

Sculpture N.V.

Responsible Gaming Policy

This Responsible Gaming Policy has been prepared in strict adherence to the requirements and guidance issued by the Curacao Gaming Authority (CGA). The assessment is aligned with the principles outlined in the applicable anti-money laundering and counter-terrorist financing (AML/CTF) regulatory framework of Curacao and is intended to demonstrate the company's commitment to robust risk management and regulatory compliance. This document is addressed exclusively to the relevant regulatory authority and is submitted in strict confidence. It contains sensitive and proprietary information and must not be disclosed, reproduced, or distributed without the express written consent of the company.

Version Control

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1. Overview and Objective

This policy sets forth the commitment of Sculpture N.V. to maintaining a safe, transparent, and socially responsible gaming environment. It serves as a comprehensive statement of our Responsible Gaming Policy, which reflects our ongoing dedication to promoting healthy gambling behaviours, mitigating the risks of problem gambling, and ensuring full compliance with the legal and regulatory standards applicable under the jurisdiction of Curacao. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

This policy applies to all individuals and entities involved with our gaming operations, including but not limited to players, employees, partners, and service providers. It provides structured guidance on the implementation of key responsible gaming measures such as player protection protocols, voluntary self-exclusion programs, age and identity verification procedures, and ethical marketing practices. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Through the consistent application of these standards, Sculpture N.V. strives to foster a gaming environment that is not only entertaining and rewarding, but also conscious of player well-being and proactive in minimizing gambling related harm.

2. Underage Gambling Prevention

Sculpture N.V. is dedicated to preventing underage gambling and ensuring that only individuals aged 18 or older can access our platform. We have implemented strict age verification procedures to uphold this commitment and comply with applicable legal requirements.

Key Measures Implemented

- **Restricted Access:** Players cannot deposit funds or place bets until their age is confirmed to be 18 or older.
- **Registration Checks:** Age is verified during registration through Date of Birth, a required "I am over 18" confirmation, open-source checks, and validation of payment methods. If underage use is detected or suspected:
 - The account is suspended;
 - Deposits are refunded;
 - Winnings are forfeited;
 - The player is notified of all actions taken.
- **ID Verification:** Age checks are based on valid government-issued identification (passport, national ID, or driver's license). If doubt exists before full KYC/AML checks, immediate verification is required.

- **Additional Verification Tools:** Where needed, secondary methods such as proof of address, selfie ID checks, or third-party databases are used to verify age.
- **Record-Keeping:** All verification attempts and outcomes are documented and made available to regulators as needed.

3. Parental Control Tools

At Sculpture N.V., we uphold a strong commitment to preventing underage gambling and fostering a safe, responsible gaming environment for all users. We actively promote measures that help ensure our platform is used exclusively by adults who meet the legal age requirement.

We strongly encourage all parents, guardians, and adult users to take proactive steps when using shared devices in households where minors are present. This includes protecting and regularly updating login credentials, such as usernames and passwords, and ensuring payment information is securely stored or removed after each session. These precautions help prevent unauthorized access to gambling content by individuals under the legal age. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

As part of our responsible gaming support efforts, we also offer access to trusted third-party tools designed to help restrict or block access to gambling-related websites. These software solutions provide effective parental control features, allowing users to filter content, monitor usage, and restrict access based on specific criteria.

While many options are available globally, we recommend the following tools as reliable and widely used for content filtering and parental control:

- **Net Nanny** – www.netnanny.com: A comprehensive content-filtering solution with customizable parental controls.
- **GamBlock** – www.gamblock.com: Specifically designed to block access to gambling websites on multiple devices.
- **CyberSitter** – www.cybersitter.com: Provides content filtering and reporting tools ideal for parental oversight.

By combining personal responsibility, technological tools, and education, the Company aims to minimize the risk of underage access and uphold the highest standards of responsible gaming.

4. Self-Assessment of Gambling Behaviour

At Sculpture N.V., we are committed to promoting responsible gaming by giving players access to tools and information that encourage informed decision-making and self-awareness. An essential part of this commitment is helping individuals understand and reflect on their gambling habits.

