

Apollo Sync B.V.

Responsible Gambling Policy

Policy Statement

This Responsible Gambling Policy outlines the measures implemented by the operator to foster a safe, transparent and responsible gaming environment in accordance with the Curaçao Gaming Authority (CGA) guidelines and international best practices. Our commitment is to protect players, prevent problem gambling and promote responsible gaming behaviour.

This Policy is divided into two parts: the first part outlines measures taken by the company to enforce Responsible Gambling and acts as an internal guideline; the second part is available on each website, available to players including guidelines and hyperlinks to request self-exclusion and set limits as outlined in this policy.

Player Protection and Accessibility

We provide clear access to Responsible Gambling information on our homepage and throughout our website. This includes tools for self-assessment, deposit limits, session reminders, cooling-off periods and self-exclusion.

Responsible Gaming information shall be available in English and in the primary language(s) of each player-facing domain or market targeted by the Company. Players can access support resources such as Gamcare, Gamblers Anonymous, and local organisations where applicable.

Website Integration and Footer Requirements:

The Responsible Gambling Section is explicitly referenced within the Terms & Conditions and is accessible no more than one click away from the homepage. To ensure transparency, the footer of our homepage consistently displays:

- A clear visual indication that under-age gambling is prohibited (18+).
- The name and registered address of the license holder (Apollo Sync B.V.).
- The official license number issued by the Curaçao Gaming Authority (CGA).
- A statement confirming the regulatory oversight of the Licensee's operations by the CGA.
- A direct link to the Responsible Gaming Section.

- The official CGA Certificate of Operation Seal, as currently issued and required by the Curaçao Gaming Authority for the specific licensed domain. The seal must be displayed in accordance with the current CGA seal implementation requirements, linked to the CGA's authorised verification page for the applicable domain, and updated whenever the CGA issues revised seal specifications. The former "Certificate of Operation Orange Seal" has been discontinued by the CGA as of 15 October 2025 and shall not be used. The Company shall verify the current applicable seal type against the CGA portal prior to any website deployment.
- A direct link to one or more gambling addiction support resources (e.g., Gamcare, Gamblers Anonymous).

Contacting the Operator Regarding Responsible Gambling Concerns

Players who have concerns about their gambling behaviour or wish to discuss any responsible gambling matter may contact the Company at any time via the following channels:

Email: support@apolosync.vip

Live Chat: Available 24/7 via the website chat function

The Company's RG team will respond to all RG-related enquiries within 1 (one) business day. For urgent matters (e.g., immediate self-exclusion requests), the Company will take action without delay - self-exclusion takes effect immediately upon request. All RG-related communications are treated with the utmost confidentiality and are handled by trained staff.

Age Verification

Strict age verification is enforced during registration using government-issued ID, date of birth validation and secondary checks where necessary. Underage gambling is strictly prohibited and monitored.

Registration requires self-attestation, where the player is required to enter their date of birth and confirm they are over 18 by selecting a designated checkbox.

Parental control tools are recommended to guardians, including Net Nanny (www.netnanny.com), GamBlock (www.gamblock.com) and CyberSitter (www.cybersitter.com).

More information on how age verification is enforced can be found in the

company's AML Policy, which also serves as a general internal guideline.

Account Closure Procedure for Minors

In the event that the Company becomes aware, at any point after registration, that a registered player is a minor (under 18 years of age), the following procedure shall be applied immediately:

Step 1: The player's account is suspended immediately, without prior notice. No deposits, gameplay or withdrawals are permitted from the moment the Company becomes aware of the player's age.

Step 2: The Compliance Officer is notified immediately.

Step 3: The Compliance Officer assesses whether a report to the competent authorities is required under applicable law.

Step 4: Excepting any funds frozen in accordance with the AML policy, all deposited amounts shall be refunded to the player within two business days, and any winnings accumulated by the minor must be forfeited.

Step 5: The account is permanently closed. The player is informed that their account has been closed as they do not meet the minimum age requirement.

Step 6: All relevant records are retained for a minimum of 5 years.

The Company reserves the right to report repeated attempts by minors to access the Services to the appropriate authorities.

