

Nova Technology BV

Social Responsibility Policy

Incorporating

Fair & Open Policy

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1. INTRODUCTION

- 1.1 Nova Technology (the “Company”) is committed to achieving a high standard of regulatory compliance in promoting socially responsible gambling through protecting young people and those who are potentially vulnerable from being harmed or exploited by gambling. We aim to provide an enjoyable experience for players, but understand that, for a minority of players, gambling can become a problem. We also adhere to ensuring that the gambling product we offer protects the consumer , and that in this regard we are open and transparent.
- 1.2 We consider responsible and fair gambling to be an essential part of our business, our philosophy and our mission. We realise that we have a shared obligation to provide responsible and fair gambling to our players. to achieve this, to train our employees and provide support. Responsible and fair gambling is embedded within our DNA. As a business, we will always devote energy, creativity and resources to responsible gambling and minimising the harm caused by gambling. To achieve this, we will endeavour to learn from our own and others’ experiences and use a range of technology, innovations and tools available to us. We will also seek to incentivise staff and executives to think innovatively about where we can contribute more.
- 1.3 We recognise that in common with all our policies and procedures that compliance is an ongoing dynamic and this document will therefore be updated and reviewed regularly. Responsibility for this will lie with our in-house compliance officer.

2. United Kingdom Gambling Commission (“UKGC”) Guidance in connection with Social Responsibility

UKGC legislation

The Commissions LCCP legislation sets out three licensing objectives, one of which is “protecting children and other vulnerable persons from being harmed or exploited by gambling”.

We have paid credence to the UKGC’s Strengthening Social Responsibility consultation response document (July 2019) and consultation response documents, which are available on the UKGC website. We are also aware that as part of the LCCP licencing conditions, we will need to make a financial contribution to a body which is dedicated to the research into treatment and prevention of gambling related harm, as well as adhere to the Advertising Standards Guidelines (ASA) codes and industry codes, in connection with any advertising. In this regard we will ensure that all staff are aware of the latest ASA guidelines and any new codes that could be implemented in or beyond 2022.

3 OUR ROLE

What is responsible gambling?

- 3.1 Gambling is a form of entertainment and as such it involves expenditure. **Responsible Gambling** means helping a player ensure that they do not spend more money or time gambling than they can reasonably afford, while keeping in mind their other responsibilities in life. It is also important that we protect children and other vulnerable persons from being harmed or exploited by gambling.
- 3.2 We as a B2C operator, have a shared responsibility to help customers gamble responsibly. We appreciate that we need to make a positive effort to prevent problem gambling from arising, for example, by ensuring the content we offer are socially responsible.

Senior management

- 3.3 Ultimately, we appreciate that the Senior Management and their advisors will be the “spearhead” of responsible gambling and held to account for the licensing objectives. However, all our employees have an important role to play in promoting responsible gambling.

Responsible gambling approach

- 3.4 Nova has adopted a risk-based approach to responsible gambling, with the aim of managing and mitigating the risk of gambling-related harm in a proportionate way. We understand that developing our policies and procedures relating to responsible gambling, is not a one-off exercise and remain committed to keeping them under regular review. We will, therefore, continually review and update our policies and procedures as legal and/or regulatory changes occur. Also, we will conduct a critical review of our policies and procedures every six months and provide regular training whenever required.

- 3.5 The following principles set out our commitment to responsible gambling:
- Prevent underage gambling.
 - Offer responsible games.
 - Conduct further research and consider when sourcing new products or features.
 - Sharing data and information relating to the success or otherwise of piloted interventions.
 - Review data and emerging evidence about piloted interventions.
 - Collaborate with customers to establish responsible gambling best practices.
 - Collaborate with other gambling businesses to share knowledge.
 - Collaborate with regulators.
 - Support problem gambling organisations.
 - Educate employees (as appropriate to their roles).
 - To continually review the client's protection measures.

Responsible product design

- 3.6 In accordance with Remote Gambling and Software Technical Standards ("RTS" License Condition 2.3.1), we will ensure that the products offered are designed responsibly and minimise the likelihood that they exploit or encourage problem gambling. Our products will not actively encourage customers to chase their losses, increase their stake or amount they have decided to gamble, or to continue gambling after they have indicated they wish to stop.