To support this, players will have continuous access to a comprehensive history of their gaming activity, including detailed records of bets, wagers, wins, losses, and corresponding timestamps from the moment their account is activated. This transparency empowers users to monitor and manage their behaviour effectively.

We also promote the use of self-assessment tools as a proactive way for players to evaluate whether their gaming habits are healthy or potentially problematic. These tools are designed to foster self-reflection and early identification of risky patterns.

One widely recognized resource is the Gamblers Anonymous 20 Questions, a structured quiz that can help individuals assess whether their behaviour aligns with signs of problem gambling.

5. Monitoring and Analysis of Player Behaviour

At Sculpture N.V., we are committed to identifying and addressing signs of problematic gambling through the continuous monitoring of player behaviour. Our objective is to proactively detect early indicators of gambling-related harm and take timely, appropriate action to protect vulnerable individuals in accordance with Article 1.4(e) of the LOK, which prohibits the participation of such individuals in games of chance. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

We utilize a hybrid monitoring system that combines both human oversight and automated technological tools to ensure a well-rounded and effective approach. Our monitoring framework focuses on key behavioural indicators, including but not limited to:

- Deposit frequency and value trends.
- Betting patterns and irregular wagering activity.
- Session length and frequency of play.
- Player communication and support interactions.

Trained frontline personnel, including customer support representatives, are equipped to observe and identify behavioural red flags during direct engagements with players. In parallel, our platform is supported by advanced technological systems, including artificial intelligence and machine learning algorithms, which analyse player data in real time to detect anomalies and potential risk behaviours. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

To ensure a consistent response, a structured escalation and flagging process is embedded within our Responsible Gaming framework. When a player's behaviour triggers predefined risk criteria, a case review is initiated for further analysis. Based on the outcome, appropriate actions may be taken reaching from proactive communication, application of gambling limits, temporary suspension, or referral to professional support services. This expansion ensures

that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

This integrated system allows us to maintain a preventive and responsive responsible gaming environment, ensuring that player well-being is at the forefront of our operations.

5.1 Key Indicators

At Sculpture N.V., we carefully monitor a wide range of behavioural patterns to detect potential signs of problem gambling. By identifying these critical indicators early, we can intervene appropriately to protect our players and maintain a responsible gaming environment. Some of the primary behavioural signals we track include:

- Unusual Deposit and Betting Activity: Noticeable sudden increases in deposit amounts or wagering frequency, erratic spending habits, or inconsistent gameplay patterns that deviate from typical behaviour.
- Multiple Payment Methods: The use of various payment options.
- Repeated failed transactions due to insufficient funds.
- Repeated Withdrawal Cancellations: Frequent reversal or cancellation of withdrawal requests, which may indicate impulsive or conflicted gambling behaviour.
- Extended Play Sessions: Prolonged gaming periods without appropriate breaks, suggesting a loss of control or excessive engagement.
- Increased Customer Service Contact: High volume of interactions with support, especially if accompanied by repeated bonus requests, expressions of frustration, or complaints about account restrictions.
- Frequent Adjustments to Responsible Gaming Settings: Regular changes to deposit, loss, or session limits, or repeated use of cooling-off options, indicating potential struggles with self-regulation.
- Disproportionate Spending Relative to Financial Profile: Wagering patterns inconsistent with the player's known income, occupation, or demographic profile, suggesting financial overextension.
- Creation of Multiple Accounts: Efforts to circumvent deposit or loss restrictions by opening and using several player accounts.

Recognizing these behavioural signals enables Sculpture's personnel to take timely and targeted preventative actions, ensuring a safer and more responsible gaming environment for all participants.

5.2 Player Behaviour Identification and Intervention

At Sculpture, we follow a clear, structured approach to detect and address problem gambling. Our goal is to provide timely support and appropriate interventions for players showing signs of risk.

