

Responsible Gaming Policies

1. Introduction

The exponential growth of the Sports Betting and/or Online Gaming Platforms and Operators sector has brought to light the challenges and responsibilities of companies operating in this sector, especially those committed to the regulations in force and compliance with international standards.

Safety, innovation, responsibility and culture are the fundamental pillars of **WDC International B. V. ("WDC")**, whose principles are reliability, integrity and compliance. In this way, aware of its Corporate Social Responsibility, the company has aimed and prioritized guaranteeing a safe and sound platform for its users, always in line with the regulations recently issued by the Curaçao Regulators.

The aim of this **Responsible Gaming Policy** is to adopt the Principles of Responsible Gaming, as well as their application in actions aimed at raising awareness among the company, its employees and users, in order to materialize the theoretical regulations laid down by the Federal Government, and also to innovate in terms of social responsibility with regard to mitigating the possible social impacts of the introduction of Online Gaming into the daily lives of its users.

WDC operates and directly owns the **"PLAYPIX"** and **"DUPOC"** brands, so it recognizes their significant role in helping to prevent *gambling-related* problems and expressly adopts the World Lottery Association's Responsible Gaming Principles and other international social responsibility

premises regarding Responsible Gaming. In doing so, it undertakes to contribute to making Responsible Gaming an integral part of its daily operations, in such a way as to integrate the very culture of the Company and its employees.

The seven principles of Responsible Gaming adopted by **WDC** are as follows:

1. **WDC** undertakes to adopt reasonable and considered measures to achieve its objectives while taking care to protect the interests of its consumers and vulnerable groups, while preserving the commitments to defend public order within its own jurisdiction of operation.

2. **WDC** will ensure that its practices and procedures reflect the regulations issued by state bodies, its self-regulation and individual responsibility.

3. **WDC** will develop practices regarding responsible gaming and related issues as much as possible, in order to understand relevant information and analyze documented research, keeping up with social advances and studies on the subject.

4. **WDC** will work with stakeholders, including governmental and non-governmental entities, regulators, researchers, health professionals, the general public, to share information, develop research and promote Responsible Gambling as much as possible, and encourage a better understanding of the social impact of gambling.

5. **WDC** will promote only lawful and responsible gambling in all aspects of its activities, including the development, sale and especially the advertising of its products and activities, and will make reasonable efforts to ensure that its agents act in the same way.

6. **WDC** will provide the public with information, in an

accurate and balanced manner, to empower individuals to make informed decisions and choices about gambling-related activities in the jurisdiction in which **WDC** and its brands operate. This commitment requires that:

a. Advertising of **WDC** activities and its products is subject to **WDC** self-regulation and promotes Responsible Gaming practices and informed choices.

b. Accurate information about the games and their associated risks should be provided to individuals, for example, an education program should be organized.

7. **WDC** will endeavor to monitor, test, and revise, when necessary, the activities and practices related to Responsible Gaming. The conclusions reached by **WDC** will be made public.

This Policy also has the following objectives: i) to protect public health; ii) to protect minors, the incapacitated and vulnerable from gambling; iii) to guarantee a safe gambling environment; iv) to prevent gambling; v) to minimize the risks of problem gambling; vi) to provide information to protect gamblers; vii) to encourage healthy and ethical practices and behaviors related to gambling; viii) to plan actions to mitigate the effects on problem gamblers and their families; ix) to provide ongoing technical training on Responsible Gambling to all those involved in gambling.

WDC will seek partnerships with entities related to the research and treatment of gambling-related problems, such as ludopathy, to obtain guidance in making decisions regarding Responsible Gambling.

WDC will also arrange partnerships with research institutes or programs to encourage research into Responsible Gaming.

In addition, **WDC** will participate in associations or initiatives

aimed at promoting and/or developing Responsible Gaming.

Through the effective implementation of the Responsible Gaming Policy, **WDC** can cultivate the trust of users and strengthen its reputation in the market as a responsible, reliable and transparent company.

2. Aspects of Pathological Gambling

Pathological gambling, also known as ludomania and/or ludopathy, is a behavioral pattern of uncontrolled gambling. Such behaviour is extremely harmful and can be characterized by the individual's difficulty in resisting the urge to gamble.

