

Responsible Gaming Policy

Effective Date: June 2025

Last Reviewed:

INTRODUCTION

This Responsible Gaming Policy (RGP) sets out the legal, operational, and ethical responsibilities of Peak Progress Partners N.V. ("Operator") regarding the implementation of responsible gaming controls.

All websites of the Operator, including but not limited to <https://ge.casino/>, <https://goldeneggs.casino/> ("Casino", "Website", "Company", "We", "Us", "Our") is owned and operated Peak Progress Partners N.V., a company registered in accordance with Curacao Law, registration No.167287, Address: Trias Building, Hanchi Snoa 19, Willemstad, Curaçao.

This RGP has been developed in accordance with The National Ordinance on Games of Chance (Landsverordening op de Kansspelen (LOK)), Curacao Gaming Authority (CGA) requirements (Responsible Gaming Policy for Licensed Operators), AML/CFT laws of Curacao and international standards including ISO 22458:2022.

This RGP is legally binding for all personnel engaged in operations, customer interaction, marketing, technology, and compliance functions at the Operator.

OBJECTIVES AND SCOPE

The objectives of this RGP include:

- Preventing access to gambling by minors (under 18);
- Identifying and supporting at-risk and vulnerable players;
- Ensuring players have the tools to manage their gambling behaviour;
- Guaranteeing transparency and fairness;
- Providing clear reporting, auditability, and escalation procedures to CGA.

This RGP applies to all systems, interfaces, and staff of the Operator, including customer-facing portals (web and mobile), CRM and marketing platforms, third-party service providers under DPA/SLA, staff, contractors, and affiliated vendors.

AGE VERIFICATION

This RGP provides for the following measures to ensure age verification:

- i. no individual under the age of 18 is permitted to gamble or register on Website;
- ii. upon registration, automated Know Your Customers (KYC) triggers require identity and age verification through valid government-issued documents;
- iii. accounts of suspected minors are suspended and reviewed by Compliance team (Compliance Officer/ Responsible Gaming Officer);
- iv. age-verification logs are retained for five (5) years and are auditable by CGA.

If at any point, despite the control measures in place, the Operator becomes aware that a player is underage, their account will be closed immediately.

RESPONSIBLE GAMING SECTION

The Operator maintains a permanently accessible “Responsible Gaming” page (RG Section) on its Website, which can be accessed from:

- Footer of the Website with the GCA requirements;
- Account control panel;
- Pre-deposit and session timeout prompts for players.

This RG Section includes at least;

- i. risks of gambling;
- ii. signs of problematic play;
- iii. links to support organizations;
- iv. descriptions of RG tools (including, but not limited to, self-exclusion, cooling-off period, limit setting);
- v. legal disclaimers and policies.

The Operator recommends that all players who recognize problematic gambling behavior through self-assessment explore the available responsible gambling tools (for example, Gamblers Anonymous, <https://gamblersanonymous.org/20-questions/>).

BEHAVIOURAL MONITORING

The Operator uses automatic detection of anomalies in player behaviour based on the following factors:

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session patterns;
- Repeated failed transactions due to insufficient funds;
- Reversing withdrawals – players cancelling withdrawal requests multiple times;
- A pattern of Inexplicable extended play sessions (exceeding 6 hours);
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation;
- Frequent changes to RG tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period;
- Players maxing out a credit card;
- Attempts to open multiple accounts to bypass deposit or loss limits.

Flagged accounts are recorded and reviewed by the Compliance team in the Player Account Management (PAM) system and may trigger:

- Educational prompts;
- Personalized RG communications;
- Mandatory setting adjustments;
- Temporary account suspension.

PLAYER TOOLS FOR CONTROL

The Operator provides a comprehensive suite of responsible gaming tools, the availability and accessibility of which are essential for empowering players to manage their gaming behavior in a manner that aligns with their personal, financial, and psychological boundaries.

Every player, upon account activation, is granted access to an intuitive Account control panel, through which a range of protective parameters can be individually set and adjusted.

These include, but are not limited to:

- **Deposit Limits**, which may be configured on a daily, weekly, or monthly basis, and which prevent players from depositing amounts exceeding their predefined thresholds;
- **Loss Limits**, which automatically restrict further gameplay once a player reaches the self-imposed net loss ceiling within a specified timeframe;
- **Wager Limits**, designed to curb excessive betting by capping the total amount staked over defined intervals;
- **Session Time Limits**, that initiate either a forced logout or a mandatory pause once the preset duration is exceeded;
- **Reality Checks**, which consist of periodic on-screen notifications (set at intervals of 30, 60, or 90 minutes), alerting players to the duration and net outcome of their session;
- **Cooling-off Periods**, during which access to gaming services is temporarily suspended at the player's request, and which can range from 24 hours to 3 months;
- **Self-Exclusion Options**, enabling players to voluntarily remove themselves from all gaming activities for fixed periods (1, 3, 5, 10 years or lifetime).

