



SGD TECH N.V.

CompanyRegistrationNo.:169025

Responsible Gaming Policy

Company: SGD TECH N.V.

Registered Address: Trias Building, Hanchi Snoa 19, Willemstad, Curaçao

Platform: <https://kickwin.io>

Version	Description	Effective Date	Approved By	Review Date
1	Initial Responsible Gaming Policy	02/02/2026	Board of Directors	02/02/2026

This Policy is established in accordance with, and shall be interpreted in line with:
National Ordinance for Games of Chance (LOK, PB 2024 no. 157);
Requirements and guidance issued by the Curaçao Gaming Authority (CGA).

Approved by (Board of Directors):

Name:

Title: Director

Signature: _____

Date: 25-02-2026

Reviewed by (Compliance Officer):

Name: Ms. Eliane Solis Vazquez

Title: Compliance Officer

Signature: _____

Date: _____



Trias Building, Hanchi Snoa 19, Willemstad Curaçao



compliance@kickwin.io

1. Policy Statement

SDG TECH N.V. is committed to providing a safe, fair, and responsible gaming environment and to preventing gambling-related harm.

The Company recognizes that gambling should be a form of entertainment and not a source of financial, psychological, or social harm. This Responsible Gaming Policy sets out the principles, measures, and controls adopted by the Company to promote responsible gaming, protect players, and comply with applicable Curaçao laws and regulatory requirements.

2. Purpose

The purpose of this Policy is to:

- Promote responsible gambling behaviour among players;
- Prevent and mitigate the risks of problem gambling and gambling-related harm;
- Protect vulnerable persons, including minors and at-risk players;
- Ensure that players have access to responsible gaming tools and information;
- Comply with applicable legal and regulatory obligations under Curaçao law.

3. Legal and Regulatory Framework

This Policy is established in accordance with, and shall be interpreted in line with:

- National Ordinance for Games of Chance (LOK, PB 2024 no. 157);
- Requirements and guidance issued by the Curaçao Gaming Authority (CGA);
- Applicable consumer protection and player safeguarding standards.

4. Scope and Applicability

This Policy applies to:

- All players using the Company's gaming platform <https://kickwin.io>;
- All games, betting products, and services offered by the Company;
- All employees, contractors, and third parties involved in player interaction, customer support, or responsible gaming oversight.

5. Protection of Minors and Vulnerable Persons

The Company strictly prohibits access to its gaming services by minors.

Measures to prevent underage gambling include:

- Age verification during customer onboarding as part of KYC procedures;
- Refusal or termination of accounts where a player is identified as under the legal age;
- Suspension of services pending verification where age cannot be confirmed.

The Company also takes reasonable measures to identify and protect vulnerable players, including those who may exhibit signs of problem gambling.

6. Responsible Gaming Tools and Player Controls

The Company provides players with access to responsible gaming tools designed to help them manage their gambling activity, which may include:

- Deposit limits (daily, weekly, or monthly);
- Loss limits;
- Wagering limits;
- Session or time limits;
- Cooling-off periods;
- Self-exclusion options (temporary or permanent).

These tools are made available to players through their account settings or upon request to customer support.

7. Self-Exclusion and Cooling-Off

Players may request to self-exclude from the Platform for a defined period or permanently.

During a self-exclusion period:

- The player shall not be able to access their account or place bets;
- Marketing communications shall be suspended where applicable;
- The account shall remain restricted until the self-exclusion period expires or is lifted in accordance with applicable procedures.

Cooling-off periods allow players to take short breaks from gambling and are implemented upon request or where responsible gaming concerns are identified.

8. Identification of Problem Gambling Behaviour

The Company monitors player behaviour to identify indicators of potential problem gambling, which may include:

- Excessive or prolonged gambling sessions;
- Rapid increase in betting frequency or amounts;
- Repeated deposits within short periods;
- Chasing losses or erratic betting behaviour;
- Signs of distress communicated to customer support.

Where such indicators are identified, the Company may take appropriate action, including providing responsible gaming information, offering limits or exclusion tools, or restricting account activity.