With the increase in betting associated with the feeling of anguish due to withdrawal from gambling, the consequences are the loss and dilapidation of the individual's assets. Such financial losses cause personal, property and family damage.

2.1 Which behaviors are harmful and how to identify them

An important skill for the **COMPANY** and its **EMPLOYEES** in relation to Responsible Gaming is to be able to identify patterns of behavior that indicate gaming pathologies.

Users who spend an excessive amount of time or outside the parameters common on the platform, as well as successive bets after a large financial loss, can represent pathological gambling.

Identifying these attitudes is crucial for the effective

implementation of the Responsible Gambling Policy, because it represents the starting point for the application of measures to restrict and refer gamblers, which will be discussed below.

3. To Whom This Policy Applies

This Responsible Gaming Policy is intended for **WDC** administrators, employees, users, suppliers and business partners.

In addition, the scope of this Policy extends to shareholdings and companies in which **WDC** has predominant control, such as any Special Purpose Entities (SPE) and bidding consortia, if any.

In this way, **WDC**, aware of its social responsibility to the market, intends to ensure that all the necessary efforts are made to prevent pathological gambling.

3.1 Education, Information and Transparency

WDC believes that education is one of the best tools for building a culture of Responsible Gaming inside and outside the company.

For this reason, the following topics define the company's strategies in order to guide its employees, users, partners and suppliers.

3.2 Employee training

As mentioned in section 3, employees and the Company play an essential role in preventing pathological gambling and implementing this policy.

For this reason, **WDC** will provide training for its employees so that they understand and can identify the behavioral characteristics of pathological gambling.

WDC will also level out the company's knowledge of the Principles of Responsible Gaming and the other measures, practices and instruments adopted by the company, detailed below, through information and training sessions made available to employees.

The aim is for employees to build up relevant and practical knowledge about Responsible Gambling, in line with the company's values, while at the same time becoming aware of and raising awareness of the problems related to gambling.

Training and qualification will be mandatory and recorded by **WDC's** human resources department.

This training will facilitate effective compliance with this Responsible Gaming Policy and will cover the following points:

- Guidance on prohibiting underage gambling;
- Deepening knowledge about the main concepts of games, tools, how games work and their resources;
- Relevant and specific guidelines to promote responsible play by each employee in their corresponding role;
- Training to signal to players who show alarming behavior that there may be a problem with the game;

WDC's advanced training for supervisors and executive management will cover the following topics:

- Thorough and in-depth education on problem gambling, with regular meetings and talks;

- Specialized techniques for dealing with clients in situations of stress, addiction or danger;

In addition, annual training sessions will be held to reinforce the initial training:

- Identifying warnings of harmful behavior and how to respond to them;

- How to deal with customers who are playing for keeps period;

- Evaluation of Responsible Gaming resources;

- How **WDC** can contribute to Responsible Gaming at state and national level;

The quality and effectiveness of the training will be measured periodically through employee evaluations.

3.3 Guidance and transparency with punters

Users of the betting platform are the main target of the company's Responsible Gaming Policy.

WDC believes that transparency and consumer information are fundamental characteristics of a Responsible Gaming Policy.

Betting brings with it an expectation of gain and profit, and therefore has a strong influence on the psychological environment of bettors. The more information there is about a particular game, the smaller the gap in expectations between reality and the player.

WDC will therefore provide bettors with detailed and clear information on the characteristics of the games, the betting mechanics, the

prize rules, the odds of winning and the principles of Responsible Gaming. This will enable punters to make informed decisions about the games.

WDC will also provide recommendations for adopting and maintaining moderate gambling habits and on the risk signs of problem gambling, as well as providing information on places and ways that punters can get expert advice if they need it.

WDC will carry out campaigns and adopt measures to raise awareness and sensitize gamblers and the general public, through its marketing and communication channels, about Responsible Gambling, the restrictions on the sale of gambling to minors and the risks related to pathological gambling.

This will be implemented through advertising materials made available at game venues, on **WDC** brand websites, in mobile apps and posters in all the company's sales channels.

