

Responsible Gaming Policy

Company: SDG TECH N.V.

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

Platform: <https://kickwin.io>

Version	Description	Effective date	Approved by	date
1	Initial RG	02/02/2026	Board of Directors	02/02/2026
1.1	Updated with CGA feedback	25/03/2026	Board of Directors	25/03/2026

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:

Ecorpp Management N.V.

Title: Director

Signature:



Date: 25/03/2026

Reviewed by (Compliance Officer):

Name: Ms. Eliane Solis Vazquez

Title: Compliance Officer

Signature:



Date: 25/03/2026

1. Policy Statement

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



SGD TECH N.V.

CompanyRegistrationNo.:169025

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.



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

5.1 ID Verification Procedure

The Company applies a multi-layered age verification process to ensure that all players are at least 18 years old, in line with regulatory requirements:

During registration, players must:

- Provide their date of birth;
- Confirm via declaration that they are over 18.

Prior to first withdrawal or risk thresholds:

- A government-issued identification document (passport, ID card, or driver's license) is required;
- Additional checks may include third-party verification, payment validation, and selfie verification

Accounts remain restricted until verification is completed.

If a minor is identified:

- Account is immediately closed;
- Deposits may be refunded in line with law.;

All verification records are retained and made available to the regulator upon request

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.

6.1 Reality Check Measures

Company may implement:

- Real-time session timer;
- Real-time clock;
- Pop-up reminders;
- Player-activated alerts showing duration and wins/losses.

7. Self-Exclusion and Cooling-Off

Cooling-Off

Players may activate cooling-off with:

- Minimum duration: 24 hours;
- Options: duration, brand, vertical, marketing opt-out (mandatory);
- Immediate enforcement.

Self-Exclusion

- Minimum duration: 1 year;
- Applies across all brands and verticals;
- Marketing automatically blocked;
- Fully online activation;
- Irreversible during selected period.

8. Identification of Problem Gambling Behaviour

The Company applies structured monitoring to identify potential problem gambling behaviour using key indicators including:

- Deposit and wagering frequency
- Repeated failed transactions due to insufficient funds

- Reversing withdrawals
- Extended or continuous play sessions
- Increased or distressed communication with support
- Frequent changes to responsible gaming tools
- Players reaching credit limits

Indicators are assessed collectively.

Where such indicators are identified:

- Player is flagged internally;
- Behaviour is reviewed;
- Risk level is assigned;
- Appropriate action is taken, including:
Communication with player;
Suggesting limits or tools;
Applying restrictions;
Account suspension or exclusion (if required).

8.1 Player Profiling and Risk Assessment

The Company establishes player profiles and applies a Risk-Based Approach

- Low Risk: standard monitoring;
- Medium Risk: enhanced monitoring;
- High Risk: intervention measures.

8.2 Monitoring and Intervention

Monitoring is conducted through:

- Automated systems;
- Manual review by trained staff.

Intervention measures include:

- Direct communication with players;
- Mandatory limits;
- Account suspension;
- Permanent exclusion.

The Company strictly ensures interventions are not used to delay withdrawals.

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.

9.1 Self-Assessment Tools

Players are provided with access to self-assessment tools to evaluate their gambling behavior.

These tools include:

- Gambling self-assessment questionnaires;
- Recognised screening tools;
- At least 6 months transaction history.

9.2 Internet Filtering Tools

The Company reminds players that, when sharing devices with minors, they should take appropriate precautions to prevent access to gambling services, including safeguarding usernames, passwords, and payment details.

Players are also encouraged to make use of third-party tools designed to restrict access to gambling websites, including:





- betblocker.org;
- gamban.com;
- gamblock.com

10. Advertising, Marketing, and Promotions

The Company does not engage in irresponsible advertising, including:

- No targeting of vulnerable persons;
- No portrayal of gambling as an investment;
- No misrepresentation of skill vs chance;
- No emotional manipulation;
- No depiction of minors;
- No explicit or inappropriate content;
- No association with harmful behaviours (e.g., drugs, alcohol);

All marketing:

- Includes responsible gaming messaging;
- Ensures transparency in promotions;
- Applies equally to third parties and affiliates.

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.

The Company records all Responsible Gaming interactions in the Player Account Management (PAM) system, including:

- Player communications;
- Identified risk indicators;
- Actions taken;
- Account restrictions applied.

Records are retained in accordance with regulatory requirements.

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.





SGD TECH N.V.

CompanyRegistrationNo.:169025

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.

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.



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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.

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].

By order of the Board of Directors

Name: _____

Title: Director

For and on behalf of SGD TECH N.V.



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