

Overseas Gaming Management N.V.

Responsible Gambling Procedures

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Change and Review History

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1.0	20.02.2025	Policy Creation and Approval	Head of Compliance
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1 Introduction

Overseas Gaming Management B.V. (“the Company”) is committed to promoting responsible gambling practices and providing a safe and enjoyable gaming environment for all players. Gambling should be a form of entertainment, fun, and excitement, not a means of earning income.

The purpose of this policy is to outline the steps and tools provided by the Company to help players gamble responsibly and to mitigate the risk of gambling-related harm, in line with Curaçao Gaming Authority (CGA) requirements.

2 Responsibility

The Compliance Officer duly appointed by the Company, is responsible for overseeing the effective implementation and ongoing monitoring of this Responsible Gambling Policy. This includes ensuring that all measures, tools, and procedures are properly executed and remain compliant with Curaçao Gaming Authority (CGA) requirements.

The Compliance Officer also prepares and submits an annual effectiveness report to senior management and the CGA, detailing the performance and impact of the Responsible Gambling framework.

Furthermore, the Compliance Officer shall maintain comprehensive and secure audit trails of all Responsible Gambling interventions, actions, and communications to ensure transparency, accountability, and continuous improvement in safeguarding players and promoting responsible gaming practices.

3 Definitions

For the purpose of this Policy:

- Account: A unique account created to access the Company’s Service or parts of the Service.
- Company: Overseas Gaming Management B.V. (“We”, “Us” or “Our”).
- Service: The gaming services provided through the Website.
- Website: www.wgmgames.com
- You/Player: The individual accessing or using the Service, or the legal entity on whose behalf the Service is accessed.

4 Responsible Gambling Principles

The Company promotes gambling strictly as a form of entertainment and strongly emphasizes the importance of responsible and controlled play. We urge all players to actively monitor their gambling activity, establish clear personal limits on time and money spent, and take immediate action if they notice any signs of problematic behaviour. Support and resources are available for those who may experience difficulties, and we are committed to fostering a safe, fair, and responsible gaming environment for all.

4.1 Player Responsibilities

Players are expected to engage in gambling responsibly and take proactive measures to ensure it remains a safe and enjoyable activity. In particular, players should:

Set Deposit Limits: Establish in advance the maximum amount of money you can afford to gamble and never exceed this limit. This helps maintain control over your gambling and prevents financial strain.

Avoid Chasing Losses: Accept that losses are part of gambling. Do not attempt to recover losses by placing higher-risk bets, as this can lead to harmful patterns of play.

Set Time Limits: Allocate a reasonable amount of time for gambling and balance it with other personal, professional, and recreational commitments to prevent excessive play.

Play with a Clear Mind: Engage in gambling only when alert and in full control of your faculties. Avoid gambling under the influence of alcohol, drugs, certain medications, or heightened emotional stress.

Take Regular Breaks: Pause frequently to rest and reflect on your play. Recognize signs of fatigue or distraction and step away when necessary.

Maintain a Single Account: Use only one account to ensure accurate monitoring of your gambling activity and to facilitate responsible control of your play.

5 Support and Assistance

The Company is committed to supporting players who may experience difficulties with gambling. Players are encouraged to seek guidance and assistance as needed.

Contact Our Support Team: Our dedicated support team is available to provide confidential guidance and assistance. Players can reach out at:

- Email: support@wgmgames.com

All communications with our support team are treated with the highest level of confidentiality and discretion.

Professional and Independent Support:

For additional professional advice and resources, players may consult independent organizations specializing in responsible gambling:

- **BeGambleAware – Self-Assessment Tool:** A confidential tool to help players evaluate their gambling behaviour and identify potential risks.
 - **Gamblers Anonymous** — “20 Questions” self-assessment:
<https://gamblersanonymous.org/20-questions/>
- **BeGambleAware – Safer Gambling Information:** Comprehensive guidance on how to gamble responsibly, including strategies, support options, and preventative measures.
- **CAGE Questionnaire** — screening tool (adapted for behavioural issues):
<https://www.verywellhealth.com/cage-questionnaire-5216479>

The Company encourages all players to take proactive steps to maintain safe and responsible gambling. This includes regularly completing self-assessment tools, such as Gamblers Anonymous or CAGE questionnaires, to evaluate their gambling behaviour.