4. TRAINING

- 4.1 Employee education and training is an important component of our responsible gambling programme.
- 4.2 Our education and training programme will educate employees about Nova's commitment to responsible gambling and player protection, including problem gambling and at-risk gambling, how to identify signs, causes of harmful gambling, how to intervene, available resources for those that need help and responsible gambling initiatives.

5 EMPLOYEE ASSISTANCE

- 5.1 It is important for us, as a responsible business, to help employees (just as much as players) understand the risk of taking part in gambling and to keep gambling a fun activity that does not impact negatively on anyone's lives. We will not permit our employees (unless as part of a mystery shopper compliance check – see below) to become a customer of any of our sites, in any event, but we will be on hand to help them if they encounter problems playing with other operators in their leisure time.
- 5.2 The following signs¹ may indicate a problem for players :
- Spending more money and time on gambling than you can afford.
 - Finding it hard to manage or stop your gambling.
 - Having arguments with family or friends about money and gambling.
 - Losing interest in usual activities or hobbies like going out with friends or spending time with family.
 - Always thinking or talking about gambling.
 - Lying about your gambling or hiding it from other people.

- Chasing losses or gambling to get out of financial trouble.
- Gambling until all of your money is gone.
- Borrowing money, selling possessions or not paying bills in order to pay for gambling.
- Needing to gamble with larger amounts of money or for a longer time to get the same feeling of excitement or buzz.
- Neglecting work, school, family, personal needs or household responsibilities because of gambling.
- Feeling: anxious, worried, guilty, depressed or irritable.

6 EMPLOYMENT OF CHILDREN

- 6.1 We will not employ children or young persons to provide facilities for gambling. Our Human Resources department will ensure that all employees are properly vetted to ensure they are not underage.

7 SUPPORT FOR RESEARCH, EDUCATION AND TRAINING

- 7.1 We will make an annual contribution to a responsible gambling trust or charity to fund research into the prevention and treatment of gambling-related harm, develop harm prevention strategies and identify and fund treatment for individuals harmed by gambling.
- 7.2 We will support the mission of these charities, through donations and our own business practices relating to social responsibility.

8 FAIR & OPEN PROVISIONS

Legislation

- 8.1 Nova is committed to being fair and open in its gambling operations, complying with the licensing objectives and operating at a high standard.
- 8.2 The LCCP Legislation sets out three licensing objectives, one of which is “ensuring that gambling is conducted in a fair and open way”.

9 FAIR AND OPEN PROVISIONS continued

Game rules

- 9.1 The Company and its 3rd party providers have developed a random number generator (an “RNG”). The RNG has been checked and certified by Gaming Laboratories International (GLI). We follow strict procedures to ensure that any RNG or any variant is certified to produce random results; that game outcomes are fair and all pay- outs are correct; that games are free from defects and function to specification; and that games are secure and do not compromise our customers (possible cross reference to supplier) or any end users.

10 THIRD PARTIES

10.1 We perform due diligence on third parties to ensure they operate legally and are reputable.

10.2 We will remind our third-party partners that they must conduct themselves as if they were bound by the same licence conditions and codes of practice as the Company. This will be done before signing with any new partner or affiliate thereafter.

10.3 Our third-party contracts will include the following terms:

- They will enable us to oblige the third party to provide us with such information that we may reasonably require to comply with our licensing and regulatory obligations to the UKGC;
- They will enable us to terminate the contract promptly if, in our reasonable opinion, the third party has acted in a manner which is inconsistent with the licensing objectives;
- They will enable us to terminate the contract promptly if, in our reasonable opinion, the third party is in breach of the codes and conditions; and
- They will require that any user game interfaces comply with the UKGC's technical standards.
- Specifically, we will be reviewing the licensees' terms and conditions , asking for/reviewing instances of material complaints, particularly where there is a regulatory review, including our own supervision on social media , and assessing the player experience by way of mystery shopping and by way of a co-ordinated compliance programme.