



CANARY ALLEY B.V.

RESPONSIBLE GAMBLING POLICY

Version:

Approved By:

Review Frequency:

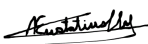
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2.0

Board of Directors

Annual or upon material regulatory change

09/06/2026

| Previous Version | Current Version | Edit Date  | Changes                                                                                                                                                                                                                                   | Editor | Signature                                                                                                                                                                                                                                                                                                                                                          |
|------------------|-----------------|------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|--------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| ---              | 1.0             | 10/07/2025 | First Version                                                                                                                                                                                                                             | MO     |                                                                                                                                                                                                                                                                                                                                                                    |
| 1.0              | 2.0             | 09/06/2026 | Second version – rewritten to comply with LOK 24th December 2024 - Official English Translation, Responsible Gaming Policy for Licensed Operators Version 1.0 17 April 2025, Policy Guideline Terms and Conditions Version 1.0 April 2026 | MO     | <div><div>Signed by:</div><div></div><div>8737E2B30CF043F</div></div> <div>Director:</div> <div><div>Signed by:</div><div></div><div>50C1AA43F7454ED...</div></div> <div>Director:</div> |
|                  |                 |            |                                                                                                                                                                                                                                           |        |                                                                                                                                                                                                                                                                                                                                                                    |



# 1. PURPOSE

The purpose of this Responsible Gaming Policy and Procedures Manual (“Policy”) is to establish the framework through which Canary Alley B.V. (“Company”) safeguards the responsible offering of Games of Chance and protects Vulnerable Persons.

This Policy has been adopted to:

- Promote gambling as a form of entertainment rather than a source of income;
- Prevent gambling-related harm;
- Protect Vulnerable Persons;
- Prevent underage gambling;
- Facilitate informed player decision-making;
- Provide tools that enable players to control their gambling activity;
- Establish procedures for identifying and assisting players displaying indicators of gambling-related harm;
- Ensure compliance with applicable legal and regulatory requirements.

The Company recognises that responsible gaming is a core licensing obligation and forms part of the Company’s overall customer protection framework.

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# 2. REGULATORY FRAMEWORK

This Policy has been developed having regard to:

- National Ordinance on Games of Chance (LOK);
- Curaçao Gaming Authority Responsible Gaming Policy for Licensed Operators;
- Curaçao Gaming Authority licence conditions;
- Curaçao Gaming Authority guidance and directives;
- Applicable Curaçao law;
- Industry best practice.

The Company shall maintain this Policy in a manner consistent with all applicable regulatory requirements.

Where any conflict exists between this Policy and applicable law or regulatory requirements, the latter shall prevail.



### 3. SCOPE

This Policy applies to:

- All gaming products operated by the Company;
- All websites operated by the Company;
- All player accounts;
- All customer-facing personnel;
- All marketing personnel;
- All compliance personnel;
- All third-party service providers involved in player interaction activities.

The requirements of this Policy apply equally to all brands operated under the Company's Curaçao licence.

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### 4. RESPONSIBLE GAMING PRINCIPLES

The Company shall apply the following principles throughout its operations.

#### 4.1 Player Protection

Protection of players shall take precedence over commercial considerations where there is evidence of gambling-related harm.

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#### 4.2 Prevention

The Company shall implement measures designed to prevent gambling-related harm before such harm occurs.

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#### 4.3 Early Intervention

The Company shall identify indicators of potential gambling-related harm and intervene where appropriate.

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#### 4.4 Transparency

Players shall be provided with clear information regarding:



- Risks associated with gambling;
  - Available Responsible Gaming tools;
  - Support organisations;
  - Self-exclusion options;
  - Deposit limit functionality.
- 

## 4.5 Accessibility

Responsible Gaming information shall be:

- Easy to locate;
  - Available from all websites;
  - Available through the customer account area;
  - Available in English and other relevant market languages.
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## 4.6 Continuous Improvement

The Company shall regularly review Responsible Gaming measures and implement enhancements where appropriate.

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# 5. DEFINITIONS

## 5.1 Responsible Gaming

Responsible Gaming refers to policies, procedures and controls designed to minimise gambling-related harm and promote informed gambling behaviour.

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## 5.2 Vulnerable Person

A Vulnerable Person includes any person who:

- Is under the age of 18 years;
  - Demonstrates insufficient control over gambling behaviour;
  - Has self-excluded or been excluded from gambling;
  - Is reasonably believed to be suffering gambling-related harm;
  - Meets any definition of Vulnerable Person under applicable law.
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## 5.3 Cooling-Off Period

A temporary player-initiated restriction during which gambling activity is prohibited for a specified period.

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## 5.4 Self-Exclusion

A player-initiated restriction preventing access to gambling services for a specified period.

