit a valid government-issued identification document (such as a passport, national ID card, or driver's licence) before their first withdrawal is processed. All verification records are securely stored and maintained for regulatory audit purposes. If at any stage a player is found to be a minor, their account will be immediately closed, deposits will be refunded, and any winnings will be forfeited in line with the requirements of the Curacao Gaming Authority.

4.2.

Procedures:

(a) During registration, players must enter their date of birth and confirm via checkbox that they are over 18.

(b) Prior to first withdrawal, the player must submit valid government-issued identification (passport, ID card, driver's licence). The document is verified manually or/and via automated KYC software.

(c) If a player is found to be underage at any point:

- The account is immediately closed.
- All deposits are refunded.
- Winnings are forfeited.
- The incident is logged in PAM.

(d) Additional verification tools (payment validation, selfie verification, database checks) may be used to strengthen age controls.

(e) Parents/guardians are advised to use filtering tools (BetBlocker, GamBan, NetNanny) to prevent minors from accessing gambling sites.

4.3. Records of all age verification checks are maintained and made available to the CGA upon request.

5. PLAYER INFORMATION AND ACCESSIBILITY

5.1. Island Lukkly provides players with clear, accessible Responsible Gaming information:

(a) Responsible Gaming Section is prominently displayed on the website and apps.

Content includes: available player tools, contact methods, external support organizations. The section is available in English and the primary language of the target market.

(b) Homepage Link is a direct link to the RG Section is displayed on all homepages.

(c) Terms & Conditions is the RG policy and player tools are included in T&Cs, which are accessible within one click.

(d) Footer is all websites include, namely prohibition of underage gambling, registered company details and address, license number and CGA seal and direct links to the RG Section and support services.

6. SELF-ASSESSMENT TOOLS

6.1 Players are encouraged to assess their gambling habits using built-in self-assessment questionnaires:

(a) 20 Questions (Gamblers Anonymous) - a widely recognized problem gambling test (**Annex 1**)

(b) CAGE Questionnaire - four diagnostic questions (Cut Down, Annoyed, Guilty, Eye-Opener) (**Annex 2**)

6.2 If results indicate risk, the system provides direct recommendations to:

- (a) Apply limits, cooling-off, or self-exclusion.
- (b) Contact external counselling services.

6.3 All self-assessments are voluntary and confidential.

7. BEHAVIOUR TRACKING & INTERVENTIONS

7.1 Island Lukkly applies both automated tools and manual oversight to identify risky behaviour.

(a) Monitored Indicators:

Sudden or repeated increases in deposits.

Reversal of withdrawals.

Extended or erratic gaming sessions.

Repeated failed deposits due to insufficient funds.

Frequent requests for bonuses or agitation with support staff.

Multiple accounts detected.

Excessive changes to responsible gaming settings.

(b) Intervention Procedures:

1. Identification is player behaviour flagged by system or staff.

2. Profiling is a risk level (low, medium, high) assigned.

3. First Response is information on RG tools sent to player.

4. Escalation are:

- 4.1. a mandatory deposit limits applied.
- 4.2. a temporary suspension or cooling-off enforced.
- 4.3. an operator-initiated exclusion in severe cases.

5. Recording are all interventions documented in PAM, including actions taken and player responses.

7.2 ADR outcomes are binding for ISLAND LUKKLY B.V.

7.3 A complaint may only be referred to one ADR provider per issue.

7.4 Contact details and links to our appointed ADR will be provided in the final communication and available on our website.

8. COOLING-OFF & SELF-EXCLUSION

8.1. Cooling-Off:

- (a) Options: 24h, 7d, 1m, 3m.
- (b) Player can select restriction by brand or game type.
- (c) Gambling disabled immediately.
- (d) Withdrawals remain available.
- (e) No marketing sent during this period if opted out.
- (f) Automatic reactivation after expiry.

8.2. Self-Exclusion:

- (a) Options: 1y, 3y, 5y, 10y, Lifetime.
- (b) Applies to all Island Lukkly-operated brands and domains.

- (c) Immediate and irrevocable for selected period.
- (d) Accounts are closed, login blocked, duplicate accounts prevented.
- (e) No marketing permitted.
- (f) Reactivation only possible after expiry, upon written request by the player via email or chat.

8.3. Operator-Initiated Exclusion:

- (a) Island Lukkly may exclude a player for problem gambling or criminal activity.
- (b) Records maintained for 5 years.

9. PLAYER TOOLS & LIMITS

9.1 Players can manage their gambling using the following tools:

- (a) Deposit Limits: Daily, weekly, or monthly.

Stricter limits - immediate effect.

Relaxed limits - 24h cooling-off before applying.

- (b) Reality Checks:

Visible session timers.

Pop-up reminders every 60 minutes (configurable).

Display of current net wins/losses.

- (c) Loss & Time Limits: Optional, available upon request.