The results of these assessments are integrated into the player’s Responsible Gambling (RG) dashboard, allowing players to monitor trends, identify potential risks, and make informed decisions about their gambling activity. By combining regular self-assessment with easy access to support resources, the Company empowers players to keep their gambling safe, enjoyable, and fully under control.

6 Protection of Minors

The Company offerings is strictly intended for use by persons aged 18 years or older. The Company implements robust measures to prevent access by minors and promote safe use of our services.

Key Measures Include:

- Players are required to provide a valid government-issued identification document prior to processing their first withdrawal or when a risk-based trigger is identified during ongoing monitoring.
- Protect Login Credentials: Players should secure their account login details and avoid saving passwords on shared or public devices.
- Safeguard Financial Information: Banking and payment details must never be shared with minors under any circumstances.

- Parental and Guardian Controls: We encourage parents and guardians to implement internet filtering and monitoring tools to restrict access to gambling services by minors. Recommended solutions include, but are not limited to:
 - FamiSafe
 - CyberPatrol
 - Net Nanny
 - GamBlock
- Electronic verification methods may be used to authenticate the identity of players, provided they meet the standards of accuracy, reliability, and data protection established by applicable regulations. All identification and verification records shall be securely retained to ensuring that audit trails remain complete and accessible for regulatory review

If a player is found to be under the age of 18, their account will be immediately closed, all deposits refunded, and any winnings forfeited. Any attempt to circumvent age verification procedures or access the gaming services while underage constitutes a serious violation of the Terms and Conditions and will result in appropriate enforcement action.

The Company remains committed to safeguarding minors and ensuring that gambling remains an activity only for legally eligible players.

7 Self-Exclusion

The Company provides players with the option to voluntarily exclude themselves from gambling activities for a specified period, as part of our commitment to responsible gaming.

How to Request Self-Exclusion:

Players wishing to self-exclude must submit a request to our dedicated support team via:

- Email: support@wgmgames.com

Duration of Self-Exclusion:

Players may request a self-exclusion period ranging from 1 year up to a lifetime, depending on their individual needs. The available fixed-term options are 1, 3, 5, and 10 years, as well as a lifetime exclusion. Once a self-exclusion is activated, the player's account is immediately suspended, and access to all gambling services and related features is strictly blocked for the full duration of the exclusion.

Account Restrictions During Self-Exclusion:

- Accounts will remain inaccessible for the full duration of the self-exclusion period.
- Players are prohibited from creating new accounts during the exclusion period. Any attempt to bypass self-exclusion may result in permanent closure of the original account and forfeiture of any balances.

Support and Guidance:

Our Support Team is available to guide players through the self-exclusion process and provide information on additional professional resources and support services to help manage gambling-related issues.

Self-exclusion is an important tool for maintaining control over gambling behaviour, and the Company strongly encourages players to make use of it whenever needed.

8 Responsible Gambling Tools

To promote safe and responsible play, the Company offers a range of tools and resources designed to help players maintain control over their gambling activities:

- **Deposit and Wagering Limits:** Set limits on deposits and bets to manage spending responsibly.
 - **Other Limits:** Other limits that the company is considering is loss limits, time limits or wager limits.

Any request by a player to increase an existing responsible gambling limit such as a deposit limit, this will only take effect after a mandatory 24-hour period. This delay is designed to ensure that changes to limits are made thoughtfully and to safeguard players from impulsive decisions that may lead to harm. Limit decreases, however, are applied immediately.

- **Time Management and Session Reminders:** Receive alerts to help monitor playing time and prevent excessive gambling.
- **Self-Exclusion Options:** Temporarily or permanently suspend access to gambling services if needed.
- **Account Activity Tracking:** Review detailed records of your gambling activity to maintain awareness and control.
- **Access to Educational Materials and Professional Support:** Obtain guidance on responsible gambling and access external support services if required.
- **Utilizing a reality check function:** provides visible session timers and periodic reality-check popups to help players track the duration of their gameplay and remain aware of their gambling activity. These notifications appear at regular intervals (customized reality check alerts at specific time intervals chosen by the player). Messages displayed will include clearly how long the player has been playing and also display the player's winnings and losses during that play period.
- **Cooling-off:** Opting for breaks by initiating a cooling-off period, durations available for the players are:
 - 24 hours;
 - 7 days;
 - 1 month; and
 - 3 months.