4. Responsible Gaming Mechanisms

WDC recognizes that when the desire to gamble rises to the level of pathology, the main factor in the individual's recovery is their own will and intention to get better.¹

However, **WDC**, aware of its role in facilitating the security and recovery of platform users, offers the following tools and measures.

The aim is to enable the well-being of bettors by promoting responsible gambling practices. Thus, users of the platform have the tools and resources they need to manage their gambling behavior in a conscious and healthy way.

Studies show that these tools are more effective if they are optional. Therefore, **WDC** emphasizes that these self-protection mechanisms are optional, depending on the individual's choice to adopt them.²

¹ O'HARE, Carol. *Self-Exclusion - Concepcpt vs. Reality*. Gaming Law Review, vol. 8, no. 3, 2004, p. 190.

² BERNHARD, Bo J.; LUCAS, Anthony F.; JANG, Dongsuk; KIM, Jungsun. University of Nevada, Las Vegas International Gaming Institute. *Responsible Gaming Device Research Report*. 2006, p. 19.

4.1 Information on losses and gains

Research carried out by the University of Nevada in conjunction with the Las Vegas International Gaming Institute found that one of the most effective tools of Responsible Gaming was information about losses and wins.³

WDC will make available, in a specific section of its website and app, the amount of the bettor's losses and winnings over a certain period of time - weekly, monthly and annually.

In this way, the punter will have more clarity about their behavior as a user of the platform, enabling them to identify possible behavioral deviations from pathological gambling.

This information can also help with the reports and follow-ups carried out by **WDC**, in order to identify players who need to be referred.

4.2 Self-exclusion tools

WDC allows punters to opt out of the platform via a specific

section on the company's website and app.

Our self-exclusion system is a vital tool for players who wish to temporarily or permanently leave our platform. Users can choose the period of exclusion according to their needs - it ranges from 24 hours to 30 days and can be customized.

³ BERNHARD, Bo J.; LUCAS, Anthony F.; JANG, Dongsuk; KIM, Jungsun. University of Nevada, Las Vegas International Gaming Institute. *Responsible Gaming Device Research Report*. 2006, p. 24.

During the self-exclusion period, players are not allowed to make deposits or place bets, providing a much-needed break to re-evaluate their gaming behavior.

4.3 Time and financial limits

WDC provides the bettor with information on the time spent on the platform, as well as the amount of money spent on bets.

Given this information, the player can select time limits for accessing the platform. These limits can be set in minutes, hours or days, and any changes to the time limits must be requested directly by the player via our platform.

Players can also select a financial limit, which sets the maximum amount of money they can contribute to the **WDC** platform each month.

4.4 Self-testing and referral

WDC offers a self-test to prevent ludopathy and provides information on support services for those who need help.

Once the self-test has been completed, the gambler will have access to a list of possible support groups, websites of institutes for the prevention of pathological gambling and other information materials, such as contacts for services that specialize in assisting gamblers.

To this end, **WDC** will actively engage with governmental and non-governmental organizations, as well as professionals specializing in the care and treatment of pathological gambling situations.

The aim is to contribute to the development of these services and deepen the understanding of the impact of gambling on punters and society in general.

In addition, **WDC** will implement an online support channel for players who report problems with the game.

This information will appear on all of **WDC's** electronic channels and will be easily accessible.

5. Advertising and Marketing in Responsible Gaming

WDC will guide its advertising and marketing in accordance with the principles of Responsible Gaming, especially when promoting the sale of the games operated by the company.

It is important that **WDC's** advertising material does not show any incentive for underage betting.

WDC is also aware that individuals with financial problems or pathological gambling are highly vulnerable. In this sense, the company undertakes to adopt advertising campaigns that do not incite the idea that

gambling is an alternative to work.