Device Sharing - Reminder to Adults

Adults who share devices (computers, tablets, smartphones) with minors or other third parties are strongly advised to take precautions to prevent unauthorised access to their gambling account. These precautions include:

- Using a strong, unique password and not sharing it with anyone
- Logging out of the website after each session
- Not saving login credentials in shared browsers
- Using parental control software (e.g., Net Nanny, GamBlock, CyberSitter) to restrict access to gambling websites on shared devices
- Keeping payment details (card numbers, e-wallet credentials) secure and out

of reach of minors

The Company is not liable for unauthorised access by third parties where the account holder has failed to take reasonable precautions.

Self-Assessment and Behaviour Tracking

Players have access to self-assessment questionnaire outlined in part 2 of this Policy. We monitor deposit patterns, session durations, and behaviour using AI and trained staff to identify signs of harm.

To support self-monitoring, players have access to a detailed record of their betting and wagering history, including timestamps of transactions, for at least the last 6 (six) months directly from their player account. Upon request, extended transaction records will be provided within 10 working days, subject to data retention policies.

Risk indicators include frequent limit changes, reversed withdrawals and unrealistic wagering activity. All concerning behaviour is documented and escalated appropriately.

Vulnerable Gamblers - Structured Identification Process

The Company operates the following structured process for flagging potentially vulnerable gamblers:

STAGE 1 - AUTOMATED FLAGGING

The system automatically generates a 'Vulnerable Player' flag when a player exhibits any combination of the following indicators:

- Deposit frequency exceeds 3 deposits per day for 3 consecutive days
- Repeated failed transactions due to insufficient funds (3+ in 7 days)
- Reversal of a withdrawal within 24 hours of requesting it (2+ times in 30 days)
- Session duration exceeds 4 hours continuously (without a break)
- Customer contacts support more than 5 times in 7 days for bonus requests
- Changes to RG tools (limits increased) more than twice in 30 days, or any attempt to revoke, shorten, bypass, or otherwise circumvent an active self-exclusion or gambling restriction
- Attempts to open a second account after setting deposit or loss limits
- A pattern of late-night gambling sessions (between 01:00 and 06:00 local time) exceeding 3 sessions per week

STAGE 2 - MANUAL REVIEW

Any customer flagged at Stage 1 is added to the RG Team's review queue. A trained RG team member reviews the flag within 1 business day and assesses whether intervention is required.

STAGE 3 - INTERVENTION DECISION

Based on the review, the RG team member classifies the customer as:

- GREEN: No immediate action required; continue monitoring
- AMBER: Proactive contact to be made
- RED: Enhanced intervention required (account suspension, mandatory self-exclusion referral)

STAGE 4 - DOCUMENTATION

All flags, reviews and intervention decisions are recorded in the PAM system with a timestamp and the name of the reviewing staff member.

Any player known to have been declared bankrupt or who has otherwise lost the control or disposal of all or part of his or her property will be immediately classified as a Vulnerable Person and subject to the appropriate account restrictions.

Identification of Additional Categories of Vulnerable Persons

In addition to persons exhibiting signs of problematic gambling behaviour and minors, the Company identifies and restricts the following persons as Vulnerable Persons in accordance with Article 1.1(h) and Article 5.4 of the LOK:

- (a) Persons subject to a gambling ban. The Company shall refuse access to its Services to any person who has been prohibited from participating in Games of Chance, whether by compulsory order of a competent authority or by their own prior request submitted to the Company or to another licensed operator. Where the Company becomes aware of such a prohibition (through player disclosure, cross-operator notification, or regulatory communication), the player's account shall be immediately suspended and the player excluded from all Games of Chance for the duration of the applicable ban.
- (b) Persons who have been declared bankrupt or have lost control of their

property.

Any player who notifies the Company of a declaration of bankruptcy, or in relation to whom the Company becomes aware of insolvency proceedings or loss of control over their assets (e.g., appointment of a guardian or trustee), shall be immediately classified as a Vulnerable Person. The Company shall suspend the player's account without delay and refund any available balance to the originating payment source, subject to applicable legal requirements.