Players are strongly encouraged to utilise these tools to ensure their gambling remains safe, enjoyable, and within personal limits.

8.1 Activation of Exclusion & Cooling-Off

Once a player submits a request for self-exclusion or a cooling-off period, the restriction is activated immediately and without delay. Upon activation, the exclusion applies on any associated brands, and any platforms operated under the same licence or corporate group.

This ensures full protection and prevents circumvention of the restriction across related services. During the entire exclusion period, the player will also be removed from all marketing and promotional communications, including email, SMS, push notifications, and personalised offers. The Company will take all reasonable steps to ensure that no direct or targeted marketing is sent to the player until the exclusion has fully expired.

8.2 Reactivation of Account

Reactivation of an account following a self-exclusion period is not automatic and may only be initiated by the player, strictly after the exclusion period has expired. Requests for reactivation must be submitted in writing through our support email. Upon receiving a reactivation request, the Company will conduct appropriate checks to confirm the expiry of the exclusion, assess the player's eligibility for reactivation, and ensure that no additional responsible gambling concerns are present.

The account will only be reactivated once all verification steps are completed, and the player has reconfirmed their decision to resume gambling.

9 Responsible Gambling Information and Accessibility

The Company ensures that responsible gambling information is highly visible, easily accessible, and prominently displayed across all platforms. A dedicated Responsible Gambling (RG) section is available directly from the homepage, main menu, and website footer, ensuring players can access key tools and resources at any time. This section provides clear links to important features such as deposit and wagering limits, self-assessment questionnaires, cooling-off and self-exclusion options, and information on how players can manage their gambling behaviour responsibly.

In addition player protection and regulatory transparency, the domain footer also includes the Curacao Gaming Authority (CGA) seal, the Company's licence number, and the mandatory 18+ age restriction symbol.

Additionally, players are provided with direct links to reputable international support organisations, including GamCare, Gamblers Anonymous, and other recognised problem-

gambling helplines and counselling services. These resources help ensure that players are informed, supported, and empowered to seek assistance whenever needed.

10 Player Behaviour Monitoring and Intervention Procedures

The Company maintains robust monitoring procedures to identify potential indicators of problematic or at-risk gambling behaviour.

Key indicators include, but are not limited to:

- Unusually frequent deposits within short timeframes;
- Repeated reversal of withdrawal requests;
- Erratic or extended gaming sessions;
- Significant fluctuations in betting patterns;
- Player complaints related to loss chasing, and
- Expressions of distress or financial difficulty.

When such indicators are detected, the system or responsible staff member shall promptly flag the case for review. All flagged cases are to be escalated to the Compliance Officer (CO) for review, intervention, and appropriate follow-up actions in line with the Company's Responsible Gambling Procedures.

The CO shall evaluate each case on its merits, determine the appropriate level of response ranging from player communication and deposit limit recommendations to temporary suspension or self-exclusion and ensure that all actions are consistent with the CGA's regulatory expectations.

Every interaction, observation, and intervention must be accurately recorded and timestamped within the Player Account Management (PAM) system to ensure a complete and auditable history of all Responsible Gambling engagements, transparency, regulatory compliance, and the ongoing protection of players.

11 Training and Development

When a new employee joins our company, particularly those in roles directly aimed at the responsible gambling field such as Customer Support, Payments & Fraud, and the Compliance Officer overseeing the Responsible Gambling program, they would need to undergo obligatory training as part of a structured program designed to identify and address potential signs of problem gambling among players.