It is expressly stipulated that any attempt to relax or reverse these limits is subject to a mandatory 24-hour waiting period, thereby ensuring that such decisions are made with deliberation and free from the influence of impulsive behavior.

All adjustments to RG settings are recorded in an immutable compliance log, which is securely stored in accordance with CGA regulations and made available for inspection upon request by CGA.

Through this system of proactive control, the Operator affirms its commitment to facilitating an environment where player autonomy is preserved, while systemic protections are in place to mitigate the potential for gambling-related harm.

COOLING OFF AND SELF-EXCLUSION

The Operator offers players two distinct mechanisms to temporarily or permanently suspend their access to gambling services – Cooling Off and Self-Exclusion – with clearly defined options, implementation protocols, and safeguards, as described below.

Cooling Off

Overview and Options:

Players may self-initiate a Cooling Off period via Account control panel, choosing between durations of 24 hours, 7 days, 1 month, or 3 months, and electing scope controls – brand-specific or company-wide – optionally including certain game verticals and marketing opt-out.

Player Choice and Consent:

During the initiation process, players select all relevant options via unticked boxes (ensuring conscious selection), and confirm the decision through a neutral online request, e.g., “You have selected a 1-month cooling-off period. Please confirm.”

Immediate Enforcement:

Upon confirmation, restrictions activate instantly:

- Wagering and deposits blocked per selected scope;
- Withdrawals and account login permitted;

– Marketing communications withheld if opted out.

No Interference or Coaching:

Staff must refrain from influencing the player's decision, offering promotions, or delaying the process. Requests must be processed swiftly.

Reactivation:

At the end of the selected period, account reactivation is automatic, requiring no additional player action.

Self-Exclusion**Duration and Scope:**

Players may initiate Self-exclusion – with mandatory minimum durations of 1 year – and options extending to 3 years, 5 years, 10 years, or lifetime, all applying operator-wide and across all brands and verticals.

Self-Service Process:

The process must be fully online, without staff intervention or email requirement.

After selecting duration, the player confirms via a neutral online request (e.g., "You are choosing a 3-year self-exclusion – please confirm").

Immediate Effects:

Once confirmed:

- i. log-in, wagering, deposits, and gameplay are blocked permanently;
- ii. existing bets/tournaments at the time of request are allowed to complete;
- iii. marketing and advertising communication are fully stopped;
- iv. the system actively prevents creation of duplicate/secondary accounts by self-excluded players.

Civil Law Compliance

Any ante-post bets must be voided and refunded, subject to AML/CFT regulations.

Post-Exclusion Reactivation

Reactivation may only occur after the exclusion period expires, upon explicit written request (chat or email) from the player, and following a 24-hour mandatory reflection period. The Operator will not reinitiate contact to prompt reactivation.

Record Retention and Security

All records relating to exclusion – including requests, confirmations, durations, and any communication – must be securely retained, encrypted, and kept for no less than five (5) years.

Operator-Initiated Exclusion

In exceptional cases where the operator independently identifies high-risk or compulsive behaviour, it may enforce temporary or permanent exclusion after documented assessment. Such actions must be formally justified, documented, and retained for CGA review.

STAFF TRAINING

The Operator recognizes that the consistent and informed application of Responsible Gaming principles across its operations depends heavily on the competence and

vigilance of its staff. To this end, the Operator mandates a comprehensive training regime for all staff whose roles may directly or indirectly influence player interaction, product design, payment processing, marketing, or compliance monitoring.

Every new employee undergoes an onboarding module specifically focused on Responsible Gaming obligations, which includes:

- The identification of behavioral risk indicators;
- Appropriate intervention strategies and tone of communication;
- Legal duties under Curaçao law (including CGA requirements) and internal compliance procedures;
- Technical deployment of RG tools and backend monitoring systems.

In addition to the initial training, all personnel are required to complete annual refresher courses, which are updated to reflect regulatory changes, case studies, and audit findings. These sessions often include scenario-based workshops that simulate real-life customer interactions, enabling staff to apply learned principles in a practical context.

Non-compliance with training obligations results in restricted access to player data systems and may lead to disciplinary measures.

Through these measures, the Operator ensures that Responsible Gaming is not only a matter of policy, but also a living practice embedded in the operational ethos of its team.

MARKETING AND AFFILIATE RESTRICTIONS

The Operator acknowledges its legal obligation to protect individuals who are vulnerable to gambling harm, including those who are self-excluded, subject to a cooling-off period, or classified as high-risk through behavioral monitoring systems.

