

**RESPONSIBLE GAMING POLICY**

---

**NETGAME ENTERTAINMENT N.V.**

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## 1. INTRODUCTION

### 1.1. Purpose

This Responsible Gaming Policy (the “Policy”) sets out the framework adopted by NetGame Entertainment N.V. (the “Company”) to support safer gambling outcomes through the design, supply, and ongoing maintenance of its gaming platform, game content, and related technology.

The Company operates as a Business-to-Business (B2B) gaming technology and software provider licensed by the Curaçao Gaming Authority (CGA) under the National Ordinance on Games of Chance (Landsverordening op de Kansspelen, “LOK”). The Company does not hold a direct relationship with end players and does not itself operate player-facing gaming services. However, as a critical supplier whose technology is embedded in the player experience, the Company recognises its responsibility to:

- ❑ design and build responsible gaming (“RG”) functionality into its platform and games at the technical level;
- ❑ make RG tools readily available, configurable, and reliable for use by its licensed Operator clients;
- ❑ ensure that its games and platform do not employ design features that are deceptive, that obscure cost or risk, or that are engineered to encourage excessive or compulsive play;
- ❑ support Operators in meeting their own responsible gaming obligations to players and regulators;
- ❑ maintain awareness of, and align technical capability with, evolving CGA responsible gaming requirements.

*This Policy does not replace or substitute the responsible gaming obligations of licensed Operators towards their players. Operators remain solely responsible for player-facing responsible gaming communications, player risk assessment, intervention, and regulatory reporting in respect of their own player base.*

### 1.2. Scope

This Policy applies to:

- ❑ all games and platform functionality designed, developed, or supplied by the Company to licensed Operators;
- ❑ all employees, directors, and contractors involved in game design, platform development, and Operator support;

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- all responsible gaming tools, application programming interfaces (APIs), and reporting features made available to Operators through the Company's platform;
- all marketing and promotional materials produced by the Company in relation to its games and platform.

*This Policy does not govern: end-player identity or age verification, deposit and payment processing limits set at the player account level, player-facing self-exclusion registers, or regulatory reporting to player-facing authorities - all of which remain the responsibility of the licensed Operator as the player-facing data and licence holder*

### 1.3. History

| Version | Description     | From                      | Author                     |
|---------|-----------------|---------------------------|----------------------------|
| 1.0     | Initial version | 19 <sup>th</sup> May 2026 | Responsible Gaming Officer |

### 1.4. Responsibilities

| Role                                          | Responsibilities                                                                                                                                                                                             |
|-----------------------------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Board of Directors / Senior Management</b> | Ultimate accountability for the Company's responsible gaming approach. Approves this Policy and ensures adequate resourcing of RG functionality.                                                             |
| <b>Responsible Gaming Officer</b>             | Day-to-day responsibility for the Company's RG functionality, monitoring regulatory developments, liaising with the CGA where required, and coordinating with Product and Compliance on RG feature delivery. |
| <b>Product / Game Design Team</b>             | Embeds RG functionality (reality checks, session timers, limit-setting hooks) into game and platform design. Avoids design features that obscure cost, risk, or encourage compulsive play.                   |
| <b>Platform Engineering Team</b>              | Builds, tests, and maintains RG APIs and tools made available to Operators. Ensures RG functionality is reliable, accurate, and tamper-resistant.                                                            |

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|                                  |                                                                                                                                                   |
|----------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Compliance Team</b>           | Reviews RG functionality against CGA and other applicable regulatory requirements. Supports Operator due diligence on RG implementation.          |
| <b>Client/Account Management</b> | Communicates available RG tools and configuration options to Operators. Escalates Operator misuse or disabling of RG functionality to Compliance. |
| <b>All Employees</b>             | Comply with this Policy. Report any identified design or functional issue that could undermine responsible gaming outcomes.                       |

### 1.5. Regulatory Framework

This Policy is adopted with reference to:

- the National Ordinance on Games of Chance (LOK, 24 December 2024) and the CGA Responsible Gaming Policy for Licensed Operators (Version 1.0, 17 April 2025), including the definition of a Vulnerable Person in clause 1.1(h) of the LOK;
- the responsible gaming requirements of other jurisdictions in which the Company's Operator clients are licensed, where the Company's technology must support multi-jurisdictional configuration.