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## 5.5 Operator-Initiated Exclusion

An exclusion imposed by the Company where evidence suggests a player may be a Vulnerable Person or may be suffering gambling-related harm.

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## 5.6 Responsible Gaming Interaction

Any communication initiated by the Company for the purpose of discussing gambling behaviour, player welfare or Responsible Gaming measures.

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# 6. GOVERNANCE

## 6.1 Board of Directors

The Board shall:

- Approve this Policy;
  - Review annual Responsible Gaming reports;
  - Ensure adequate resources are available;
  - Review significant Responsible Gaming incidents;
  - Oversee compliance with Responsible Gaming obligations.
- 

## 6.2 Compliance Officer

Until a dedicated Responsible Gaming Officer is appointed, the Compliance Officer shall fulfil the Responsible Gaming function.



The Compliance Officer shall be responsible for:

- Ownership of this Policy;
  - Responsible Gaming oversight;
  - Monitoring compliance;
  - Reviewing Responsible Gaming escalations;
  - Reviewing high-risk player cases;
  - Maintaining Responsible Gaming registers;
  - Conducting annual effectiveness reviews;
  - Reporting to Senior Management.
- 

## 6.3 Customer Support Team

Customer Support personnel shall:

- Promote Responsible Gaming tools;
  - Identify potential indicators of gambling harm;
  - Escalate concerns promptly;
  - Document Responsible Gaming interactions;
  - Support implementation of Responsible Gaming controls.
- 

## 6.4 Marketing Team

The Marketing Team shall:

- Comply with all Responsible Gaming advertising requirements;
  - Ensure exclusion lists are respected;
  - Avoid targeting Vulnerable Persons;
  - Include Responsible Gaming messaging where required.
- 

## 6.5 Senior Management

Senior Management shall:

- Support implementation of this Policy;
- Review Responsible Gaming reporting;
- Ensure operational controls remain effective;
- Implement improvements identified through monitoring.



## 7. RESPONSIBLE GAMING INFORMATION

The Company shall maintain a dedicated Responsible Gaming section on all websites.

The Responsible Gaming section shall include:

- Responsible Gaming information;
- Deposit limit functionality;
- Cooling-off functionality;
- Self-exclusion functionality;
- Support organisation information;
- Responsible Gaming contact details;
- Self-assessment tools.

The Responsible Gaming section shall be accessible from:

- Homepage;
  - Footer;
  - Account area;
  - Terms and Conditions.
- 

## 8. RESPONSIBLE GAMING CONTACT

Players may contact the Company regarding Responsible Gaming concerns through:

**Email:** [contactus@orbitexch.com](mailto:contactus@orbitexch.com)

The Company shall ensure Responsible Gaming enquiries receive priority handling.

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## 9. ANNUAL REVIEW

The Compliance Officer shall conduct an annual review of:

- Policy effectiveness;
- Player interaction outcomes;
- Self-exclusion statistics;
- Complaint trends;
- Responsible Gaming incidents;
- Regulatory developments.



A written report shall be prepared for Senior Management and the Board.

Any material changes to this Policy shall be documented and implemented following approval.

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## 10. PREVENTION OF UNDERAGE GAMBLING

### 10.1 Policy Objective

The Company shall take all reasonable measures to prevent minors from accessing or participating in Games of Chance.

No individual under the age of eighteen (18) years shall be permitted to register an account, deposit funds, place wagers or otherwise participate in any gaming activity offered by the Company.

Where the Company becomes aware that an account holder is a minor, immediate action shall be taken to suspend access and investigate the account.

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### 10.2 Registration Controls

The registration process shall require players to:

- Confirm they are at least eighteen years of age;
- Enter their date of birth;
- Confirm acceptance of the Terms and Conditions;
- Confirm acceptance of the Responsible Gaming Policy.

Players shall not be permitted to create an account without completing the required age declaration.

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### 10.3 Age Verification

The Company shall conduct age verification procedures in accordance with its AML/CFT Policy.

Verification measures may include:

- Government-issued identification;



- Passport verification;
- National identity card verification;
- Driver licence verification;
- Third-party verification services;
- Selfie and liveness checks.

Verification must be completed before the first withdrawal and earlier where risk indicators require it.

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## 10.4 Minor Accounts

Where an account holder is identified as a minor:

- The account shall be immediately suspended;
- All wagering activity shall cease;
- The Compliance Officer shall be notified;
- An investigation shall be conducted;
- Appropriate action shall be taken regarding deposits and winnings in accordance with applicable law.

The rationale for the decision shall be documented.

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# 11. VULNERABLE PERSON PROTECTION

## 11.1 General Principle

The Company shall take reasonable measures to prevent Vulnerable Persons from participating in gambling activities.

Protection of Vulnerable Persons forms a core component of the Company's Responsible Gaming obligations.