Risk Profiling: We continuously build and update comprehensive player profiles using behavioural data to assess risk levels. Automated alerts notify us immediately when potentially problematic activity is detected, enabling swift action.

Personalised Engagement: Trained responsible gaming staff reach out directly to players displaying concerning behaviours. All communications and interventions are carefully

documented in our Player Account Management system to ensure transparency and accountability.

Targeted Interventions: Players identified as high-risk are offered access to responsible gaming tools such as deposit limits, time-outs, and self-exclusion. We follow a graduated intervention process, ranging from setting limits and temporary account suspensions to permanent exclusion in severe cases, safeguarding players and promoting responsible gaming.

Under no circumstances will the Company use Responsible Gaming measures as a justification to delay or obstruct legitimate player withdrawals. Any misuse of responsible gaming interventions for purposes of financial gain will be regarded as a serious breach of licensing conditions.

5.3 Staff Training

The Company is committed to ensuring that all customer service representatives and responsible gaming personnel receive comprehensive, ongoing training to manage player interactions with professionalism, empathy, and effectiveness. This training equips staff to accurately identify early warning signs of gambling-related distress, including behavioural indicators such as agitation, irritability, aggression, signs of anxiety, or financial difficulties. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Employees are also trained in best practices for engaging with at-risk players in a sensitive and structured manner, emphasizing respect, confidentiality, and clear communication. Staff members are educated on how to appropriately direct players to available responsible gaming tools—such as deposit limits, time-outs, and self-exclusion options as well as to external professional support services and counselling resources. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Moreover, all player interactions, particularly those involving responsible gaming concerns, are meticulously recorded within the Company's systems. This documentation supports regulatory compliance, facilitates effective case management, and enables timely follow-up actions to ensure players receive the ongoing support they may require.

5.4 Escalation Process

Whenever problematic gambling behaviour is detected, it must be immediately escalated to the designated Compliance Officer for a detailed and thorough evaluation. The officer conducts an individualised review of each case, carefully considering the severity, frequency, and potential risks posed by the player's behaviour, as well as any contextual factors that may influence the situation. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Following this comprehensive assessment, the officer will determine the most appropriate course of action. This may include implementing enhanced account restrictions, such as tighter deposit or wager limits, initiating temporary account suspensions for further monitoring, or, in more serious or persistent cases, enforcing permanent exclusion to protect the player's welfare. Other responsible gaming interventions, including mandatory counselling referrals or enhanced player communication, may also be recommended based on the risk level. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

This structured escalation protocol ensures that every case is handled with due diligence and sensitivity, safeguarding player interests while upholding a secure and responsible gaming environment. All decisions and actions taken during the escalation process are meticulously documented, maintaining full transparency and compliance with internal governance frameworks as well as regulatory requirements. This documentation supports accountability and facilitates future reviews or audits. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

6. Cooling-Off Period

At Sculpture N.V., we are dedicated to providing players with a cooling-off period that is readily accessible, immediate, and entirely free from any form of interference or unnecessary barriers. We recognise the importance of allowing players to take a voluntary break from gambling activities whenever they feel the need, as part of our broader commitment to responsible gaming and player wellbeing. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Players must be able to initiate the cooling-off process quickly and effortlessly, without encountering any procedural delays, complicated requirements, or restrictive conditions. Our systems and customer support teams are designed to facilitate this process seamlessly, ensuring that once a player chooses to activate their cooling-off period, it begins promptly and without hesitation. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

During the cooling-off period, players will be temporarily suspended from accessing their accounts or participating in any gaming activities, giving them the necessary space to pause and reflect on their gambling habits. Our support staff remain available throughout this time to provide assistance, answer questions, and guide players towards additional responsible gaming resources and professional help if needed. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

We prioritise making these tools consistently available and easy to use, reinforcing our commitment to fostering a safe, responsible, and supportive gaming environment. Our approach ensures that players feel empowered to manage their gambling behaviour proactively, with full confidence that their decision to take a break will be respected and supported in every way. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

6.1 Cooling-Off Accessibility

We provide players with the option to initiate a cooling-off period tailored to their individual needs, offering flexible durations including:

- 24 hours;
- 7 days;
- 1 month;
- 3 months.