The Company acknowledges that the CGA's Responsible Gaming Policy is directed primarily at B2C licence holders. As a B2B critical supplier, the Company supports Operator compliance by ensuring that the technical capability required by that Policy is available, reliable, and properly documented within its platform.

## 2. GAME AND PLATFORM DESIGN STANDARDS

This section sets out the design standards applied by the Company to minimise the risk that its games or platform contribute to gambling harm. Applies to all games and platform features designed, developed, or supplied by the Company.

- Games must clearly and accurately disclose Return to Player (RTP) information, and RTP/RNG certification must be obtained from a CGA-recognised independent testing laboratory (e.g. GLI or equivalent) prior to deployment.
- Game design must not employ near-miss effects, losses disguised as wins, or other mechanics intended to misrepresent the outcome of play to the player.

- Autoplay features, where offered, must include a maximum number of consecutive automated spins/rounds and must be interruptible by the player at any time without penalty or delay.
- Games must not use light, sound, or visual effects specifically designed to prolong play beyond what is necessary for normal game function.
- Marketing assets and in-game promotional content supplied by the Company must not depict gambling as a solution to financial difficulties, a guaranteed means of success, or as enhancing social, professional, or personal standing.
- New games and material game updates are subject to internal RG design review prior to certification submission.

### 3. RESPONSIBLE GAMING TOOLS AND APIS

This section defines the responsible gaming functionality embedded by the Company into its platform and made available to Operators. Applies to all platform-level RG functionality and the APIs through which Operators access and configure it.

| RG Tool                                  | Functionality Provided by NetGame                                                                                                                                           | Operator Responsibility                                                                                                                                 |
|------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------|
| Deposit, loss, wager, and session limits | Platform-level enforcement engine allowing limits to be set, reduced, increased, or removed via API; reduction is immediate, increases are subject to a cooling-off period. | Surfacing the limit-setting interface to players; setting default limits where required by local law; configuring cooling-off periods per jurisdiction. |
| Reality checks                           | Configurable in-session notifications displaying elapsed time and net win/loss at Operator-defined intervals.                                                               | Enabling and setting the interval; ensuring the notification is presented to the player in line with local requirements.                                |
| Session timers                           | Platform-level session duration tracking and configurable maximum session length with forced pause/logout.                                                                  | Setting maximum session parameters appropriate to the relevant jurisdiction and player base.                                                            |

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|                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |                                                                                                                                                                                             |
|-----------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Self-exclusion              | API supporting immediate, platform-wide enforcement of a self-exclusion instruction across all games supplied by the Company, including blocking of re-registration attempts at the game/platform level for the duration of the exclusion. The platform supports the self-exclusion duration options required by the CGA Responsible Gaming Policy (a minimum of one year, and options of 1, 3, 5, and 10 years and permanent/lifetime), consistent with clause 5.4(2) of the LOK. | Capturing the player's self-exclusion request; integrating with national/regional self-exclusion registers where applicable; notifying the Company's platform of the exclusion instruction. |
| Take a break / cool-off     | Configurable short-term play suspension enforced at the platform level, supporting at least the cooling-off durations required by the CGA Responsible Gaming Policy (24 hours, 7 days, 1 month, and 3 months), with restrictions taking effect immediately.                                                                                                                                                                                                                        | Offering the take-a-break option to players and configuring available durations.                                                                                                            |
| Play and spend pattern data | Aggregated, pseudonymised behavioural indicators (e.g. session length trends, loss-chasing patterns, late-night play frequency) made available to Operators for their own player risk assessment.                                                                                                                                                                                                                                                                                  | Interpreting behavioural indicators, conducting player-level risk assessment, and intervening where appropriate.                                                                            |

NetGame only provides the Operator with the capabilities set out in the "Functionality Provided by NetGame" column, and no liability or obligation is created for NetGame in this respect. The items listed in the "Operator Responsibility" column are provided for context only and do not create any obligation on NetGame; NetGame's responsibility under this Policy is limited to providing and maintaining that functionality.

- All RG tools listed above are enabled by default in the Company's platform and may not be technically disabled by an Operator; Operators may only configure parameters (such

as intervals, durations, or thresholds) within the bounds documented in the Company's technical integration documentation.