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## 11.2 Identification of Vulnerable Persons

A player may be identified as potentially vulnerable through:

- Behaviour monitoring;
- Customer interactions;
- Responsible Gaming requests;



- Self-exclusion requests;
- Third-party notifications;
- Customer Support observations;
- Compliance reviews.

The Company shall not rely solely upon player self-reporting.

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## 11.3 Indicators of Vulnerability

Indicators may include:

### Financial Indicators

- Significant increases in deposit frequency;
- Frequent failed deposits;
- Frequent deposit limit increases;
- Repeated requests to reverse withdrawals;
- Depositing immediately after losses.

### Behavioural Indicators

- Extended gambling sessions;
- Frequent gambling activity over prolonged periods;
- Apparent loss-chasing behaviour;
- Evidence of emotional distress;
- Aggressive or distressed communications.

### Responsible Gaming Indicators

- Multiple self-exclusion requests;
- Repeated cooling-off requests;
- Previous Responsible Gaming interventions;
- Requests for gambling-related assistance.

### Third-Party Indicators

- Family member concerns;
  - Regulatory notifications;
  - External support organisation referrals.
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## 12. PLAYER BEHAVIOUR MONITORING

### 12.1 Monitoring Framework

The Company shall maintain systems and procedures designed to identify indicators of gambling-related harm.

Monitoring shall be risk-based and proportionate to the nature, scale and complexity of the Company's operations.

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### 12.2 Monitoring Factors

Monitoring shall consider:

- Deposit frequency;
  - Deposit value;
  - Wagering volume;
  - Session duration;
  - Session frequency;
  - Withdrawal reversals;
  - Limit changes;
  - Account activity patterns;
  - Customer communications;
  - Previous interventions.
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### 12.3 Automated Monitoring

Where technological solutions are available, the Company shall utilise automated monitoring tools to identify potential indicators of gambling harm.

Automated monitoring shall support, but not replace, human judgement.

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### 12.4 Manual Monitoring

Customer-facing employees shall remain alert to indicators of gambling-related harm.

Manual observations shall be documented and escalated where appropriate.



## 13. PLAYER RISK ASSESSMENT

### 13.1 Risk Categories

Players may be categorised as:

#### Low Risk

No significant indicators of gambling-related harm.

#### Medium Risk

Limited indicators of gambling-related harm requiring monitoring and engagement.

#### High Risk

Multiple indicators suggesting a risk of gambling-related harm.

#### Critical Risk

Evidence indicating that immediate intervention may be required.

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### 13.2 Risk Assessment Reviews

Risk assessments shall be reviewed:

- Following significant behavioural changes;
  - Following Responsible Gaming interactions;
  - Following complaints relating to gambling behaviour;
  - Following self-exclusion requests;
  - Following Compliance Officer review.
- 

## 14. RESPONSIBLE GAMING INTERACTIONS

### 14.1 Purpose

Responsible Gaming interactions are intended to:

- Encourage informed decision-making;
- Promote use of Responsible Gaming tools;
- Identify gambling-related harm;
- Protect Vulnerable Persons.



## 14.2 Low-Risk Interactions

Examples include:

- Educational messaging;
  - Promotion of Responsible Gaming tools;
  - Deposit limit reminders;
  - Reality check reminders.
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## 14.3 Medium-Risk Interactions

Examples include:

- Direct communication from Customer Support;
  - Discussion regarding gambling behaviour;
  - Recommendations regarding deposit limits;
  - Recommendations regarding cooling-off periods.
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## 14.4 High-Risk Interactions

Examples include:

- Direct Compliance Officer review;
  - Mandatory Responsible Gaming discussions;
  - Temporary restrictions;
  - Enhanced monitoring.
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## 14.5 Documentation

All Responsible Gaming interactions shall be documented.

Records shall include:

- Date;
- Employee conducting interaction;
- Reason for interaction;
- Outcome;
- Any actions implemented.



## 15. ESCALATION PROCEDURES

Customer Support shall immediately escalate matters to the Compliance Officer where:

- A player expresses loss of control;
- A player requests help with gambling problems;
- There is evidence of financial distress;
- There is evidence of vulnerability;
- There is evidence of underage gambling;
- There is evidence of self-exclusion breaches.

The Compliance Officer shall determine whether additional action is required.

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## 16. INTERVENTION MATRIX

| Risk Level    | Action                                      |
|---------------|---------------------------------------------|
| Low Risk      | Monitor and educate                         |
| Medium Risk   | Contact player and recommend tools          |
| High Risk     | Formal intervention and enhanced monitoring |
| Critical Risk | Restriction, suspension or exclusion review |

The Compliance Officer may depart from the matrix where circumstances justify doing so.