During the selected cooling-off period, players will be temporarily blocked from engaging in any gambling activities across the platform.

To ensure ease of use, the option to activate a cooling-off period is clearly visible and readily accessible on our website, allowing players to enable it instantly with a single click. This process is fully automated and does not require any email correspondence, manual approval, or intervention by our support team, ensuring a smooth and immediate experience. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Players also have the freedom to apply the cooling-off period selectively to one or more gaming categories offered on the platform, such as Slots, Table Games, Fixed Odds Betting games etc. This flexible approach empowers players to pause specific types of gambling activities or to take a break from all gaming products, giving them enhanced control over their gaming behaviour and supporting responsible play. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Activation and Restrictions

When a player chooses to activate the cooling-off period, it is essential that they receive clear and transparent information distinguishing this option from self-exclusion. Players should also be provided with the choice to immediately escalate to self-exclusion if they prefer a longer-term break from gambling.

The cooling-off period is activated instantly upon the player's selection, during which their account will be locked to prevent any gambling activity for the entire duration specified. This immediate enforcement ensures that players can confidently pause their play without delay.

Throughout the cooling-off period, players must be offered the opportunity to opt out of all marketing and promotional communications. This option allows players to fully disengage from the platform without exposure to offers or messages that might encourage them to resume gambling prematurely.

It is vital that the operator maintains a neutral stance regarding the player's decision to take a cooling-off period. Staff and systems must not:

- Question or challenge the player's choice.
- Attempt to delay or discourage the process through reassurances.
- Offer bonuses, incentives, or promotions aimed at persuading the player to continue gambling.

Player account during a cooling-off period:

- The player's account will remain active but all gambling features will be temporarily disabled.
- The player will not be able to place bets, deposit funds, or access any gaming products during the cooling-off period.
- All remaining account funds will remain accessible and available for withdrawal at any time.

At Sculpture, we uphold a firm commitment to respecting and supporting players' decisions to take breaks, providing them with effective tools and a safe environment to promote responsible gaming at all times.

Reactivation and Additional Time-Outs

At the end of the cooling-off period, player accounts are automatically reactivated, allowing players to resume gaming immediately without any additional steps or approvals needed from either the player or the operator. This ensures a smooth and hassle-free return to play. Should players wish to extend their break, additional time-out options remain available to provide further control over their gaming activity. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

7. Self-Exclusion

Sculpture N.V. is fully committed to safeguarding player well-being by providing a robust, transparent, and easily accessible self-exclusion program. This tool is designed to assist individuals who recognize the need to take a break from gambling, helping them regain control over their behaviour and reduce the risk of further gambling-related harm. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

When a player initiates a request for self-exclusion, the process is activated immediately and without delay, ensuring that access to all gambling services is promptly suspended. The

player's account is locked for the full duration of the selected exclusion period, during which they are unable to log in, deposit, or place wagers. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

All self-exclusion requests are formally documented in a dedicated Self-Exclusion Register, which is securely maintained for a minimum period of seven years following the end of the exclusion. This register serves as a reference point for monitoring and enforcing exclusions, as well as for compliance audits and regulatory reporting.

To strengthen the integrity of the exclusion, any payment methods or financial instruments linked to the self-excluded player's account will also be blocked. This precaution helps prevent circumvention of the restriction by using previously stored or associated cards and e-wallets, adding a vital layer of protection to support the player's decision. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

At Sculpture, we view self-exclusion not as a punitive measure, but as a proactive step toward player well-being. We ensure that all players are informed about this option, and we remain committed to treating each request with discretion, urgency, and professionalism.