In this sense, **WDC**'s advertising and marketing activities are prohibited:

- Showing underage individuals in leading roles in advertising materials;
- Appearing in media aimed at minors or in places where the majority of the audience is made up of minors;
- Display advertising in the vicinity of schools;
- Be based on themes or languages that appeal to minors;
- Contain symbols, figures, models or celebrities whose purpose is to attract minors;
- Promoting or encouraging excessive gambling habits or conveying false odds of winning or a sense of urgency in placing bets;
- Be aimed at vulnerable groups, such as minors and problem gamblers;
- Exploiting individuals' financial concerns or presenting gambling as an alternative to work, as a way of achieving family, social or financial success, or as a way of solving personal problems;
- Be discriminatory, especially on the grounds of race, nationality, religion, gender or age;
- Promoting irresponsible gambling or encouraging people to gamble beyond their financial means.
- Promote the suggestion that gambling can bring relief from

financial problems or difficulties.

- Contain images of intoxicated individuals.
- False information or promises or misrepresentations of **WDC** games.
- Misrepresenting the bettor's chance of winning the prize.

WDC will take measures with its sales channels and resellers to ensure that advertising and information prohibiting sales to minors is visible.

It will be ensured that advertising and marketing activities comply with legal regulations.

In addition, **WDC** will develop procedures for prior verification of the compliance of the advertising communication strategy, in order to guarantee compliance with the Responsible Gaming Policy.

6. Product Development

WDC will always consider the elements of Responsible Gaming in the development of its lottery games and products. Thus, the games and products developed by **WDC** will be low risk and should not have any special appeal to vulnerable groups and minors.

It will also evaluate the social impact of lottery games and products developed by **WDC**, whether new or already in operation, and reformulate them if scientific data shows factors that increase the risks associated with gambling due to the characteristics of the product offer.

7. Research and Investigation

WDC believes that the development of research into Responsible Gambling is crucial to improving policies to help gamblers suffering from pathological gambling.

For this reason, **WDC** is committed to supporting and promoting impartial, evidence-based studies and research to obtain data on the development of its Responsible Gaming Policy and its effectiveness.

Promoting and encouraging research related to Responsible Gaming includes:

- Active participation in Responsible Gaming surveys.
- Funding and/or support for independent research related to Responsible Gaming;

Research should be focused especially on players, but should also cover the impact of responsible gaming on the wider community.

The main objectives of the research that will be carried out are:

- Players' impression of the relevance and sufficiency of the Responsible Gaming Policy at gaming venues, including whether these policies influence bettors' decisions;
- General awareness of the main aspects related to gaming and how games work;
- Evaluate the activities and behaviors considered to be risky for players' health and habits;
- Evaluate the effectiveness of the employee training program;

- Evaluate the effectiveness of the dealer training program;
- Explore areas for the development of the Responsible Gaming Policy;

WDC's management guideline is to use the results of the surveys carried out on its Responsible Gaming Policy as an element in making strategic and operational management decisions for the games operated by the company.

8. Monitoring, Reporting and Certification

In view of the novelty brought about by the Responsible Gaming Policy, monitoring its implementation is of paramount importance if the policy is to achieve its objectives.

In this way, **WDC** will monitor the degree of application and effectiveness of its Responsible Gaming actions through quarterly reports.

These reports should contain data on employee training, as well as details of the actions provided to players via the **WDC** platform.

The results of this report will be published on **WDC's** communication channels to share the results with Stakeholders.

The aim of this report is to provide an overview of the applicability of of this Responsible Gambling Policy, as well as guiding **WDC's** future strategies to prevent pathological gambling.

International certifications are indicators of the success of the Responsible Gaming Policy, which is why **WDC** will seek certifications recognized in the world market, especially the World Lottery Association's Responsible Gaming Level 3 Certification.

9. General Provisions

WDC's objective in adopting this Responsible Gaming Policy is to uphold the highest standards of corporate social responsibility and to adopt a Policy that is compatible with the highest standards and guidelines established by the World Lottery Association.

With this, we **WDC** to effectively promote responsible gambling, mitigating the risks associated with problem gambling and contributing to the healthy operation of the games operated by **WDC**.

This Policy is and will remain under constant monitoring and evolution, always seeking the greatest possible protection for the player. It will also be widely publicized on **WDC's** website, so that administrators, employees, consumers, suppliers, business partners and other interested parties are aware of it and can consult it freely.

This version of **WDC's** Responsible Gaming Policy was approved by the Board of Directors.