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## 17. RESPONSIBLE GAMING INCIDENTS

A Responsible Gaming Incident includes:

- Underage gambling;
- Self-exclusion failures;
- Vulnerable Person participation;
- Significant intervention failures;
- Regulatory breaches relating to Responsible Gaming.

All incidents shall be documented and investigated.

The Compliance Officer shall determine whether regulatory reporting is required.



## 18. RESPONSIBLE GAMING TOOLS

### 18.1 General Principles

The Company shall provide players with a range of Responsible Gaming tools designed to assist players in managing their gambling activity.

Responsible Gaming tools shall:

- Be available free of charge;
- Be easily accessible;
- Be available through the player's account area;
- Be available without requiring Customer Support intervention wherever technically feasible;
- Be explained clearly to players.

The Company shall not discourage players from using Responsible Gaming tools.

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## 19. DEPOSIT LIMITS

### 19.1 Availability

The Company shall make deposit limit functionality available to all players.

Players shall be able to set:

- Daily deposit limits;
  - Weekly deposit limits;
  - Monthly deposit limits.
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### 19.2 Limit Reductions

Any reduction in a deposit limit shall take effect immediately.

The Company shall not delay the implementation of limit reductions.

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### 19.3 Limit Increases

Where a player requests an increase to an existing deposit limit:

- The request shall not take effect immediately;



- A mandatory cooling period shall apply;
- The increase shall only become effective after the expiry of the mandatory waiting period.

The Company shall maintain records of all limit increase requests.

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## 19.4 Removal of Limits

Requests to remove deposit limits shall be treated as requests to increase limits and shall be subject to the same waiting period.

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## 20. REALITY CHECKS

### 20.1 Objective

Reality checks are designed to assist players in maintaining awareness of:

- Time spent gambling;
  - Gambling frequency;
  - Gambling activity.
- 

### 20.2 Functionality

The Company shall provide reality check functionality where required by applicable regulation or operational risk assessment.

Reality checks may include:

- Session duration reminders;
  - Activity summaries;
  - Time elapsed notifications;
  - Deposit reminders.
- 

### 20.3 Player Acknowledgement

Where a reality check notification is displayed, the player shall be required to actively acknowledge the message before continuing play.



## 21. COOLING-OFF PERIODS

### 21.1 Purpose

Cooling-off periods are intended to provide players with a temporary break from gambling activity.

Cooling-off periods are distinct from self-exclusion and are generally intended for shorter periods.

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### 21.2 Cooling-Off Options

The Company shall make available cooling-off periods of:

- 24 Hours;
- 7 Days;
- 1 Month;
- 3 Months.

The Company may offer additional periods where operationally appropriate.

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### 21.3 Activation

Players shall be able to activate cooling-off periods through:

- Their account settings;
- Customer Support;
- Responsible Gaming contact channels.

Cooling-off requests shall be implemented immediately.

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### 21.4 Effects of Cooling-Off

During a cooling-off period:

- Gambling activity shall not be permitted;
- New deposits shall not be accepted;
- Promotional communications shall cease;
- Account access may be restricted.



## 21.5 Expiry

At the end of a cooling-off period:

- The account shall not automatically become active for gambling where further review is required;
  - The player may be required to confirm their intention to resume gambling activity.
- 

## 22. SELF-EXCLUSION

### 22.1 Purpose

Self-exclusion enables players to prevent themselves from accessing gambling services for a longer period.

Self-exclusion is intended for players who require a more significant intervention than a cooling-off period.

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### 22.2 Available Self-Exclusion Periods

The Company shall make available self-exclusion periods of:

- 1 Year;
  - 3 Years;
  - 5 Years;
  - 10 Years;
  - Permanent Self-Exclusion.
- 

### 22.3 Immediate Effect

Self-exclusion requests shall take effect immediately.

No delay shall apply to the implementation of a self-exclusion request.

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### 22.4 Consequences of Self-Exclusion

Upon activation of self-exclusion:

- Gambling activity shall cease;



- Deposits shall be blocked;
  - Marketing communications shall cease;
  - Promotional offers shall cease;
  - The account shall be restricted.
- 

## 22.5 Marketing Suppression

Self-excluded players shall be removed from:

- Email marketing lists;
- SMS marketing lists;
- Push notification campaigns;
- Affiliate remarketing campaigns where applicable.

The Company shall take reasonable steps to prevent marketing communications being sent to self-excluded players.

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## 22.6 Self-Exclusion Register

The Company shall maintain a Self-Exclusion Register.

The Register shall contain:

- Player details;
  - Date of exclusion;
  - Exclusion period;
  - Date of expiry;
  - Reactivation status.
- 

## 22.7 Expiry of Self-Exclusion

The Company shall not actively encourage a self-excluded player to recommence gambling activity following expiry of a self-exclusion period.