Detection of the above categories shall be supported by:

- Self-disclosure mechanisms in the registration and account management interface prompting players to confirm they are not subject to any gambling ban and are not bankrupt;
- Review of any notifications from the CGA or other competent authorities;
- Ongoing monitoring of customer account activity for indicators of financial distress consistent with insolvency.

All classifications and subsequent account actions shall be documented in the PAM system with a timestamp and the name of the responsible staff member.

Player Risk Profiling

The Company maintains a risk profile for each registered player for the purpose of responsible gambling monitoring. Player profiles are established at registration and updated continuously based on player behaviour. Each player is assigned a RG Risk Level: LOW, MEDIUM or HIGH.

LOW RISK: No RG indicators triggered; normal gambling patterns; no limit changes; no support contact for RG concerns.

MEDIUM RISK: 1–2 RG indicators triggered; some elevated gambling frequency; RG tools used but no escalation required.

HIGH RISK: 3+ RG indicators triggered; reversed withdrawals; failed transactions; extended sessions; or escalated by RG team.

Player risk profiles are reviewed automatically in real time by the monitoring system, manually by the RG Team upon any change in risk level, at minimum quarterly for all HIGH risk players, and at minimum annually for LOW and

MEDIUM risk players.

Player Interventions and Staff Training

Customer support and responsible gaming teams are trained to recognise problem gambling behaviour and conduct sensitive interventions. Escalations are reviewed by a dedicated Responsible Gaming Officer. If this role is temporarily fulfilled by a Compliance Officer, it is strictly mandated that this individual is not the AML/CFT Compliance Officer, ensuring complete separation of duties in accordance with CGA requirements.

Interventions may include communication with the player, setting limits, temporary suspension or full exclusion.

Risk-Based Approach to Monitoring and Intervention

The Company applies a risk-based approach (RBA) to determine the level of monitoring and intervention appropriate for each player:

LOW RISK players: Automated monitoring only. Manual intervention only if an automated alert is generated.

MEDIUM RISK players: Automated monitoring plus monthly manual review. Proactive communication offered (but not mandatory). RG tools offered with explanation of their benefits.

HIGH RISK players: Automated monitoring plus weekly manual review. Mandatory proactive intervention (outreach by RG Team). Account restrictions may be applied. Escalation to Compliance Officer if player declines assistance.

The frequency and nature of intervention shall be proportionate to the player's risk level and the specific indicators observed. All interventions are documented in the PAM system.

Response to Indicators of Problem Gambling

The Company monitors the following key indicators and responds as set out below:

High deposit/wagering frequency: RG Team review; AMBER flag; contact player; offer deposit limit tools.

Repeated failed transactions (insufficient funds): Contact player; review affordability; consider account restrictions.

Reversing withdrawals: Proactive chat intervention; provide self-exclusion information.

Extended unexplained play sessions: Contact player; offer session timer and reality check tools.

Excessive support contact / bonus requests: Flag account; review bonus usage; restrict bonus eligibility if problem gambling signs present.

Frequent RG limit changes: Manual review by RG Officer; contact player; delay limit increases by 7 days.

Maxing out credit card: Contact player; offer cooling-off; consider deposit restriction.

Multiple account attempts (to bypass limits): Block secondary accounts; contact primary account holder; escalate to Compliance Officer.

GENERAL PRINCIPLE: Where 3 or more indicators are present simultaneously, the account is automatically escalated to RED status and the Compliance Officer is notified. The Compliance Officer may impose a mandatory cooling-off period or self-exclusion on the player's account.

Cooling-Off and Self-Exclusion

When configuring Cooling-Off or Self-Exclusion periods, the player must select their preferences (such as duration, vertical, brand, and marketing opt-out) via tick-boxes. In compliance with regulatory standards, these tick-boxes must not be pre-checked.