- Where an Operator's configuration request falls outside the bounds documented for a given jurisdiction's regulatory minimums, the Company's Compliance Team must review and approve the request before implementation.
- Any attempt by an Operator to disable, bypass, or materially weaken RG functionality below CGA or other applicable regulatory minimums is treated as a material breach of the commercial agreement and is escalated to the Responsible Gaming Officer and Senior Management.

#### **4. UNDERAGE AND VULNERABLE PLAYER PROTECTION**

This section sets out the Company's approach to supporting the prevention of underage gambling and the protection of vulnerable persons, within the limits of its role as a B2B technology supplier. Applies to platform and game features relevant to age and vulnerability safeguards.

- The Company's platform supports integration with Operator-side age verification systems and does not permit game access to be granted to an account prior to confirmation from the Operator's system that age verification has been completed.
- The Company does not design marketing or promotional assets that target or are likely to appeal to minors, including the use of characters, themes, or aesthetics primarily associated with children's media.
- The Company does not distinguish between foreign and domestic vulnerable-person indicators when designing behavioural data outputs; all relevant indicators are made available to Operators on an equal basis.
- The Company supports Operator implementation of jurisdiction-specific vulnerability safeguards (for example, enhanced monitoring thresholds) through configurable risk-indicator outputs described in Section 3.

#### **5. TRAINING AND AWARENESS**

This section sets out the Company's training obligations to ensure employees understand responsible gaming principles relevant to their role. Applies to all employees in Product, Engineering, Compliance, and Client/Account Management functions, and to all new employees as part of onboarding.

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| Audience                          | Training Content                                                                                                       | Frequency                          |
|-----------------------------------|------------------------------------------------------------------------------------------------------------------------|------------------------------------|
| All new employees                 | Responsible gaming fundamentals, this Policy, and the Company's role as a B2B supplier in the player protection chain. | Within 30 days of joining          |
| All employees                     | RG refresher: regulatory updates, case studies, emerging design risks.                                                 | Annual                             |
| Product, Game Design, Engineering | Advanced RG-by-design principles, dark pattern avoidance, RG API specification and testing standards.                  | Annual plus as needed              |
| Responsible Gaming Officer        | Specialist training on CGA RG policy developments, GLI standards updates, and sector typologies.                       | Annual - external course preferred |

Training completion is recorded and maintained by the Responsible Gaming Officer. Training content is reviewed and updated annually, or sooner where there are material changes to the CGA Responsible Gaming Policy or other applicable regulatory frameworks.

### 6. MONITORING, REPORTING AND POLICY REVIEW

#### 6.1. Monitoring

The Responsible Gaming Officer monitors the performance and integrity of RG tools described in Section 3, including periodic testing to confirm that limit, self-exclusion, and reality check functionality operates as documented. Any identified malfunction is treated as a priority defect and escalated through the Company's incident management process.

#### 6.2. Operator Reporting

The Company makes available to Operators technical documentation and, where contractually agreed, aggregated reporting on RG feature usage to support the Operator's own regulatory reporting obligations to the CGA or other applicable authorities. The Company does not submit player-facing responsible gaming reports directly to regulators, as it does not hold the player relationship.

#### 6.3. Policy Review

This Policy is reviewed by the Responsible Gaming Officer and approved by Senior Management on an annual basis, or earlier if:

- ☐ there is a material change in CGA Responsible Gaming Policy or other applicable regulatory requirements;
- ☐ the Company's product offering or Operator base changes materially;
- ☐ a significant RG-related incident or near-miss occurs;
- ☐ new standards affecting RG functionality are introduced.

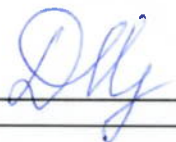
All revisions are documented in the History table in Section 1.3 and communicated to relevant personnel.

#### 6.4. Exceptions

Exceptions to any provision of this Policy may only be authorised by the Responsible Gaming Officer with the approval of Senior Management, and must be documented including the rationale, compensating controls applied, and the approving individual.

#### Acceptance

This Policy has been formally adopted by the Management of NetGame Entertainment N.V. and is binding on all operational units and employees.

| Approved by                                                                                        |                  |
|----------------------------------------------------------------------------------------------------|------------------|
| CCO Signature:  | Date: 19.05.2026 |