7.1 Self-Exclusion Accessibility and Implementation

The Company ensure that the self-exclusion option is clearly visible and readily accessible across all areas of our platform. It is strategically positioned on our website to enable players to locate and initiate the self-exclusion process with minimal effort. We provide clear, user-friendly guidance explaining what self-exclusion entails, including step-by-step instructions, available duration options, and how this tool can help mitigate the risks associated with problem gambling. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Our aim is to empower individuals to take control of their gambling behaviour with confidence and clarity. We recognize that timely access to responsible gaming tools is essential, and we strive to make the process as transparent and supportive as possible.

7.2 Immediate and Seamless Self-Exclusion Process

Players can activate self-exclusion entirely online through an intuitive and secure interface. There is no need for email communication, telephone calls, or manual approval from our team to complete the process. The full procedure can be completed in under 15 minutes, offering a swift and seamless experience for those in need of a break from gambling. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Upon initiating self-exclusion, the player's account is instantly locked, and access to all gambling activities is suspended for the full term of the selected period.

To uphold the integrity of the self-exclusion, we employ advanced detection systems to identify and prevent the creation of duplicate accounts or any attempt to bypass restrictions by using alternate personal information or payment methods. Self-exclusion applies across all platforms operated by the Company ensuring that a player is fully restricted from access regardless of the site or service used. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Players are also encouraged to consider enrolling in self-exclusion programs from other gambling operators or national schemes, further supporting their commitment to responsible gaming and minimizing exposure to gambling triggers.

7.3 Self-Exclusion Durations and Associated Restrictions

We offer a comprehensive range of long-term self-exclusion options, enabling players to choose the timeframe that best aligns with their needs. Available durations include:

- 1 year;
- 3 years;
- 5 years;
- 10 years;
- Lifetime exclusion.

Once a player submits a self-exclusion request, it becomes effective immediately. During the exclusion period, the player will be entirely restricted from accessing their account, participating in any form of gambling, or receiving promotional materials.

The Company is committed to promoting responsible gaming and provides players with the option to self-exclude if they feel their gambling is becoming problematic. Once a self-exclusion is initiated, the following measures will be implemented:

- Brand Self-Exclusion: Applies to all brands and domains operated under the Company's licence.
- Vertical Coverage: Encompasses all forms of gambling activity offered by the Company.
- Marketing: The player will be automatically opted out of all marketing communications for the duration of the self-exclusion period.

We are fully committed to respecting and supporting every player's decision to self-exclude. At no point will our team attempt to persuade the player to reconsider, offer incentives to continue playing, or delay the self-exclusion process. Once enacted, self-exclusion cannot be reversed before the chosen period has expired.

7.4 Account Management During Full Self-Exclusion

Once a player activates a full self-exclusion across all product categories, the Company will take immediate action to enforce this restriction across the entire platform. All gambling-related activities, including deposits, wagers, and access to gaming content, will be completely blocked without delay. The player's account will be deactivated in full, preventing

further login, gameplay, or interaction with any gambling features. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Sculpture N.V. maintains strict responsible gaming practices. In line with Curacao regulations, the following measures apply to self-exclusion:

- Duplicate Accounts: The Company must have effective controls to detect, where reasonably possible, duplicate accounts and prevent self-excluded individuals from registering under alternate details.
- Civil Law Implications: Potential civil law consequences must be assessed. This may include voiding and refunding ante-post bets, subject to AML/CFT requirements.
- Ongoing Tournaments: Players engaged in tournaments (e.g., poker) at the time of self-exclusion must be allowed to complete them.
- Contribution to Progressive Jackpots: Contributions made before self-exclusion remain valid in the pool, but the player forfeits eligibility to participate or claim after exclusion takes effect.

Any available funds remaining in the player's account excluding those subject to Anti-Money Laundering (AML) restrictions or ongoing compliance checks will be processed for refund to the original payment method. This refund will occur within two business days, provided all regulatory and identity verification requirements have been satisfied.

To further support the player's decision to self-exclude, their contact information will be permanently removed from all marketing, advertising, and promotional distribution lists. This ensures the player will not receive any gambling-related communications via email, SMS, phone calls, or push notifications for the duration of the self-exclusion and beyond, unless and until they specifically request to re-subscribe following the end of the exclusion period (if applicable). This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

This comprehensive approach to account management is part of our commitment to maintaining a secure, respectful, and responsible gaming environment.