The player must initiate any request to reopen an account.

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## 22.8 Reactivation Procedure

Where a player requests reactivation following expiry of a self-exclusion period:



- A mandatory 24-hour cooling period shall apply;
- The player must positively confirm the request following expiry of the cooling period;
- The Company may conduct a Responsible Gaming review before reactivation.

The Company reserves the right to refuse reactivation where concerns remain regarding player welfare.

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## 23. OPERATOR-INITIATED RESTRICTIONS AND EXCLUSIONS

### 23.1 Authority

The Compliance Officer may impose Responsible Gaming restrictions where evidence suggests:

- Gambling-related harm;
- Vulnerability;
- Loss of control;
- Significant risk to player welfare.

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### 23.2 Available Measures

Measures may include:

- Responsible Gaming warnings;
- Mandatory interactions;
- Deposit restrictions;
- Temporary account restrictions;
- Temporary suspension;
- Operator-initiated exclusion.

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### 23.3 Immediate Action

Immediate restrictions may be imposed where:

- A player is believed to be a Vulnerable Person;
- A player indicates an inability to control gambling behaviour;



- Serious welfare concerns exist;
  - Regulatory obligations require intervention.
- 

## 23.4 Review Process

Operator-initiated exclusions shall be reviewed periodically by the Compliance Officer. All decisions shall be documented.

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# 24. RESPONSIBLE GAMING MARKETING CONTROLS

## 24.1 General Principles

The Company shall ensure that marketing activity supports responsible gambling and does not undermine player protection objectives.

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## 24.2 Prohibited Marketing Practices

The Company shall not:

- Target minors;
  - Target self-excluded players;
  - Target players known to be vulnerable;
  - Portray gambling as a solution to financial problems;
  - Portray gambling as a guaranteed source of income;
  - Suggest gambling can replace employment or financial planning.
- 

## 24.3 Responsible Gaming Messaging

Marketing materials shall include Responsible Gaming messaging where required by applicable regulation.

Responsible Gaming messaging shall be clear and visible.



## 24.4 Affiliates

Affiliate agreements shall require compliance with Responsible Gaming obligations.

Affiliates shall be prohibited from:

- Targeting minors;
- Targeting self-excluded players;
- Making misleading claims;
- Encouraging irresponsible gambling behaviour.

Affiliate breaches may result in termination.

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## 24.5 Social Media

The Company shall take reasonable steps to ensure Responsible Gaming principles are applied across:

- Social media;
  - Influencer campaigns;
  - Content marketing;
  - Digital advertising.
- 

# 25. SUPPORT ORGANISATIONS

The Responsible Gaming section shall provide information regarding support organisations including, where appropriate:

- GamCare;
- Gamblers Anonymous;
- Gambling Therapy;
- Local support organisations relevant to the target market.

Support organisation details shall be reviewed periodically to ensure accuracy.



## 26. RESPONSIBLE GAMING REGISTERS

### 26.1 General Requirement

The Company shall maintain Responsible Gaming records sufficient to demonstrate compliance with:

- The LOK;
- Curaçao Gaming Authority requirements;
- Internal policies and procedures;
- Applicable licence conditions.

All registers shall be maintained under the ownership of the Compliance Officer.

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## 27. RESPONSIBLE GAMING INTERACTION REGISTER

### 27.1 Purpose

The Responsible Gaming Interaction Register shall record all meaningful Responsible Gaming interactions with players.

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### 27.2 Minimum Contents

The register shall include:

- Date of interaction;
- Player username;
- Account number;
- Staff member conducting interaction;
- Reason for interaction;
- Risk category;
- Actions taken;
- Player response;
- Follow-up actions;
- Closure date.



## 27.3 Documentation Standards

All entries shall:

- Be objective;
  - Be factual;
  - Avoid speculation;
  - Be completed promptly after the interaction.
- 

# 28. RESPONSIBLE GAMING INCIDENT REGISTER

## 28.1 Purpose

The Incident Register shall record all Responsible Gaming incidents.

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## 28.2 Examples of Incidents

Incidents include:

- Underage gambling;
  - Self-exclusion failures;
  - Marketing to excluded players;
  - Vulnerable Person participation;
  - Failure of Responsible Gaming controls;
  - Regulatory breaches;
  - Significant intervention failures.
- 

## 28.3 Incident Investigation

All Responsible Gaming incidents shall be investigated.

Investigations shall include:

- Root cause analysis;
- Corrective actions;
- Assessment of regulatory impact;
- Determination of reporting obligations.



## 29. SELF-EXCLUSION REGISTER

The Company shall maintain a Self-Exclusion Register containing:

- Player identification details;
- Exclusion date;
- Exclusion duration;
- Expiry date;
- Marketing suppression confirmation;
- Reactivation decisions.