- (d) Account History: Players can view 6 months of history instantly; extended history (from 12 till 24 months) available within 10 working days.

10. GOVERNANCE & REPORTING

10.1. Island Lukkly has appointed a Responsible Gaming Officer (RGO).

10.2. Responsibilities are oversee policy implementation, train staff and ensure compliance, maintain PAM records and prepare annual RG Report for management, covering: number of self-exclusions and cooling-offs, behaviour monitoring statistics, staff training records and policy effectiveness review and recommendations.

10.3. Any material change to this policy must be reported to the CGA.

11. STAFF TRAINING

11.1 All customer support, VIP managers, and marketing staff must complete Responsible Gaming training upon onboarding.

11.2. Training covers includes recognizing signs of gambling addiction, communicating with at-risk players in a sensitive and structured manner, using PAM to record interventions and directing players to internal tools and external organizations.

11.3. Refresher training is mandatory at least once per year.

11.4. Training records are maintained and subject to audit.

12. MARKETING & ADVERTISING COMPLIANCE

12.1. All marketing materials produced or distributed by Island Lukkly must be designed responsibly and may never target minors or vulnerable persons. Marketing campaigns must not suggest that gambling is a means to earn money, misrepresent the role of skill in games of chance, contain explicit sexual or otherwise harmful content, or encourage the use of alcohol, drugs, or other dangerous behaviours.

12.2. Promotional activity is strictly prohibited for players who are under self-exclusion or a cooling-off period, and all advertising must consistently include a clear responsible gaming message.

12.3. All affiliates, partners, and influencers engaged by Island Lukkly are contractually bound to comply with this policy, and the company ensures that they adhere to these standards in every communication.

13. ENHANCED MEASURES

13.1. For high-risk business areas, such as VIP players or those using cryptocurrency, Island Lukkly may adopt enhanced responsible gaming measures to provide additional protection.

13.2. These measures can include the application of stricter loss and deposit limits, more frequent reality checks to remind players of their activity, and proactive direct interventions when patterns of risky behaviour are detected. In cases where appropriate, players may also be referred to professional counselling services for further support.

14. POLICY REVIEW

This policy is reviewed at least once per year by the Responsible Gaming Officer.

Next review date: 30.09.2026.

Updates are submitted to management and reported to CGA.

13. CONTACT

In case you still have any questions, you can write your question to our support team by email: **support@lukkly.com**.

20 Questions

1. The player should answer “Yes” or “No” to each question.

- 1) Have you ever lost time from work or school because of gambling?
- 2) Has gambling made your home life unhappy?
- 3) Has gambling affected your reputation?
- 4) Have you ever felt remorse after gambling?
- 5) Do you gamble to pay debts or solve financial difficulties?
- 6) Does gambling create in you a desire to win back “just a little more” to cover your losses?
- 7) After a win, do you have a strong urge to return and win more?
- 8) After a loss, do you feel driven to return and try to recover your losses?
- 9) Do you often gamble longer than you had planned?
- 10) Have you ever borrowed money to finance your gambling?
- 11) Have you ever sold anything to get money for gambling?
- 12) Do you feel unwilling to spend money on daily expenses because you prefer to save it for gambling?
- 13) Has gambling reduced your care or responsibility for yourself or your family?
- 14) Do you delay paying bills or meeting obligations in order to gamble?
- 15) Do you gamble to escape worry, loneliness, or depression?
- 16) Has gambling caused you to experience problems with sleep?
- 17) Do feelings of disappointment or stress create in you a desire to gamble again?
- 18) Have you ever committed an illegal act to finance your gambling?
- 19) Have you ever thought of or attempted suicide because of gambling?
- 20) Does the urge to gamble persist despite the negative consequences it causes?

2. If 7 (seven) or more “Yes” answers indicate a very high likelihood of gambling addiction.
5 (five) – 6 (six) “Yes” answers suggest a strong warning signal and potential risk.
Fewer than 5 (five) “Yes” answers indicate a low to moderate risk, but the player is still encouraged to monitor their gambling behaviour carefully.

CAGE Questionnaire
(Adapted for Gambling)

1. Please answer the following four questions honestly with Yes or No:

- 1) "Cut Down" - Have you ever felt that you should cut down on your gambling?
- 2) "Annoyed" - Have people annoyed you by criticizing your gambling habits?
- 3) "Guilty" - Have you ever felt guilty about the way you gamble or about what happens when you gamble?
- 4) "Eye-Opener" - Have you ever gambled in the morning ("eye-opener") to get yourself going or to recover from gambling losses?

2. Results:

If 0 (zero) "Yes" answers this is a Low risk.

If 1 (one) "Yes" answer this is a Moderate risk, further assessment may be needed.

If 2 (two) or more "Yes" answers this is a High risk. Strongly recommended to seek help, use Responsible Gaming tools, or contact a professional support service.



Management N.V.
Managing Director