7.5 Marketing Communications Policy for Self-Excluded Individuals

The Company strictly prohibits any form of promotional outreach to players who have self-excluded. Throughout the exclusion period and thereafter unless the player formally opts back in the company will not send marketing messages, bonus offers, or invitations to participate in gaming activities. Communication will be limited exclusively to essential, non-promotional matters, such as legal notifications or regulatory obligations. No efforts will be made to encourage the player to return to gambling in any form. This expansion ensures that

Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

7.6 Compliance and Incident Handling Protocols

The Company maintains real-time, verifiable records of all self-exclusion actions to ensure complete transparency and accountability. These records are readily available for review by the Curacao Gaming Authority (CGA) upon request to demonstrate full regulatory compliance.

In the event that a self-excluded individual or a minor gains access to gambling services in breach of established controls, the company will respond without delay by:

- Issuing a refund of all deposited funds within two business days, excluding any amounts held in accordance with anti-money laundering (AML) procedures.
- Immediately locking the account to halt all gambling-related access and activity.
- Submitting a formal incident report to the CGA within five working days. This report will provide a detailed explanation of the breach.

These actions reflect the Company's strong commitment to regulatory compliance and responsible gambling.

7.7 Operator-Initiated Exclusion Procedures

The Company shall reserves the right to enforce a mandatory exclusion on a player when specific risk-based thresholds are met, particularly in cases where continued access to gambling services may lead to harm or regulatory breaches. Such exclusions are executed in line with our commitment to responsible gaming and player protection. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Operator-enforced exclusions may be applied under the following circumstances:

- Evidence of Harmful Gambling Behaviour: When a player demonstrates persistent patterns of excessive, compulsive, or erratic gambling activity, which may indicate a risk of addiction or self-harm.
- Engagement in Prohibited Conduct: If a player is suspected of or confirmed to have engaged in activities that are illegal, fraudulent, or violate the platform's terms of use, including but not limited to identity fraud, money laundering attempts, or collusion.

All operator-initiated exclusions are:

- Formally logged and tracked through our internal Responsible Gaming and Compliance systems.
- Accompanied by a detailed case report outlining the basis for the exclusion, the behavioural or compliance triggers involved, and any supporting evidence gathered during the review.
- Retained in secure storage for a minimum of five years, in accordance with regulatory obligations.

These records are made available to the Curacao Gaming Authority (CGA) upon request and serve as part of our audit trail to demonstrate due diligence, transparency, and strict adherence to responsible gambling protocols.

8. Player Limit Controls

As part of our commitment to responsible gambling and in accordance with regulatory expectations in Curacao, the Company empowers players to manage their gaming behaviour by setting customized deposit limits.

Players are given the option to impose daily, weekly, or monthly deposit thresholds to align with their personal financial preferences and gambling patterns. These limits are designed to promote self-control and reduce the risk of impulsive or harmful spending.

While players can tighten these limits at any time, making these changes will take immediate effect. However, requests to increase deposit limits will be subject to a mandatory waiting period, allowing players time to consider their decision carefully. This ensures that players are making thoughtful adjustments to their gambling behaviour.

This feature forms part of our wider Responsible Gaming framework, offering players practical tools to maintain control and encouraging safer engagement with our platform.

8.1 Deposit Limits

The Company provides players with the ability to set deposit limits across various time intervals, including:

- Daily;
- Weekly; and
- Monthly limits.

These controls enable players to manage and restrict the total amount they can deposit within each selected period, helping to promote responsible gambling. Once a player reaches their chosen deposit limit, further deposits will be blocked until the limit resets at the start of the next designated timeframe.

