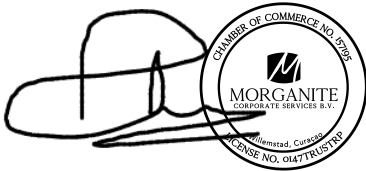


Responsible Gaming and Advertisement Policy

Alisium B.V.

1 Version Control

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3 Introduction and Policy Statement

Alisium B.V. (“**Alisium**” or, the “**Company**”, “**us**”) believes in a responsible attitude towards gambling and the advertisement of gambling related products and services. The Company has implemented measures detailed within this policy to promote and ensure responsible gambling and socially responsible advertisement. The Company believes that industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for those individuals requiring assistance.

For the majority of people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. The Company appreciates that for a small number of people, gambling can have a negative impact on their life. As a result, the Company has developed this Responsible Gaming and Advertisement Policy (the “**Policy**”) which outlines certain practices adopted by us when designing and creating its products, providing services to customers and advertising products and services offered by the Company.

As part of the Company’s responsible gambling initiative, all staff receive responsible gambling training as part of the induction process and annually thereafter.

The Company is also committed to complying with the advertisement regulations which are applicable in the jurisdictions which the Company may operate in and recognises the importance of honest and socially responsible marketing. It is imperative the Company acts responsibly and honestly when creating and publishing marketing and advertising material.

This Policy also outlines the principles upon which the Company will manage marketing campaigns in order to safeguard its business and to ensure the protection of young and / or vulnerable persons.

The Company is bound by the following Regulations in terms of responsible gaming:

- 1) the Curacao Landsverordening op de Kansspelen (National Ordinance on Games of Chance) (LOK)
- 2) Regulations issued by the Curacao Gaming Authority (CGA), namely Responsible Gaming Policy for Licensed Operators, 2025.

It is the responsibility of all employees and applicable parties to ensure compliance with this Policy. Failure to comply with this Policy may have a detrimental effect on the Company.

4 Responsible Gambling

Responsible gambling involves the conduct of gambling in a manner where the potential for harm associated with gambling is reduced.

The Company respects the rights of our Customers, to enjoy the services and to take responsibility for their own conduct, but also acknowledges our own responsibility to our

Customers to provide them with the appropriate tools which enables them to effectively manage their gambling activity in a responsible manner.

The Company's aim is to ensure that Customers using its products and services have access to the required controls which enables them to make informed decisions about gambling.

5 Problem Gambling Behaviour Tracking and Escalation

Problem gambling occurs when there is a lack of control over gambling, particularly the scope and frequency of gambling and the amount of recreational time / money spent gambling.

Gambling may have become a problem if a person is:

- Spending more money and time on gambling than intended
- Starting to lie about gambling habits and hiding them from other people
- Borrowing money to pay for general living expenses – e.g. utility bills, basic groceries
- Taking out loans (including pay day loans) to gamble
- Losing interest in any activity other than gambling
- Finding your work or home life is being affected
- Feeling unable to take breaks when gambling for prolonged period
- Neglecting your own welfare and that of your family

The negative impacts may include:

- Extreme financial losses relative to their sources of income
- Adverse personal effect on the customer, his or her family and friends
- Adverse effect on employers and work performance

The Company's aim is to achieve equilibrium in the provision of gambling services via its customers, taking into account those customers who enjoy our services and use them as a form of entertainment, the wellbeing of our customers who have an acknowledged gambling problem, their families and the community at large.

There are many behaviours that we see from our customers that may highlight a potential gambling problem. Potential indicators of a gambling problem may include:-

- Unrealistic spending patterns that do not align with the customer's demographic profile
- Sudden increases or erratic deposit, wagering or gaming session patterns
- Extended periods of gameplay (they could be spending more time gambling than they had planned to)
- Increased communication with customer support – including requests for bonuses or signs of agitation
- Use of multiple payment methods – particularly attempts to bypass limits
- Cancelling withdrawal requests multiple times
- Frequent changes to responsible gaming tools – such as continuously increasing deposit or loss limits or repeatedly making use of cooling-off period

- customers under 25 years old spending substantial amounts, particularly on casino or virtual games
- customers maxing out a credit card and attempting to register additional cards
- Attempts to open multiple accounts to bypass deposit or loss limits

Frontline duly trained staff are continuously monitoring for the signs of problematic gambling. If spotted any of the above signs (or other behaviour that causes concern), 'interaction' with the customer shall be started. The information about such interaction, including date, specific indicators of concern, actions taken, shall be documented within the customer's profile.