9. Information, Awareness, and Player Education

The Company provides players with clear and accessible information relating to responsible gaming, including:

- Information about the risks associated with gambling;
- Guidance on setting limits and using responsible gaming tools;
- Access to external support organizations and resources for problem gambling.

Responsible gaming information is made available on the Platform and through customer support channels.

10. Advertising, Marketing, and Promotions

The Company ensures that its advertising and marketing activities are conducted in a responsible manner and do not:

- Target minors or vulnerable individuals;
- Promote gambling as a solution to financial problems;
- Misrepresent the chances of winning;
- Encourage excessive or irresponsible gambling behaviour.

11. Staff Training and Awareness

Employees involved in customer interaction, customer support, compliance, and operations receive appropriate training on responsible gaming principles, including:

- Identification of problem gambling indicators;
- Appropriate responses and escalation procedures;
- Use of responsible gaming tools and player protections.

12. Interaction with AML and KYC Measures

Responsible gaming measures operate alongside the Company's AML/CTF and KYC frameworks.

Information obtained through KYC, transaction monitoring, or player interaction may be used to support responsible gaming assessments, subject to applicable data protection requirements.

13. Complaints and Dispute Resolution

Players may raise complaints relating to responsible gaming matters through the Company's internal complaints process.

Where a complaint cannot be resolved internally, players may refer the matter to an independent Alternative Dispute Resolution (ADR) provider, in accordance with applicable regulatory requirements.

14. Record Keeping

The Company maintains records relating to responsible gaming measures, including self-exclusion requests, account restrictions, and related communications, in accordance with applicable record-keeping requirements.



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15. Governance, Oversight, and Responsibility

Senior Management is responsible for the effective implementation of this Responsible Gaming Policy.

The Board of Directors retains ultimate responsibility for responsible gaming compliance and formally approves this Policy and any material amendments.

16. Review and Update of the Policy

This Policy shall be reviewed at least annually, or sooner where required by changes in law, regulation, or the Company's business activities.



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17. Contact Information

For any questions or concerns relating to responsible gaming, players and stakeholders may contact:

Compliance Officer
SDG TECH N.V.
Trias Building, Hanchi Snoa 19
Willemstad, Curaçao

Attention: Ms. Eliane Solis Vazquez
Title: Compliance Officer
Email: compliance@ecorpp.com

Responsible gaming concerns may also be escalated to the Compliance Officer where appropriate.



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BOARD RESOLUTION

Approval of Responsible Gaming Policy

SDG TECH N.V.

(Incorporated in Curaçao)

Registered Address: Trias Building, Hanchi Snoa 19, Willemstad, Curaçao

RESOLUTION OF THE BOARD OF DIRECTORS

The undersigned, being the members of the Board of Directors of SGD TECH N.V. (the “Company”), hereby adopt the following resolutions:

1. Approval of Responsible Gaming Policy

RESOLVED THAT the Board of Directors has formally reviewed and approved the Company’s Responsible Gaming Policy, which sets out the principles, measures, and controls adopted by the Company to promote responsible gaming, protect players, and prevent gambling-related harm.

The Responsible Gaming Policy is adopted in accordance with applicable Curaçao laws and regulatory requirements, including:

- National Ordinance for Games of Chance (LOK, PB 2024 no. 157);
- Applicable requirements and guidance issued by the Curaçao Gaming Authority (CGA).

2. Implementation and Oversight

RESOLVED THAT Senior Management is hereby instructed to ensure the effective implementation of the Responsible Gaming Policy across the Company’s gaming operations and player-facing activities.

RESOLVED FURTHER THAT appropriate internal controls, player protection measures, and escalation procedures shall be maintained to support compliance with the Responsible Gaming Policy.



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3. Ultimate Responsibility

RESOLVED THAT the Board of Directors retains ultimate responsibility for responsible gaming compliance and shall review the Responsible Gaming Policy at least annually or upon material changes to applicable laws, regulatory requirements, or the Company's business activities.

4. Effective Date

RESOLVED THAT this Resolution shall take effect as of [DD / MM / YYYY]. 25-02-2026

By order of the Board of Directors

Name: _____

Title: Director

For and on behalf of SGD TECH N.V.



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