Players can reduce their deposit limits immediately, with changes taking effect without delay. However, any request to increase deposit limits will be subject to a seven-day cooling-off period before the new limit becomes active. This waiting period ensures players have ample time to reconsider any increase, supporting thoughtful decision-making regarding their gambling activity. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

Additional Limits

To further enhance responsible gaming measures, the Company may implement supplementary controls such as loss limits, session time limits, or wager limits. These additional tools provide players with more options to regulate their gambling behaviour effectively, reinforcing a safer and more controlled gaming environment.

8.2 Exceptions Summary

When limits or exclusions are applied during active gameplay or with outstanding bets such as during a poker tournament or pending event these restrictions take effect immediately but do not interrupt ongoing wagers or participation. Full enforcement of the limits or exclusions begins only after the current game, bet, or event has finished. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

9. Reality Check

Reality check tools are designed to help players maintain awareness and control over their gambling sessions by providing timely reminders and detailed feedback on their activity. These tools include the following features:

- A visible session timer that tracks and displays the length of the player's current logged-in session, ensuring players are constantly aware of how long they have been playing.
- Player-configurable reality check alerts that can be set to trigger at preferred intervals during gameplay. When an alert activates, the game temporarily pauses and displays a message requiring the player to acknowledge it before resuming. At this point, players are also offered the choice to either end the session or continue playing. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

These customized alert messages clearly present important information such as:

- The total duration of the current gaming session.
- A concise summary of the player's net wins or losses throughout that session.

By incorporating these detailed, real-time feedback mechanisms, reality checks encourage players to reflect on their gambling behaviour regularly and make more conscious, informed decisions about whether to continue or take a break.

10. Marketing

The Company is fully committed to ensuring that all marketing, promotional, and advertising activities strictly adhere to responsible gaming principles. During any active cooling-off or self-exclusion period, the company prohibits all forms of direct marketing targeted at the affected player. This includes emails, SMS messages, bonuses, free spins, or any other incentives designed to encourage gambling. This expansion ensures that Sculpture N.V. meets

the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

All advertising content must be truthful, transparent, and must not encourage excessive or irresponsible gambling behaviour. It is explicitly forbidden to target vulnerable groups, including minors or individuals known to be self-excluded or on cooling-off periods.

Furthermore, the Company holds its entire network of business partners accountable for compliance with these standards. This includes affiliates, social media influencers, VIP account managers, and third-party marketers. The company ensures that all these parties strictly follow responsible gaming policies and adhere to relevant regulatory advertising requirements to maintain integrity and player protection across all promotional channels. This expansion ensures that Sculpture N.V. meets the highest benchmarks for proactive compliance with Curacao's regulatory expectations and supports sustained player well-being.

10.1 Marketing Restrictions

Sculpture N.V. ensures all marketing follows strict responsible gaming standards by:

- Using clear, honest, and non-misleading advertising.
- Avoiding targeting vulnerable groups like self-excluded players, minors, or financially at-risk individuals.
- Never presenting gambling as a financial solution or investment.
- Not implying skill influences chance-based game outcomes.
- Avoiding emotional manipulation or portraying gambling as an escape.
- Excluding child-friendly content, minors, or influencers popular with minors from campaigns.
- Prohibiting sexual or explicit material and links to harmful behaviours (e.g., smoking, drugs, alcohol).
- Ensuring all promotions have transparent terms and do not encourage excessive gambling.

10.2 Responsible Marketing Commitments

The Company is dedicated to upholding responsible gambling principles across all advertising and promotional activities.

All advertisements will prominently display responsible gaming messages to reinforce safe gambling awareness. Offline advertising will comply fully with platform-specific responsible gambling codes and regulatory requirements set by the CGA.

For online and social media campaigns, strict guidelines will prevent targeting vulnerable groups. Direct marketing communications including emails, SMS, and push notifications will focus on promoting responsible gaming and exclude self-excluded players or those with imposed limits.

In sponsorship agreements, we commit to protecting vulnerable audiences, particularly minors, by preventing branding on youth sports equipment or at events aimed at children. All sponsorship materials will include responsible gambling messaging to promote safe gaming behaviours consistently.