Players may activate cooling-off periods (24h, 7d, 1m, 3m) directly on the website. Players can choose to apply this restriction to specific game verticals, specific brands, or all gambling activities. The Company may, where reasonably necessary for player protection, apply a broader restriction than that selected by the player. During a cooling-off period, no bonuses or marketing materials will be sent, but player funds remain fully accessible for withdrawal. Following the expiry of the cooling-off period, the account may be reactivated. Where the cooling-off

was applied at the player's request as a responsible gaming measure, the Company may require the player to actively confirm that they wish to resume gambling before reactivation is completed. In all cases, no marketing communications shall be sent to the player during the cooling-off period or in connection with the account reactivation.

All Cooling-Off restrictions must take effect immediately upon submission. The operator must not question the player's decision, delay the activation process, or offer bonuses to encourage the player to continue playing.

In accordance with CGA regulations, the Company offers players the following mandatory duration options for self-exclusion: 1 year, 3 years, 5 years, 10 years, and Lifetime.

A player who voluntarily identifies themselves as experiencing problematic gambling behaviour and who requests, in writing, to be excluded from participating in Games of Chance shall be excluded by the Company for a minimum period of twelve (12) months from the date of the request, in accordance with Article 5.4(2) of the LOK.

Once a self-exclusion has been applied, the request shall be IRREVOCABLE for the entire duration of the exclusion period selected by the player. The Company shall not accept, process or give effect to any request by the player to revoke, shorten or suspend the self-exclusion while it remains in force, regardless of the reason given by the player. No member of staff is authorised to lift a self-exclusion during its active period.

Mandatory duration options available to the player are: 1 year, 3 years, 5 years, 10 years, and Lifetime.

Reactivation requests may only be submitted after the full exclusion period has expired. Upon receiving a reactivation request, the Company shall conduct a responsible gaming review before restoring access.

Self-Exclusion Implementation and Post-Exclusion Protocol:

- Initiation: Players can initiate and complete the process fully online. Self-exclusion requests submitted through the self-service tool take effect immediately upon confirmation. Requests received by email or live chat shall

be manually actioned without undue delay and, in any event, as soon as reasonably practicable after verification that the request originates from the account holder.

- **Active Wagers:** From the moment self-exclusion becomes effective, the player shall not be permitted to participate in any further gambling activity. Unresolved ante-post bets will be voided and the staked amounts refunded. In-running tournaments shall be closed and any eligible balance returned to the player. Progressive jackpot contributions remain in the relevant pool, but the player forfeits participation. No outcome shall permit further participation by the self-excluded player, and player protection shall prevail over commercial or promotional considerations in all cases.
- **Payment Blocking:** Any payment methods known to be directly used by the self-excluded player will be blocked for future use.
- **Reactivation:** After the self-exclusion period ends, the player must request in writing the unblocking of the account. Before restoring the account, the Company must provide a message regarding responsible gaming, remind the player of the available responsible gaming safeguards and tools, and encourage them to complete the Company's responsible gaming self-assessment questionnaire and/or the CAGE gambling self-assessment available on the website.

Procedure for Players Identified as Vulnerable Persons

Upon a player being classified as HIGH risk or upon a player voluntarily disclosing vulnerability, the following procedure is followed:

Step 1 - IMMEDIATE ACTION: The RG Team contacts the player within 1 business day via their registered email and/or live chat. The communication is empathetic, non-judgmental and focused on the player's wellbeing.

Step 2 - OFFER OF TOOLS: The player is offered a range of RG tools, including deposit limits, cooling-off periods and self-exclusion. Information about external support organisations (GamCare, Gamblers Anonymous, Gambling Therapy) is provided.

Step 3 - ACCOUNT MEASURES: Where the Company identifies a serious or immediate risk of gambling-related harm, the Company may apply protective account measures without the player's consent, including temporary suspension, restriction of deposits, removal from marketing, or mandatory exclusion from gambling activity, where such measures are proportionate to the risk identified.

Step 4 - **MARKETING EXCLUSION:** Upon classification as a vulnerable person, the player is immediately removed from all marketing and promotional communications.