The Self-Exclusion Register shall be reviewed periodically by the Compliance Officer.

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## 30. RESPONSIBLE GAMING MANAGEMENT INFORMATION

### 30.1 Monthly Reporting

The Compliance Officer shall prepare Responsible Gaming management information on a periodic basis.

Reports shall include:

- Number of active players;
  - Number of interactions;
  - Number of medium-risk players;
  - Number of high-risk players;
  - Number of self-exclusions;
  - Number of cooling-off activations;
  - Number of operator exclusions;
  - Number of Responsible Gaming complaints;
  - Number of incidents.
- 

### 30.2 Trend Analysis

Management information shall identify:

- Emerging player behaviour trends;
- Changes in risk indicators;



- Effectiveness of interventions;
  - Areas requiring additional controls.
- 

## 31. KEY PERFORMANCE INDICATORS

The Company shall monitor Responsible Gaming performance indicators.

Examples include:

- Percentage of players using Responsible Gaming tools;
- Number of interventions completed;
- Self-exclusion volumes;
- Cooling-off utilisation;
- Complaint volumes;
- Intervention response times.

The Company may amend KPIs as operational requirements evolve.

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## 32. KEY RISK INDICATORS

The Compliance Officer shall monitor Responsible Gaming risk indicators including:

- Increasing self-exclusion rates;
- Increasing complaint volumes;
- Repeated intervention failures;
- Significant increases in high-risk player populations;
- Regulatory findings;
- Internal control failures.

Material adverse trends shall be escalated to Senior Management.

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## 33. STAFF TRAINING

### 33.1 General Requirement

The Company shall maintain a Responsible Gaming training programme.

Training shall be appropriate to the employee's role and responsibilities.



## 33.2 Induction Training

All employees whose roles may involve interaction with players shall receive Responsible Gaming training during onboarding.

Training shall cover:

- Responsible Gaming principles;
  - Vulnerable Persons;
  - Underage gambling prevention;
  - Responsible Gaming tools;
  - Escalation procedures;
  - Reporting obligations.
- 

## 33.3 Annual Refresher Training

Responsible Gaming refresher training shall be conducted at least annually.

Training materials shall be reviewed and updated periodically.

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## 33.4 Enhanced Training

Enhanced training shall be provided to:

- Customer Support personnel;
- Compliance personnel;
- Marketing personnel;
- Management personnel.

Enhanced training may include practical case studies and intervention exercises.

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## 33.5 Training Records

The Company shall retain records of:

- Training dates;
- Attendees;
- Training content;
- Assessment results where applicable.

Training records shall be retained for a minimum of five years.



## 34. INTERNAL AUDIT AND TESTING

### 34.1 Policy Testing

The Company shall periodically assess whether Responsible Gaming controls are operating effectively.

Testing may include:

- File reviews;
  - Register reviews;
  - Interaction reviews;
  - Website reviews;
  - Marketing reviews.
- 

### 34.2 Audit Findings

Any findings shall be documented.

Management shall implement corrective actions where deficiencies are identified.

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## 35. REGULATORY NOTIFICATIONS

The Compliance Officer shall assess whether Responsible Gaming incidents require notification to the Curaçao Gaming Authority.

Notifications shall be made in accordance with:

- Applicable laws;
  - Licence conditions;
  - Regulatory guidance.
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## 36. ANNUAL RESPONSIBLE GAMING REVIEW

The Compliance Officer shall prepare an annual Responsible Gaming Effectiveness Report.

The report shall assess:

- Policy effectiveness;



- Tool utilisation;
- Player interaction outcomes;
- Incident trends;
- Regulatory developments;
- Recommendations for improvement.

The report shall be presented to Senior Management and the Board.

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## 37. POLICY BREACHES

Employees who fail to comply with this Policy may be subject to:

- Additional training;
- Performance management;
- Disciplinary action;
- Escalation to Senior Management.

Material breaches shall be reported immediately to the Compliance Officer.

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## 38. RECORD RETENTION

Responsible Gaming records shall be retained for a minimum period of five years unless a longer retention period is required by:

- Law;
- Regulation;
- Litigation hold;
- Regulatory investigation.

Records include:

- Interaction records;
- Incident records;
- Self-exclusion records;
- Training records;
- Reports;
- Supporting documentation.



## 39. POLICY REVIEW

This Policy shall be reviewed:

- At least annually;
- Following regulatory change;
- Following material incidents;
- Following audit findings;
- Following significant changes to the business model.

All amendments shall be approved by the Board of Directors.

