

Responsible Gaming

Introduction

At Vanir Ventures B.V., ("Casino", "Company", "We", "Us", "Our"), we take the issue of responsible gaming seriously and we are dedicated to adopting a clear position on the subject. We want everyone who enjoys playing our games to be entertained and in control.

We encourage a socially responsible attitude to gaming within our industry, both with our licensees and within our own company, as we proactively seek to limit our customers' exposure to or prevent harms from any gaming-related issues, while providing our services, both fairly and legally.

We are committed to working with gambling regulators and jurisdictions to ensure that our products are delivered and tested in line with the expectations of the regulatory authority and that minors are prevented from accessing our services and other vulnerable people are not harmed or exploited by our products.

Whilst the majority of users will be unaffected by our products, we are aware, as a socially responsible gaming and platform provider, that we should take an active role in ensuring that we have taken all possible measures available to us to track, limit, and prevent gambling from being a source of harm to the small number of users that could or may develop gambling problems.

We employ a number of ways to guarantee that our products and services meet the expectations and standards laid out by regulators by implementing very clear policies, procedures, practices and training, in relation to problem gambling and responsible play. Our staff are subject to mandatory training on the subject and we employ the necessary tools and provide information about independent third-party help organizations that exist to prevent or address gambling harms that a minority of end-users may sometimes encounter.

As a responsible and fair gaming operator, there are a number of ways in which we can ensure we create a fair and safe environment in which our customers and users may enjoy our products and games responsibly. These include but are not limited to the following:

- Improving awareness and educating users and customers on responsible gaming practices;
- Prohibition mechanisms to prevent minors from accessing or utilizing our site as well as to protect minors and other vulnerable individuals;
- User protection and self-help tools;
- Proactive detection of problem gaming issues;
- Internal training and procedures;

- External training and working with industry self-help organizations;
- Reporting and regular audits.

Protecting the Vulnerable and Underage from Gambling

We do not seek the custom of underage users, the vulnerable, or those that are actively self-excluded. We actively seek to prevent them from gaining access to our products and services at the point of account registration.

For those individuals that have identified that they may require support to stop or control their gambling, we have a variety of tools available to limit or stop the play as well as links to professional organizations that may be able to assist them additionally.

We take the issue of underage gambling very seriously and in compliance with our licensing requirements, we employ all reasonable measures available to allow only those of the legal age (18 years +) to register a player account and wager real money.

As a socially responsible operator, we have effective policies, procedures, and tools in place to prevent underage gambling and furthermore, these tools are tested and audited to ensure compliance with and adherence to our licensing conditions and obligations.

In line with our licensing conditions, any marketing or advertising on our platform will not be targeted at minors and any will not include images of children or those who appear to be under the age of 25 years. Any marketing material and our platform including any terms and conditions will make it clear that underage gambling is illegal.

We only accept business/registrations in accordance with our licensing regulations. To uphold our strict adherence to gaming regulations and ensure that minors do not access our online products, an effective registration process has been adopted to record information pertaining to user registrations that captures name, address and date of birth. This data is then verified using an independent 3rd party KYC service provider.

An 18+ logo is prominently placed on the homepages of our website(s) that we operate and it remains visible always when on our site. Additionally, all of our websites contain a tick box allowing users to positively accept and confirm that they are of the legal age to enter and enjoy the website.

You can limit your access to certain Internet sites on your device according to the criteria you set yourself. Such site filtering can be used to protect children and other vulnerable people from accessing gambling sites. If your computer or device is also used by family members or friends who cannot register or play on our site because of their age, or who have self-blocked from

accessing gambling sites, or who are otherwise vulnerable to gambling problems, you should consider filtering Internet sites on your device. For example, the following sites are useful in this regard: * <<http://www.netnanny.com/>>

* <<http://www.contentwatch.com/>>

* <https://cybersitter.27labs.com/>

* <<http://www.betfilter.com/>>

* <<https://www.gamblock.com/>>

In the event that any underage activity is detected and confirmed by us, we have a policy to refund any transactions back to the nominated payment method that is associated with the player account. We record what details we have of the underage user in order to prevent further attempts to play by that person and we equally self-report the incident to the relevant authorities, as may be applicable.

Tools

Loss Limit

Our loss limit tool allows you to limit the amount of funds you can lose in a given period of time. The daily limit, for example, totals up all bets made during one calendar day and adds any winnings. Once the limit is reached, you cannot place any more bets until the limit resets.

The limit works like this:

- **Daily loss limit:** this limit totals all losing bets and all winning bets per day (00:00 - 23:59 CET).
- **Weekly loss limit:** this limit totals all losing bets and all winning bets for the current day and the last 6 days.
- **Monthly loss limit:** this limit totals all losing bets and all winning bets for the current day and the last 29 days.

You can update your game limits at any time. However, if you want to raise the game limits, then there is an automatic 48-hour delay. Lowering the game limits, on the other hand, is always possible immediately.