Step 5 - **ESCALATION:** If the player's condition appears to present an immediate risk of harm (e.g., references to financial ruin or self-harm), the matter is escalated to the Compliance Officer immediately. Where a player's communications indicate an immediate risk of serious harm to self or others, the matter shall be escalated internally without delay. The Company may contact emergency services, law enforcement, or other competent authorities only where reasonably necessary for safeguarding or where otherwise required by law.

Step 6 - **DOCUMENTATION:** All steps taken under this procedure are documented in the PAM system.

Financial Limits and Reality Checks

As a general principle, the Company does not offer any credit to players for the purpose of wagering. All gameplay must be funded by cleared balances in the player's account.

Where a player changes a deposit limit, any request that makes the limit more restrictive shall take effect immediately. Any request that makes the limit less restrictive shall be subject to a cooling-off period of at least 24 hours, or such longer period as required by law, regulation, or Company controls.

Reality checks (session timers, activity summaries) are implemented with the option to customise reminders. Players must acknowledge these messages before continuing.

Automated and Manual Notifications for Concerning Behaviour

The Company employs automatic and manual pop-up notifications to respond to concerning gambling behaviour. These notifications are designed to prompt players to reflect on their gambling activity and to access RG tools.

AUTOMATIC NOTIFICATIONS are triggered when:

- A session duration exceeds 60 minutes (reminder at 60, 90, 120 minutes)
- A player's losses in a single session exceed their set limit
- A player has deposited more than 3 times in a single day
- A withdrawal reversal is detected

MANUAL NOTIFICATIONS may be sent by the RG Team when:

- A player is flagged as AMBER or RED risk level
- Concerning patterns are identified during a manual review

All notifications require acknowledgement from the player before gameplay can continue. The notification provides information about RG tools available and links to external support organisations.

Marketing and Advertising Standards

Marketing must not target minors, vulnerable individuals or promote gambling as a financial solution. All content must be age-gated and compliant with relevant local media guidelines.

Affiliates and influencers are contractually required to uphold responsible gaming standards. No promotional messages are sent during exclusion or cooling-off periods.

Additional Advertising and Marketing Requirements

In addition to the above, the Company ensures that all marketing and advertising materials comply with the following requirements:

(1) No targeting of Vulnerable Groups: Marketing is not directed at persons identified as problem gamblers, self-excluded players, minors or other vulnerable groups.

(2) No portrayal of Gambling as Investment: Marketing materials shall not suggest that gambling is a reliable means of generating income or that losses can be consistently recovered.

(3) No misrepresentation of Skill vs Chance: Marketing shall accurately represent the nature of each game (skill-based vs chance-based).

(4) No Emotional Manipulation: Marketing shall not exploit personal hardship, loneliness or other emotional vulnerabilities.

(5) No content featuring minors: Marketing materials shall not feature persons under 18 or depict scenarios that would appeal primarily to minors.

(6) Transparent bonus communications: All bonus and promotional offers must state key wagering requirements and conditions clearly and prominently. Operators must not use bonuses to encourage excessive gambling.

(7) Third-party compliance: All affiliates, brand ambassadors, influencers and sponsored entities are contractually required to comply with this RG Policy and the Company's advertising standards. Contracts with such parties must include explicit RG compliance obligations. The Company is responsible for all materials produced by or on behalf of such third parties.

(8) Mandatory RG message: All advertising materials (online, social media, email) must include a clearly visible responsible gambling message or slogan, such as: 'Gambling can be addictive. Play responsibly.' or equivalent CGA-approved wording.

(9) No Explicit Content: Advertising, messaging, or any communications shall not contain any overt sexual or pornographic imagery or suggestion.

(10) No Encouragement of Unrelated Harmful Behaviours: There shall be no linkage in marketing between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.

Regulatory Compliance and Reporting

All exclusion, limit and risk events are documented in real time. Reports are submitted to the CGA as required. Violations (e.g., self-excluded player activity) trigger a full investigation and response report within five working days.

All changes to this policy are documented and submitted to the CGA as per Clause 12.1 of the LOK.