## APPENDIX A – RESPONSIBLE GAMING RISK MATRIX

| Risk Level | Description           | Typical Action                       |
|------------|-----------------------|--------------------------------------|
| Low        | No indicators of harm | Monitor                              |
| Medium     | Limited indicators    | Interaction and monitoring           |
| High       | Multiple indicators   | Formal intervention                  |
| Critical   | Significant concerns  | Restriction, suspension or exclusion |

## APPENDIX B – EXAMPLES OF INTERVENTION TRIGGERS

Examples include:

- Significant increase in deposits;
- Repeated limit increases;
- Repeated withdrawal reversals;
- Extended gambling sessions;
- Expressions of distress;
- Repeated cooling-off requests;
- Repeated self-exclusion requests.

Triggers do not automatically require exclusion but require review.



## APPENDIX C – SELF-ASSESSMENT TOOLS

The Responsible Gaming section shall include links to recognised self-assessment tools including:

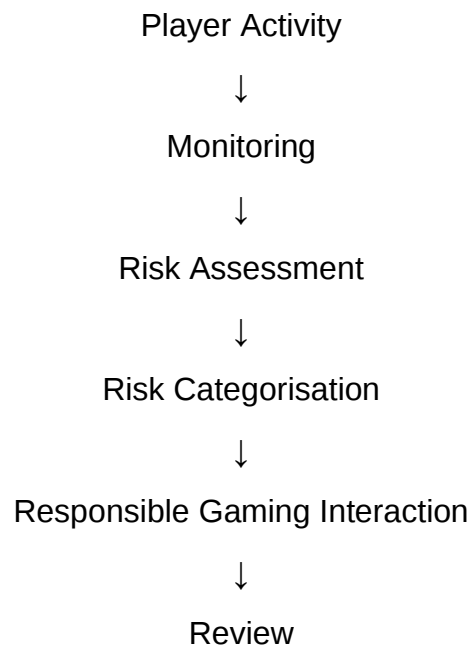
- Gamblers Anonymous 20 Questions;
  - CAGE Questionnaire;
  - Other recognised self-assessment resources.
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## APPENDIX D – SUPPORT ORGANISATIONS

The Responsible Gaming section shall contain details of support organisations including:

- GamCare;
  - Gambling Therapy;
  - Gamblers Anonymous;
  - Other relevant local organisations.
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## APPENDIX E – RESPONSIBLE GAMING WORKFLOW





Further Action Required?

No → Continue Monitoring

Yes → Restriction / Cooling-Off / Self-Exclusion / Operator Exclusion



Follow-Up Review



Case Closure



## APPENDIX:

# CANARY ALLEY B.V. RESPONSIBLE GAMING PUBLIC CONTENT

**Version:** 2.0

**Effective Date:** 09/06/2026

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## OUR COMMITMENT TO RESPONSIBLE GAMING

At Canary Alley B.V., we are committed to providing a safe, fair and responsible gaming environment.

We believe gambling should be an enjoyable form of entertainment and not a way to generate income or solve financial problems.

Most players gamble responsibly. However, for some individuals gambling can become problematic. For this reason, we provide a range of Responsible Gaming tools, information and support resources designed to help players maintain control of their gambling activities.

This Responsible Gaming Policy explains:

- How we promote responsible gambling;
  - The tools available to help you stay in control;
  - How we identify and assist players who may be at risk of gambling-related harm;
  - How to obtain help and support.
- 

## GAMBLING SHOULD BE ENTERTAINMENT

We encourage all players to:

- Gamble only for entertainment purposes;
- Gamble only with money they can afford to lose;
- Set personal limits before gambling;
- Avoid chasing losses;
- Take regular breaks;
- Monitor the time and money spent gambling;



- Seek support if gambling stops being enjoyable.

You should never regard gambling as:

- A source of income;
  - A way to recover financial losses;
  - A solution to financial difficulties;
  - An alternative to employment or investment.
- 

## UNDERAGE GAMBLING

Gambling is strictly prohibited for anyone under the age of 18.

We take underage gambling seriously and implement age verification measures designed to prevent minors from accessing our services.

During registration and throughout the customer lifecycle, we may require documentation to verify a player's age and identity.

If we discover that a player is under the age of 18:

- The account will be suspended or closed;
- Gambling activity will cease immediately;
- Additional action may be taken in accordance with applicable laws and regulations.

Parents and guardians are encouraged to supervise internet usage and consider using internet filtering software.

Examples include:

- Net Nanny
  - GamBlock
  - CyberPatrol
  - CyberSitter
- 

## PROTECTING VULNERABLE PLAYERS

We are committed to protecting players who may be vulnerable to gambling-related harm.



Our systems and personnel monitor for indicators that may suggest a player is experiencing difficulties controlling their gambling behaviour.

Where concerns arise, we may:

- Contact the player;
- Recommend Responsible Gaming tools;
- Suggest a cooling-off period;
- Recommend self-exclusion;
- Restrict gambling activity;
- Suspend or close an account where necessary.