General Standards and Responsibility:

All advertising, promotional and sponsorship activities must be legal, honest and truthful. In particular, the Operator strictly monitors that marketing does not engage in the following activities:

- Target or be likely to appeal directly to vulnerable individuals, including minors, self-excluded persons, or those experiencing gambling-related harm;
- Promote gambling as a means of solving financial problems, achieving wealth, or gaining social or personal success;
- Imply that skill or experience can influence outcomes of games based on chance (e.g., slots, roulette);
- Use language or imagery that encourages emotional dependency on gambling or portrays gambling as a substitute for emotional, mental, or financial stability;
- Include minors or underage individuals, nor depict them engaging with or exposed to gambling;
- Contain explicit sexual content, including suggestive poses, nudity, or language of a sexual nature;
- Associate gambling with tobacco, drug use, alcohol consumption, seduction, enhanced attractiveness, or other behaviors deemed harmful or socially irresponsible.

Bonus Offers and Promotional Conditions:

- All bonuses and promotions must be communicated with full transparency, including prominently displayed Terms and Conditions (T&Cs) that clearly describe eligibility, wagering requirements, restrictions, and expiration terms;

- No bonus or reward shall be structured in a manner that encourages excessive or compulsive gambling (e.g., loss-based cashback, unattainable turnover thresholds, or time-limited high-risk incentives);
- Where possible, players should be given the option to opt-in or opt-out of participation in promotional offers during registration and at any time thereafter.

All campaigns are subject to pre-approval by the Compliance Officer/Responsible Gaming Officer.

Responsible Gaming Disclaimers

All advertising includes a clearly visible responsible gaming message or slogan.

Third-Party Marketing and Affiliate Governance

The Operator remains fully accountable for all advertising disseminated by or through its affiliates, ambassadors, influencers, or media partners.

To that end:

- i. the Operator make any contracted third-party aware of their RGP and require them to adhere to it;
- ii. materials (copy, creatives, claims) provided to affiliates or created under paid placements must be pre-approved or periodically reviewed.

The Operator shall monitor affiliate campaigns using tracking tools and may require campaign audits, especially in high-volume jurisdictions.

RESPONSIBLE GAMING OFFICER

The Operator has a Responsible Gaming Officer (RGO) as a senior manager with special powers, autonomy, and access rights necessary to ensure compliance with, monitor, and update this RGP. The Compliance Officer may perform the function of the RGO.

The RGO's responsibilities include but are not limited to:

- Supervising the day-to-day implementation of all Responsible Gaming (RG) protocols across the platform;
- Managing the escalation of player behavioral risk flags and overseeing intervention outcomes;
- Reviewing and approving marketing campaigns, bonus programs, and affiliate materials for RG compliance;
- Coordinating compliance reporting to the CGA, including risk trends, training completions, and enforcement actions;
- Facilitating and monitoring the delivery of mandatory RG training to all applicable staff;
- Acting as the internal contact point for all RG-related inquiries, complaints, and player protection issues;
- Advising executive management on regulatory developments and RG performance metrics.

All RGO actions are logged and auditable. Their appointment and functional scope are recorded and reviewed annually in consultation with legal and compliance leadership.

RECORDKEEPING AND REPORTING

The Operator maintains a structured, secure, and retrievable system of records related to RG activities. The objective is to ensure accountability, auditability, and ongoing oversight of all RG mechanisms and interventions.

The following categories of data are retained for a minimum of five (5) years:

- Player-initiated actions (e.g., self-exclusions, RG tool adjustments, bonus opt-outs);
- Incident records triggered by behavioral monitoring and corresponding staff responses;
- Internal RG audits, training logs, staff certification records;
- All external marketing approvals and internal marketing compliance reviews;
- Affiliate tracking reports, communications, campaign archives, and suppression activity.

All RG data is stored in encrypted infrastructure with restricted access. The RGO and Compliance team maintain a live, version-controlled log of interventions and regulatory updates. These records are subject to inspection by the CGA upon request or during scheduled audits.

POLICY REVIEW AND AMENDMENTS

This RGP shall be reviewed and revised:

- i. at least once per calendar year;
- ii. immediately following any regulatory directive, legal change, system-level incident, or audit recommendation issued by the CGA or internal compliance authority.

The RGO is responsible for initiating the review, in collaboration with the Legal and Compliance teams.

Where amendments affect core player protections or the structure of RG tools, a summary of changes is posted on the public RG Section of the Website to ensure transparency.

CONTACT AND SUPPORT

For any questions related to this IPS, please contact:

Email: compliance@goldeneggs.casino

APPROVED BY:

Name:

Position:

Date: