

Responsible Gaming Policy

May 22, 2026

This Policy contains provisions applicable to the website of the company JarvisDelivery B.V., acting under the laws of Curaçao and is licensed by the Curaçao Gaming Control Board since to offer games of chance under license number OGL/2024/244/0341 in accordance with the National Ordinance on Offshore Games of Hazard (Landsverordening buitengaatsse hazardspelen, P.B. 1993, no. 63) (NOOGH), (hereinafter referred to as the "Company" or "We").

1. Purpose

The Company is committed to promoting responsible gaming and protecting players from the risks associated with gambling addiction. This policy outlines the self-exclusion process, deposit limits, reality checks, and intervention measures in compliance with the Curaçao Gaming Authority (CGA) Responsible Gaming Policy.

2. Responsible Gaming Measures and Tools

The Company implements a comprehensive suite of responsible gaming measures and tools designed to support players and ensure a safe gaming environment, aligning with the latest requirements from the Curacao Gaming Authority.

2.1. Age Verification

- Players must confirm they are 18 years or older during the account registration process.
- The Company requires government-issued valid ID verification (such as a passport, national ID, or driver's license) to confirm legal age.
- Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification, may be undertaken by the Company at its own discretion, but do not supersede the government-issued document requirement.
- Any accounts found to belong to underage players will be immediately closed, all deposits (with deduction of the relevant administrative costs, such as bank fees, refund fees, etc.) will be refunded, and winnings will be forfeited.

2.2. Self-Assessment

Players are encouraged to assess their gambling habits using self-assessment tools provided on the Responsible Gaming page. These tools include a detailed betting and wagering history and recognized screening questionnaires, such as:

- Gamblers Anonymous 20-Question Quiz ([Visit Here](#))
- CAGE Questionnaire (Adapted for Gambling):
 1. **C – Cut Down:** Have you ever felt you should cut down on your gambling?
 2. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
 3. **G – Guilty:** Have you ever felt guilty about your gambling?
 4. **E – Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting 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 a player recognizes signs of problematic gambling, they should consider using responsible gaming tools such as deposit limits, cooling-off periods, or self-exclusion.

2.3. Behavior Monitoring

The Company actively monitors player behavior for signs of problem gambling, including:

- Sudden increases in deposits or betting frequency
- Extended play sessions without breaks
- Repeated requests to reverse withdrawals
- Multiple failed payment attempts
- Increased communication with support regarding bonuses or financial concerns
- Maxing out a credit card
- Attempts to open multiple accounts to bypass deposit or loss limits.

Players identified as exhibiting at-risk behaviour will be informed of the Responsible Gaming tools available, such as deposit limits, cooling off, and self-exclusion options. The Company will follow a clear escalation protocol where appropriate, which may include:

- Applying mandatory deposit limits to the player's account.
- Temporarily suspending the account pending further assessment.
- Permanently excluding the player in cases of severe or persistent risk.

Under no circumstances the Company will use Responsible Gaming measures as a pretext to prevent or delay legitimate player withdrawals.

2.4. Player Risk Profiles

The Company establishes and maintains player risk profiles to support the identification and assessment of potential gambling-related harm. Player profiles may be categorized as low, medium, or high risk based on factors such as self-assessment results, deposit activity, betting frequency, session duration, use of Responsible Gaming tools, failed payment attempts, withdrawal reversal requests, customer support communications, and other indicators of concerning behaviour. Risk profiles are reviewed and updated where new information becomes available, and appropriate interventions may be applied according to the assessed level of risk.

2.5. Automatic and Manual Pop-Up Notifications

The Company may employ automatic or manual pop-up notifications in response to concerning behaviours, including extended play, rapid increases in deposit or wagering activity, repeated failed payments, repeated withdrawal reversal requests, or other indicators of potential gambling-related harm. Such notifications may remind players of the time spent gambling, amounts deposited or lost, available Responsible Gaming tools, and options to take a break, set limits, or contact support.

2.6. Cooling-Off

- Players may activate a cooling-off period for **24 hours minimum, 7 days, 1 month, or 3 months**.
- Players may activate a cooling-off period for all gambling activity or on individual product verticals, for example, all casino games or slots only.
- Players may activate a cooling-off period with marketing opt-out.

- Cooling-off restrictions take effect immediately and will be enforced according to the Player's selections. The Company will only request a confirmation from the Player for the elected periods 1 or 3 months.
- During this period, players cannot deposit, place bets, or access gaming features but their funds remain accessible for withdrawal.
- Marketing materials will not be sent to Players during their Cooling-off period if they have opted out.
- Players may not revoke a cooling-off period early but may request a longer exclusion period at any time.
- Accounts will be automatically reactivated after the selected Cooling-off period expires. No further action is required by the Player.

2.7. Self-Exclusion Options

Players may self-exclude from gambling activities for the following periods:

- **1 year (minimum requirement)**
- **3 years**
- **5 years**
- **10 years**
- **Lifetime** (permanent self-exclusion)

Once self-exclusion is activated, it cannot be revoked before the period expires.

2.7.1. Activation Process

- Players can initiate and complete self-exclusion from all gambling activities fully online without requiring email communication and support approval.
- Players must confirm their self-exclusion decision by accepting the terms of exclusion.
- Any remaining account balance, excluding active bonuses, will be refunded within two business days to the player's original verified payment method with deduction of the relevant administrative costs, such as bank fees, refund fees, etc.
- Activation of a self-exclusion by a Player is irreversible and irrevocable for the duration of the exclusion period selected.

- The player must complete any tournaments that are in-running at the time of the self-exclusion.
- Contributions to progressive jackpots that were made by the player through gameplay prior to the self-exclusion request remain in-situ, but the player is no longer entitled to participate with the jackpot after the self-exclusion is in effect.

2.7.2. Marketing and Account Restrictions

- Self-excluded players will be removed from all marketing and promotional lists immediately.
- The Company will not send promotional materials to self-excluded players.
- Players who attempt to reopen accounts during self-exclusion will be denied access.
- The Company will implement identity verification checks to prevent self-excluded players from creating new accounts.

2.7.3. Reactivation Process

- After the self-exclusion period ends, the Player should request by email or chat the unblocking of the account.

2.7.4. Company-Initiated Exclusion

The Company may exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour.
- The player attempts or engages in criminal activities through the Company's Website.
- The Company may not exclude players solely on the basis of the amount of their winnings.

2.8. Deposit Limits and Reality Checks

2.8.1. Deposit Limits

- Players can set deposit limits for **daily, weekly, or monthly** periods.
- Deposit limits apply immediately when lowered. If a player requests to increase the limit, a **24-hours waiting period** applies before activation.
- Any resolved or unresolved wagers made prior to the deposit limit being set in place remains unaffected regardless of the limits set.

- In addition to deposit limits, the Company may offer or consider other Responsible Gaming limits, including loss limits, wager limits, and time limits, where appropriate and in line with the Company's target player base, product offering, and applicable market requirements. Such limits are intended to help players manage their gambling activity and reduce the risk of gambling-related harm.

2.8.2. Reality Checks

- A session timer will be displayed while a player is logged in.
- Players will receive automated reality check notifications at set intervals (e.g., every 60 minutes) detailing:
 - Time spent playing
 - Total deposits and withdrawals
 - Net win/loss for the session
- Players must confirm the message before continuing gameplay.

3. Information Accessibility

The Website features a dedicated Responsible Gaming Section (RG Section) that is easily accessible from the homepage and is referenced within Terms & Conditions, in full compliance with the CGA policy. This section provides comprehensive and understandable information about responsible gaming, including practical tips on how to keep gambling within safe limits, education on responsible gaming tools, information that corrects common misperceptions about gambling, details on game functionality, and information on odds. The website footer also contains a clear indication that underage gambling is prohibited, the operator's name and address, the official license number, a statement confirming regulatory oversight by the CGA, the Company's CGA digital seal, and direct links to reputable gambling addiction support resources.

The Website provides direct links to the following external organizations that offer support and assistance to individuals experiencing problem gambling:

3.1. Website Blocking Software

Players who wish to restrict access to gambling websites may consider using third-party blocking software. Examples of available website-blocking tools include BetBlocker at betblocker.org, GamBlock at gamblock.com, and Gamban at gamban.com. These tools are

provided by independent third parties, and the Company is not responsible for their operation, availability, or effectiveness.

Organization Name	Contact Information	Services Offered
GamCare	Website: https://www.gamcare.org.uk/	Provides advice, information, and support for anyone affected by problem gambling. Offers a helpline, online chat, and forums.
GambleAware	Website: www.begambleaware.org	Offers National Gambling Helpline, online resources, digital support, counselling and therapy.
Gamblers Anonymous	Website: www.gamblersanonymous.org	A fellowship of individuals who share their experiences and support each other in recovering from compulsive gambling.
Gambling Therapy	Website: https://www.gamblingtherapy.org/	Offers free, global, online support and advice to anyone affected by gambling. Provides live chat, email support, and online groups.
Gordon Moody	Website: https://www.gordonmoody.org.uk/	Offers residential and non-residential treatment programs for severe gambling addiction.
Curaçao FMA (Residents)	Address: Oosterbeekstraat 11, Shèr Asil. Telephone: 461-5977 - 670-5544. E-mail: info@fma-curaçao.com . Website: www.fma-curaçao.com .	Provides information, counseling, and treatment for gambling addiction specifically for residents of Curaçao.

The Website also provides clear and accessible information about the functionality of each game, including details on randomness, house edge, odds of winning, and payout ratios, empowering players to make informed decisions about their gaming choices, as mandated by the CGA policy.

3.2. Shared Devices and Protection of Minors

The Company reminds adult players to take precautions when sharing devices with minors or other individuals. Players should safeguard their usernames, passwords, payment details, and access credentials, should not allow minors to access their account, and should log out after each session, particularly when using shared or family devices.

4. Employee Training

All relevant employees, including customer service and Responsible Gaming staff, undergo comprehensive training programs on the Website's Responsible Gaming Policy and procedures, in accordance with the requirements of the CGA policy and general best practices. This training includes detailed instruction on how to identify the signs of gambling distress in

players, how to conduct sensitive and effective conversations with at-risk individuals, and how to direct them to the appropriate support resources and responsible gaming tools. The training content is updated regularly, at least on an annual basis, to ensure that staff remain informed about the latest regulations and best practices in responsible gaming.

5. Marketing and Advertising

All marketing and advertising activities undertaken by the Company adhere to responsible advertising standards, ensuring that they do not target vulnerable individuals or portray gambling as a means of financial gain or investment, consistent with the CGA policy. Measures are in place to prevent advertising from being directed towards minors or individuals who have self-excluded from the Website. All promotional terms and conditions are presented in a clear, transparent, and easily understandable manner. All advertising materials include a prominently displayed responsible gaming message. The Company takes responsibility for ensuring that any third-party affiliates also adhere to these responsible advertising guidelines.

5.1. Additional responsible advertising standards:

The Company must not engage in irresponsible advertising, including advertising that targets Vulnerable Groups, minors, self-excluded players, or individuals showing signs of gambling-related harm. Marketing materials must not portray gambling as an investment, source of income, or solution to financial problems, and must not misrepresent the role of skill versus chance in gambling outcomes.

Marketing and advertising materials must not use emotional manipulation, exploit financial distress, loneliness, social pressure, fear of missing out, or other vulnerabilities, and must not contain explicit content. Marketing materials must not feature minors or depict minors engaging with gambling content. Advertising must not encourage unrelated harmful behaviours, including excessive alcohol consumption, drug use, reckless conduct, or other unsafe behaviour.

Bonuses and promotions must be communicated transparently, with clear, accurate, and easily understandable terms and conditions. The Company must not use bonuses, incentives, or promotions to encourage excessive gambling, chasing losses, or continued play by players showing signs of gambling-related harm.

The Company is responsible for advertising and marketing materials provided to or distributed by affiliates, representatives, sponsorship partners, ambassadors, social media influencers, and other third parties acting on behalf of or in cooperation with the Company. The Company will make contracted third parties aware of this Responsible Gaming Policy and require them to

comply with the Company's responsible advertising standards. All advertising must include a clearly visible Responsible Gaming message or slogan.

6. Policy Implementation and Review

To ensure the effective implementation and enforcement of this Responsible Gaming Policy, the Company has established robust internal controls and procedures. The effectiveness of this policy and its impact on player behavior will be regularly monitored and evaluated. This policy will be subject to periodic review and updates to reflect any changes in regulations, advancements in best practices, and the evolving nature of the Company's operations. The Company has appointed a dedicated Responsible Gaming personnel who is responsible for overseeing the implementation and enforcement of this policy, and this individual will report to the management team at least once every twelve months on the policy's effectiveness and propose any necessary enhancements. The Company will also regularly assess the uptake of responsible gaming tools and make updates as necessary to increase participation in player protection measures. For any responsible gaming concerns, contact our support team at legal@jarvisdelivery.com

6.1. Responsible Gaming Contact Procedure

Players may contact the Company regarding any Responsible Gaming concern by emailing legal@jarvisdelivery.com or by contacting the customer support team via live chat available on the Website. Upon receipt of a Responsible Gaming concern, the support team will review the request, provide information about available Responsible Gaming tools, escalate the matter to the Responsible Gaming personnel where appropriate, and record the interaction in the PAM system.

6.2. Record-Keeping and PAM System Records

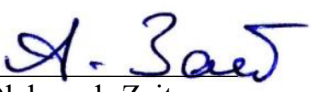
The Company maintains accurate records of all Responsible Gaming measures, player requests, risk assessments, interventions, account restrictions, cooling-off periods, self-exclusions, limit changes, and Responsible Gaming-related communications with players. These records are retained in accordance with applicable legal, regulatory, licensing, AML, data protection, and operational requirements. Access to such records is restricted to authorized personnel only and may be made available to the regulator or competent authority where required by applicable law or licence conditions.

All Responsible Gaming interactions with players, including email, chat, telephone or other support communications, internal assessments, manual interventions, automatic or manual

pop-up notifications, applied restrictions, and follow-up actions, are recorded in the Company's PAM system.

6.3. Complaints and Alternative Dispute Resolution

Where a player has a complaint or dispute that cannot be resolved directly with the Company through the available support channels, the player may contact the Company's alternative dispute resolution provider: EGIS – FZCO, a company incorporated in Dubai with trade licence number 22105 and registered address at Unit 22105-001, IFZA Business Park, DDP, Dubai, United Arab Emirates. The ADR provider may be contacted by email at disputes@egis-adr.com.


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