Our objective is to help players remain in control of their gambling activities.

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## RESPONSIBLE GAMING TOOLS

We provide a range of tools designed to help players manage their gambling activity.

These tools are available free of charge.

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## DEPOSIT LIMITS

Players can set limits on the amount they deposit into their account.

Available limits may include:

- Daily limits;
- Weekly limits;
- Monthly limits.

Reductions to deposit limits take effect immediately.

Requests to increase or remove limits are subject to a mandatory waiting period before taking effect.

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## REALITY CHECKS

Reality Checks help players remain aware of the amount of time spent gambling.



Depending on the product and platform used, Reality Checks may provide:

- Session reminders;
- Activity summaries;
- Time elapsed notifications.

Players may be required to acknowledge these reminders before continuing play.

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## COOLING-OFF PERIODS

A Cooling-Off Period allows players to take a temporary break from gambling.

Available Cooling-Off Periods are:

- 24 Hours;
- 7 Days;
- 1 Month;
- 3 Months.

During a Cooling-Off Period:

- Gambling activity is blocked;
- Deposits cannot be made;
- Promotional communications are suspended.

Cooling-Off Periods take effect immediately.

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## SELF-EXCLUSION

Self-Exclusion allows players to prevent themselves from gambling for an extended period.

Available Self-Exclusion periods are:

- 1 Year;
- 3 Years;
- 5 Years;
- 10 Years;
- Permanent Self-Exclusion.

Self-Exclusion requests take effect immediately.



During Self-Exclusion:

- Gambling activity is blocked;
- Deposits cannot be made;
- Marketing communications cease;
- Promotional offers are withdrawn.

We strongly encourage any player who feels unable to control their gambling behaviour to consider self-exclusion.

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## ACCOUNT REACTIVATION

At the end of a self-exclusion period:

- We will not contact you encouraging you to return to gambling;
  - You must contact us if you wish to reactivate your account;
  - A mandatory 24-hour cooling period will apply before reactivation;
  - We may conduct additional Responsible Gaming reviews before allowing access to gambling services.
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## SELF-ASSESSMENT

If you are concerned about your gambling behaviour, we encourage you to complete a recognised self-assessment questionnaire.

Examples include:

### Gamblers Anonymous – Twenty Questions

Ask yourself:

- Have you ever gambled longer than intended?
- Have you ever borrowed money to gamble?
- Have you ever chased losses?
- Has gambling caused stress in your personal relationships?
- Have you ever felt guilty about gambling?

Answering “yes” to several questions may indicate that further support should be considered.

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## CAGE Gambling Questions

- Have you ever felt the need to Cut down gambling?
- Have people Annoyed you by criticising your gambling?
- Have you felt Guilty about gambling?
- Have you gambled as an Escape from problems?

These tools are not diagnostic but may help identify potential concerns.

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## SUPPORT ORGANISATIONS

If gambling is causing difficulties in your life, support is available.

The following organisations provide confidential assistance:

### GamCare

Website: <https://www.gamcare.org.uk>

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### Gambling Therapy

Website: <https://www.gamblingtherapy.org>

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### Gamblers Anonymous

Website: <https://www.gamblersanonymous.org.uk>

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Players should also consider local support organisations available within their country of residence.

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## RESPONSIBLE GAMING CONTACT

If you have concerns regarding your gambling behaviour or would like assistance using Responsible Gaming tools, please contact us:

**Email:** [contactus@orbitexch.com](mailto:contactus@orbitexch.com)

Responsible Gaming enquiries are prioritised and handled confidentially.



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## MARKETING AND ADVERTISING

Canary Alley B.V. is committed to responsible advertising.

We do not knowingly:

- Target minors;
- Target self-excluded players;
- Target vulnerable individuals;
- Present gambling as a financial solution;
- Present gambling as a guaranteed source of income.

We require our affiliates and marketing partners to comply with the same standards.

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## OUR RESPONSIBILITIES

We are committed to:

- Promoting responsible gambling;
  - Protecting vulnerable players;
  - Preventing underage gambling;
  - Providing responsible gambling tools;
  - Monitoring for indicators of gambling-related harm;
  - Training our employees in Responsible Gaming principles;
  - Continually improving our Responsible Gaming framework.
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## IMPORTANT REMINDER

Gambling should always remain a form of entertainment.

If you feel that gambling is no longer enjoyable, is causing stress, affecting your finances or impacting your relationships, we encourage you to seek support immediately and make use of the Responsible Gaming tools available.

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**Canary Alley B.V.**



Responsible Gaming Contact: [contactus@orbitexch.com](mailto:contactus@orbitexch.com)

Minimum Age: 18+

Applicable Law: Curaçao Law