You can also request a deposit limit which restricts how much you can deposit into your player account. This can be set to a daily, weekly or monthly amount. Once you reach your selected deposit limit, you will not be able to deposit additional funds until the period to which the limit

applies, resets. Do note that there is a 24 hour delay/waiting period before any decrease to your deposit limit can take effect

If you want to set any these and/or other limits, please contact us anytime via Live Chat or email us at support@[insert].com and we will be happy to help.

Cooldown

Sometimes you might find yourself in a situation where playing becomes too much and a time out period or break is required. An easy and simple solution to this is that you need a little extra time and with a quick break you can cool off for a while. This option allows you to pause for 24 hours or 7 days or 1 month. You will not be able to use your account during this time and the account will be automatically opened after the end of the break period. In addition, you will be automatically removed from the marketing emails list until your period of cool down expires.

If you want to activate a cooling off period, please contact us anytime via Live Chat or email us at support@[insert].com and we will be happy to help.

Self Exclusion

Sometimes you need a longer break from gambling, whether you just want to limit your gambling for a longer period of time, or if gambling has already started to have an opposite effect to fun, thrills and excitement. If you feel that playing is affecting you negatively, we encourage you to take a longer break.

We offer the possibility of an access ban for the minimum period of 12 months. After this period has passed, your account will automatically reopen and you can log in and play again.

In addition to this, we also offer an indefinite account closure, which means that you can close your account even without automatic reopening. The account will remain closed until the player requests reopening by contacting our customer service via Live Chat or by email at support@[insert].com.

If you want to ban access to your account, contact our customer service via Live Chat or by email at support@[insert].com. Please note that the cancellation request sent by e-mail does not happen immediately, but we will confirm the cancellation to you by e-mail when it is done.

During the access ban, you cannot create a new account. Any attempt to create a new account while banned, violates our Terms of Use and may result in permanent suspension of your original account.

***Risk Profiling and risk assessment**

We continuously monitor and maintain risk profiles for our players, subject to certain conditions being met. This enables us to conduct risk assessments of players as well as ensuring that we abide by and maintain certain regulatory obligations we have as a responsible operator.

***In-play notifications

Subject to your period of play, you will receive on-screen notifications about your session times. This will provide you with a reminder of how long you have played for and allow you to consider taking breaks in between game sessions.

General Account Closures

Accounts held on our platform may be closed by you at any time for any reason. Any available funds that you are entitled to will be returned to the registered active payment method linked with your account, in accordance with our anti-money laundering policy and the site's general terms and conditions.

If you decide to close your account, you can do so by contacting our friendly customer service team via email at support@[insert].com.

We reserve the right to temporarily suspend or permanently close a user account at any time in accordance with our general terms and conditions, if it is found that the account has breached specific policies or events including but not limited to the following:

- Bonus abuse
- Fraud
- Suspicious transactions
- Collusion
- Money laundering
- Use of robots
- Underage usage
- Misuse or manipulation of any fault or error in our software

Self Help Organisations

We are committed to working within a socially responsible environment and have links to or collaborate with independent third parties that equally function within the jurisdiction(s) that we operate and hold our license(s) in.

Any website that we operate will have clear links and contact details for a number of self-organizations on its websites where users can find further information, help, and support for gambling-related problems.

There are many organizations that provide services to anyone who may be concerned with their gambling or wanting support and advice. We recommend that you contact one of the following professional organizations if you feel you require any help or guidance:[www.gamblersanonymous.org/ga](<http://www.gamblersanonymous.org/ga>) and [www.begambleaware.org](<http://www.begambleaware.org/>).

A proactive stance towards controlling play and spending should be included on all affiliated websites including the following approved questions depicting that gambling has become an issue rather than a pleasurable experience:

- Spending more money and time on gambling than you can afford
- Finding it hard to manage or stop your gambling
- Having arguments with family or friends about money and gambling
- Losing interest in usual activities or hobbies like going out with friends or spending time with family
- Always thinking or talking about gambling
- Lying about your gambling or hiding it from other people
- Chasing losses or gambling to get out of financial trouble
- Gambling until all of your money is gone
- Borrowing money, selling possessions, or not paying bills in order to pay for gambling
- Needing to gamble with larger amounts of money or for a longer time to get the same feeling of excitement or buzz

- Neglecting work, family, personal needs, or household responsibilities because of gambling
- Feeling anxious, worried, guilty, depressed, or irritable.

If you as a player relate to one or more of the above points, we urge you to take a break and contact your local helpline.

Staff Training

We are firmly committed to fostering a culture of compliance amongst all staff, key stakeholders, and affiliated operators/websites.

Staff training on core subjects such as responsible gaming is held annually, and training is incorporated into the company's induction program by a dedicated internal training manager.

The training and support program is designed as a continual process that is aimed at raising awareness levels of responsible gaming issues and providing industry updates related to regulatory initiatives and campaigns.

All Responsible Gaming training and policy guideline documentation is incorporated within our company handbook.