Interaction shall include informing the customer about responsible gaming tools available to him, including deposit limits, time-outs (cooling-off), and self-exclusion.

The following restrictions may be also applied:

- Deposit limits to the customer's account.
- Temporarily suspending access pending further review.
- Excluding the customer in cases of extreme risk.

Where there are reasonable grounds to suspect that problematic gambling may take place, the customer shall be assigned a higher risk profile in terms of problematic gambling and a relevant record shall be kept in the customer's System profile.

Any problematic behaviour identified must be escalated to the Compliance Officer who must assess each case and determine whether further restrictions, exclusions, or responsible gaming interventions are necessary. Relevant records must be documented and kept for at least five years and shall be provided to the Regulator upon request.

6 Information Accessibility

To enable customers to make informed choices and take immediate action when necessary the following information shall be provided throughout the website and application interface at all times.

Homepage Accessibility:

- 1) A clear and visible link to the Responsible Gaming Policy, which shall be made available in English. Other languages may be available, however English version shall prevail to avoid the risk of discrepancies
- 2) Responsible Gaming tools that allow customers to manage their gaming behaviour including, self-exclusion, cooling-off period, deposit limit setting and other responsible gaming measures.
- 3) Information on how customers can contact the Company regarding responsible gaming concerns via email.

Footer Information:

- 1) A clear visual indication that under-age gambling is prohibited.
- 2) The name and the registered address of the Company.
- 3) The official license number issued by the Curacao Gaming Authority.

- 4) A statement confirming the regulatory oversight of the Company's operations by the Curacao Gaming Authority.
- 5) A link to the Responsible Gaming Policy Statement.
- 6) The CGA digital seal
- 7) A link to gambling addiction support resources, e.g. Gamcare, Gamblers Anonymous or Gambleaware or and local support sites of the target market, where available.

The Responsible Gaming Policy shall be also referenced and included within the Terms & Conditions of the website, where information on the available responsible gaming tools, their functionality, and methods of application shall be described.

7 Customer Protection Measures

The Company encourages safer gambling and develops and implements tools and controls into its product offering to enable customers to effectively manage its customers gambling responsibly. Although the below is not an exhaustive description of the Company's efforts, details of customer obligations and the controls offered are explained below.

6.1. Preventing Underage Gambling

Alisium does not permit or condone anyone under 18 years of age to use its products or services. As a result, the Company takes steps to ensure it is not accepting registrations from customers not of the legal age.

Customers shall be asked to confirm they are of legal age by providing their date of birth information as well as explicitly providing confirmation via tick box "I am over 18 y.o." before registration can be completed.

Furthermore, KYC checks shall be performed in accordance with the Company's AML policy and thus the customer's age shall be accordingly verified. If there is any doubt whatsoever of a customer's age prior to KYC or AML milestones being reached, age verification should be undertaken at that point.

If the verification process determines that a customer is underage or the operator has reason to suspect the customer is underage, then access must be denied, and appropriate actions must be taken. Except for any funds frozen in accordance with the AML policy any funds deposited by a minor shall be returned, and any winnings to be forfeited, informing the customer of the reasons for account closure.

Records of all age verification attempts and their outcomes shall be recorded and these records shall be made available for regulatory review, where requested.

6.2. Cooling Off

This tool allows the customers to temporarily restrict themselves from gambling activities for a selected period. It is available at all times within the customer's account and does not require any interaction with the Company. The periods offered are 24-hours, 7 days, 1 month, 3

months. When selected, it is applied immediately. When setting the cooling off period, the customers are offered to proceed directly to permanent self-exclusion and to disable any marketing or promotional emails. Any attempt to open a new account will also be blocked or closed where duplicate accounts are detected.

It is not allowed to:

- Questioning customer's decision
- Offering reassurances to delay the process
- Providing bonuses or promotions as incentives to continue playing

6.3. Self-Exclusion

Self-exclusion is recognised by the gambling industry as a way for customers to control their gambling. The Company has implemented a self-exclusion facility to help customers who report or demonstrate that their gambling is out of control and want assistance to help them stop.

The customers are able to initiate and complete the self-exclusion process fully online, without requiring any email communication or approval from the Company. Information on steps required to self-exclude, duration options available and the benefits of it shall be available to the customer within his customer's account or within the Terms and Conditions. Once self-exclusion is requested it takes effect immediately.