This training is integral in equipping employees with the essential skills to recognize such behaviour and respond appropriately. Moreover, they receive comprehensive instruction on the internal protocols and guidelines established by the Company on responsible gambling. Through this training, our staff members are prepared to fulfil their roles effectively and contribute to the promotion of responsible gambling practices within our organization. Additionally, periodic training sessions are tailored to keep them abreast of the latest developments and optimal methodologies in the field, guaranteeing they are consistently knowledgeable and prepared to uphold Overseas Gaming Management's dedication to responsible gambling.

Thorough assessments of the training initiatives are conducted on an annual basis to ensure their continued relevance and effectiveness. Through this evaluation process, we verify that our programs are in line with the latest research findings and integrate feedback from our employees. By consistently reviewing and enhancing these components, the Company adopts a proactive stance in upholding exemplary standards of responsible gambling practices within its operations. Furthermore, employees are equipped with the necessary training to assist players who may be encountering gambling-related issues.

The training curriculum is customized to encompass, at the very least, the following crucial subjects:

- Competent techniques for engaging with players who seek assistance regarding problem gambling issues.
- Instruction on effectively introducing the array of Responsible Gambling tools accessible to players.
- Understanding of the regulatory framework and obligations pertinent to our operational jurisdiction.
- Knowledge with support resources that can be provided to players in search of assistance.

11.1 Training Occurrence

Training sessions will be provided at regular intervals, primarily under the following circumstances:

- Updates in legislation in the jurisdiction we are operating in;
- When there is a new departmental staff joining the team;
- When employees transition to new roles that necessitate specific training;
- Yearly, irrespective of the aforementioned criteria.

Comprehensive training records will be maintained, documenting the training date, content covered, participant names, and assessment results. These records will be retained in

accordance with internal policies and regulatory requirements, ensuring that training effectiveness and staff competency can be continuously monitored and evaluated.

12 Responsible Marketing and Advertising

All marketing and advertising activities conducted by the Company must maintain the highest standards of social responsibility.

Under no circumstances may advertisements target minors, appeal to underage individuals, or portray gambling as a means of generating income or resolving financial difficulties. All promotional materials must clearly present transparent and easily understandable bonus terms and conditions, ensuring players are fully informed before participating in any offer.

Every advertisement, regardless of format or channel, must prominently include a responsible gambling message such as “Please Gamble Responsibly” along with the 18+ sign to reinforce safe gaming behaviour.

Furthermore, the Company requires all third-party affiliates, marketing partners, and external agencies to strictly adhere to these standards. Affiliates must comply with the same responsible marketing policies and are subject to ongoing oversight to ensure that all promotional content remains accurate, ethical, and compliant with Curacao Gaming Authority requirements.

13 Enhance Responsible Gambling Measures

The Company applies a risk-based approach to identify player groups that may require enhanced responsible gambling oversight. Higher-risk segments may include players exhibiting elevated spending patterns (such as VIP customers) or those whose behaviour or transaction methods which include the use of cryptocurrency. This shall indicate a need for closer monitoring based on the Company’s internal risk assessment framework. Classification into these segments is always evidence-driven and reviewed regularly to ensure it remains appropriate and proportionate.

For players identified as higher risk, the Company implements strengthened protective measures tailored to the level of risk identified. These measures may include tighter monitoring of gameplay and transaction patterns, adjusted deposit or loss limits where appropriate, increased frequency of RG reviews, or proactive outreach to discuss safer gambling tools. All interactions and decisions taken are documented to demonstrate compliance with Curaçao Gaming Authority (CGA) expectations and to ensure transparency in the operator’s risk management approach.

In situations where a player exhibits severe, escalating, or persistent indicators of gambling-related harm despite previous interventions, the Company may apply an operator-initiated exclusion. This measure is used only when necessary for the protection of the player and is based on documented evidence of high-risk behaviour. Such exclusions may be temporary or long-term and are reviewed periodically to ensure they remain justified and aligned with the Company's responsible gambling obligations under the Curacao regulatory framework.

14 Conclusion

Overseas Gaming Management B.V. is committed to fostering a safe, fair, and responsible gaming environment. Through adherence to this Responsible Gambling Policy, players are supported in gambling safely, managing risks effectively, and accessing help when needed. The Company continually reviews and enhances its responsible gambling measures to ensure full compliance with CGA regulations and to safeguard the well-being of all players.