Record-Keeping Policy

The Company maintains comprehensive records of all Responsible Gambling interactions and events. The following records are retained for a minimum of 5 (five) years from the date of the relevant event or the end of the business relationship (whichever is later), unless a longer retention period is required by specific legal obligations:

- All self-exclusion requests, including date of request, duration selected and confirmation of implementation
- All deposit limit, loss limit and session limit settings and changes, including

the date and time of each change

- All cooling-off period activations
- All RG interventions conducted by staff, including the date, nature of the intervention, outcome and staff member responsible
- All RG-related communications with players (emails, chat logs, letters)
- All player self-assessments completed on the website
- All RG risk flags generated by the monitoring system and the outcome of the review

Records are stored in the Company's PAM system and are accessible to the Compliance Officer at all times. The CGA may request access to these records at any time.

Recording of RG Interactions

The Company records ALL responsible gambling interactions in the PAM (Player Account Management) system. This includes, without limitation:

- Date, time and nature of every RG intervention (automated and manual)
- Name of the staff member conducting the intervention
- Summary of the player's response to the intervention
- Any limits, cooling-off periods or exclusions applied
- Outcome of the interaction and any follow-up actions required

These records are retained in the PAM system for a minimum of 5 years and are accessible to the Compliance Officer and the CGA upon request. Monthly reports summarising RG interactions and outcomes are provided to the Compliance Officer for review.

Responsible Gaming Oversight

The dedicated Responsible Gaming Officer (or a designated non-AML/CFT Compliance Officer) oversees policy implementation and reports annually to Executive Management. Updates are made proactively based on player behaviour trends, regulatory changes and operational needs.

Version Control

The Company is constantly improving its policies to ensure best practice and must notify the CGA of all changes and therefore requires a version control to keep track of all changes. Version Control is updated each time whether there is a change in the internal Policy or the version available on each website.

Version 1.1 May-01-2026- Drafted by Compliance Officer

PART 2 - RESPONSIBLE GAMING INFORMATION FOR PLAYERS

Introduction

Apollo Sync B.V. is promoting responsible behaviour in gaming as a part of customer care and social responsibility policy. We see it as our obligation to you, our customers, to guarantee that you have a positive wagering experience on our site while also being mindful of the social and financial consequences of problem gambling.

Maintaining Control

Gambling should be regarded as a recreational activity rather than a source of income. To keep your gambling habits under control, we suggest you keep in mind the following points:

- Gambling should be done moderately and as a source of entertainment rather than a legitimate way of gaining money
- Avoid loss-chasing and amplifying your betting - there is always another day
- Only bet when you can accept a loss
- Keep in mind the amount of time and money you spend
- If you need a break from gambling, you can activate self-exclusion from one or all products by contacting Support
- If you have any concerns regarding your gambling behaviour, please contact one of the organisations referred to below

Recognizing a Problem

If you are concerned that gambling has had a harmful impact on your life, we encourage you to honestly answer the CAGE Questionnaire (Adapted for Gambling):

- **C - Cut Down:** Have you ever felt you should cut down on your gambling?
- **A - Annoyed:** Have people annoyed you by criticizing your gambling habits?
- **G - Guilty:** Have you ever felt guilty about your gambling?
- **E - Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results:

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

If your results indicate problematic gambling behaviours, we strongly recommend

exploring our available responsible gambling tools and contacting one of the support organizations below.

Gambling Help Organisations

GamCare, the main authority across Great Britain providing counselling, advice, and practical assistance in tackling the societal consequences of gambling: www.gamcare.org.uk. Confidential helpline: 0808 8020 133. Non-UK residents can contact GamCare for details of international support organisations.

Gamblers Anonymous is a community of men and women who have grouped together to address their own gambling issue and to help other compulsive gamblers in doing the same. There are regional communities around the world: www.gamblersanonymous.org.uk

Gambling Therapy offers help and counselling to anyone who has been harmed by gambling: www.gamblingtherapy.org

If you are a parent or a Guardian sharing access with Minors, parental control tools are recommended including but not limited to Net Nanny (www.netnanny.com), GamBlock (www.gamblock.com) and CyberSitter (www.cybersitter.com).

A handwritten signature in black ink, consisting of a large, stylized 'D' followed by several loops and a long, sweeping underline.