The customers are provided with the following self-exclusion options within their customer's account:

- 1 year
- 3 years
- 5 years
- 10 years
- Permanent

Any period of self-exclusion cannot be revoked before the selected period ends. During the self-exclusion period all gambling-related transactions shall be blocked for the customer preventing further play.

Except for any funds frozen in accordance with the AML policy any remaining funds in the customer's account shall be refunded to the original payment method within two business days (subject to AML policy requirements).

The Company ensures that the customer is excluded from all Company's domains under the same license, where duplicates are detected and should be encouraged to exclude from other gambling sites. Any attempt to open a new account, incl., using the same payment method, will also be blocked or closed where duplicates are detected. The customer will also be removed from all marketing and promotion email lists.

After the self-exclusion period ends, the customer shall confirm in writing their request to unblock the account before this can be implemented. Within the confirmation request the customer shall be reminded regarding responsible gaming, the safeguards that are in place and

encouraged to complete gambling anonymous questionnaire. Only the account with such a confirmation shall be restored.

It is not allowed to discourage self-exclusion by questioning the customer's decision, offering reassurances, providing bonuses, or delaying the process in any way or to encourage self-excluded customers to resume gambling by any means.

It is also not allowed to contact the self-excluded customer during the period of exclusion, excepting any third party, legal or other non-marketing messaging required.

If a self-excluded customer or minor is found to have accessed gambling beyond their self-exclusion choices, the Company shall:

- Except for any funds frozen in accordance with the AML policy, refund all deposited amounts to the customer within two business days.
- Immediately block the customer's account to prevent further play.
- Submit a detailed report to the CGA within five working days, outlining how the issue occurred and what actions are being taken to prevent recurrence

6.4. Deposit Limits

For customers who wish to control the amount of money they are gambling, the Company offers a solution which enables them to set a deposit limit without interacting with the Company.

Customers can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly) allowing them to tailor restrictions to their individual gaming habits. Once a deposit limit is reached, the customer will not be able to deposit additional funds until the specified period resets. Customers can make their limits more stringent at any time, and such changes take effect immediately. However, any request to ease a limit will be subject to a mandatory 7-day waiting period before taking effect.

8 Customer Self-Assessment

Customers are encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits. For this purposes the following additional self-control tools are provided to the customers on the website and application interface:

- 1) Access to a detailed record of betting and wagering history is provided from the customer's account
- 2) Support service examples, including a link to a 20 questions test by Gamblers Anonymous (<https://gamblersanonymous.org/20-questions/>) shall be available on the website at all times.

These tools empower customers to make informed decisions about their gambling activity.

The customers who recognize problematic gambling behaviours through self-assessment are recommended to explore the available responsible gambling tools.

9 Staff Training

All frontline staff and responsible gaming staff shall be provided with training to handle customer interactions professionally and effectively as part of their induction and annually thereafter.

Training should cover:

- Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation).
- Conducting sensitive and structured conversations with at-risk customers.
- Directing customers to appropriate support resources and responsible gaming tools.
- Ensuring all interactions are documented for compliance and follow-up action.

10 Responsible Gaming Principles on Advertising and Marketing

The Company will make sure that its products, advertising or marketing campaigns comply with all applicable laws associated with the advertising and marketing of gambling products. Such advertising and marketing campaigns will be rolled out in a socially responsible manner and in accordance with the guidance outlined in the Regulations and principles detailed in this Policy.

Every advertisement of online gambling shall comply with the following general requirements:

- a) It shall not be indecent, offensive, excessive, aggressive or irresponsible in nature
- b) It shall be based on fact

As well as complying with the following requirements:

- a) It shall not promote gambling as a way to achieve financial success or solve financial difficulties
- b) It shall not be directed at any jurisdictions in which online gambling, or any kind of online gaming, online betting or the like is prohibited
- c) It shall not have any sexual or explicit content, child-friendly content, no emotional manipulation shall be portrayed
- d) It shall not be directed at persons under 18
- e) It shall not contain any material in breach of copyright
- f) It shall not target or appeal to self-excluded customers, individuals with gambling problems, minors, or financially vulnerable people.
- g) It shall not suggest that skill can influence the outcome of games that are purely based on chance
- h) It shall not use social media influencers, celebrities, or entertainers who appeal to minors in any marketing campaign.
- i) Marketing materials shall not feature minors or depict them engaging with gambling content.
- j) There must be no association with unrelated harmful behaviours

- k)** Bonuses and promotions shall be communicated transparently with clear terms and conditions, no aggressive bonus promotions shall be allowed