

Responsible Gaming Policy

1. Purpose

This Responsible Gaming Policy ("the Policy") sets out the framework by which ABC Interactive N.V. ("the Company", "the operator") prevents underage and vulnerable persons from gambling, identifies and mitigates the risk of gambling-related harm, and intervenes promptly and proportionately when concerns arise.

2. Regulatory basis

This policy implements the responsible gaming requirements as per CGA Responsible Gaming Policy for Licensed Operators, including the prohibition in Article 1.4(e) on permitting a person who may reasonably be assumed to be vulnerable to participate in games of chance, and the self-exclusion duration requirements referenced in Clause 5.4(2) of the LOK.

3. Definitions

- "Vulnerable Person" — any player falling within the definition under Clause 1.1(h) of the LOK, including a person who is under 18, lacks sufficient control over their gambling behaviour, is subject to a compulsory or voluntary gambling ban, or has been declared bankrupt.
- "Cooling-Off Period" — a short-term restriction from gambling activity, available for 24 hours, 7 days, 1 month, or 3 months.
- "Self-Exclusion" — a long-term restriction from gambling activity, available for 1, 3, 5, or 10 years, or for life.
- "Reality Check" — an in-session notification informing the player of elapsed session time with win and loss during that period. It temporarily suspends play until the player acknowledges the message and chooses whether to continue or end the session..
- "Limits" — responsible gaming controls that restrict a player's gambling activity over a specified period, including daily, weekly or monthly deposit limits and, where applicable, loss, or bet limits; any reduction takes effect immediately, while an increase is subject to a seven-day waiting period.

4. Prevention of Underage Gambling

4.1 Age Verification

The Company does not permit persons under the age of 18 to register or gamble on its websites.

During registration, players must provide their date of birth and confirm that they are at least 18 years old. Registration will be rejected where the information provided indicates that the applicant is underage.

Documentary identity verification, which includes verification of the player's age, is conducted as part of the Company's KYC and AML procedures at the earliest of the following events:

- Before the player's first withdrawal
- When the player's deposits and/or withdrawals reach or exceed XCG 4,000, or
- At any earlier stage where a risk trigger, inconsistency or other red flag gives the Company reason to doubt the player's identity or age.

Verification must include a valid government-issued identity document, such as a passport, national identity card or driving licence. Where necessary, additional verification methods may be used, including proof of address, selfie or liveness verification, and reliable third-party database checks.

Where the Company suspects that a player may be underage, the account must be immediately restricted pending investigation and satisfactory age verification.

If a player is confirmed to be underage, the account must be closed immediately and the player must be clearly informed of the reason. The company must assess the legal implications, including whether deposits must be refunded and any winnings forfeited.

Records of all age-verification attempts and their outcomes are retained by the company.

4.2 Parental Responsibility and Internet Filtering

The Company's Responsible Gaming page provides parents and guardians with guidance on preventing underage gambling, including monitoring minors' internet use, securing account credentials and payment methods, logging out of unattended devices, and using appropriate parental-control or gambling-site blocking tools (e.g., Net Nanny, GamBlock).

5. Player information, account history and self-assessment

The Company maintains a distinct Responsible Gaming page that is clearly identifiable and accessible from the homepage.

The Responsible Gaming page:

- Explain the available responsible gaming tools and how they operate;
- Include Self-Assessment questionnaire
- Provide information to limits, cooling-off and self-exclusion;
- Explain how players may contact the Company about responsible gaming concerns; and
- Provide links to support organisations.

The Responsible Gaming section is referenced in the Terms and Conditions.

The website footer contains the required licence information, a visual indication that underage gambling is prohibited, a link to the Responsible Gaming section and a link to appropriate support resources.

5.1 Gambling history

Players have access to a record of their transaction and betting history, including timestamps

5.2 Self-assessment

The Company's Responsible Gaming page includes a self-assessment questionnaire designed to help players identify potential indicators of gambling-related harm.

Players who identify any concerns are directed to available responsible gaming tools, including limits, cooling-off and self-exclusion, and to independent support organisations.

5.3 Contact Procedures

Players may contact the Company regarding responsible gaming concerns at any time, through the following official channels:

- Email Support: support@imperialwins.com— available 24 hours a day, seven days a week.
- Live Chat Support: accessible through the interactive chat widget displayed in the bottom-right corner of the Website

Responsible gaming concerns received through these channels must be handled professionally and sensitively. Where further assessment or intervention is required, the matter must be promptly escalated to the Responsible Gaming Team.

All relevant interactions, concerns raised and actions taken must be documented in the Player Account.

6. Behavioural monitoring and risk assessment

6.1 Player Monitoring

The Company continuously monitors player activity to identify potential indicators of problem gambling and gambling-related harm. Monitoring is based on player profiles containing relevant data points, including deposit and betting activity, session duration, withdrawals, use of payment methods, responsible gaming tools and player interactions.

Monitoring factors include:

- Sudden, repeated or erratic changes in deposit, betting or session frequency;
- Multiple payment methods, particularly where used to bypass a limit or failed deposit;
- Repeated cancellation of withdrawal requests;
- Prolonged sessions or gambling without meaningful breaks;
- Increased support contact, repeated bonus requests, agitation, aggression or statements suggesting financial desperation;
- Frequent changes to responsible gaming tools, repeated attempts to increase limits or repeated use of cooling-off;
- Maxing out a credit card or attempting to register additional cards;
- Spending inconsistent with the player's known demographic or financial profile; and
- Multiple-account attempts intended to bypass limits or exclusions.

Cases of players exhibiting these behaviours will be escalated to the responsible gaming team, either through automated reports or by other employees who encounter this behaviour.

The presence of an indicator does not, by itself, establish gambling-related harm.

Each case must be assessed individually, considering the nature, severity, frequency, recency and escalation of the indicators, together with the player's profile, previous activity, communications, responsible gaming history and previous interactions and responsible gaming team will determine whether further restrictions, exclusions, or responsible gaming interventions are necessary.

6.2 Risk Assessment and Interaction

First-Line Review by Customer Support

Customer Support acts as the first line of identification and must:

- Recognise potential indicators of gambling-related harm during player interactions;
- Record the relevant behaviour, statements and circumstances in the Player Account;
- Immediately escalate identified concerns to the Responsible Gaming Team;
- Mark urgent cases clearly where the player indicates financial or emotional harm, distress or loss of control;
- Avoid offering bonuses, incentives or retention-related reassurance where gambling-related harm is suspected; and
- Apply any immediate protective restriction permitted under the relevant procedure while awaiting review.

Customer Support must not make the final risk assessment or decide whether an account should be excluded unless specifically authorised and trained to do so.

Responsible Gaming Risk Assessment

The Responsible Gaming Team reviews every case of potential gaming issues that they receive - either through the automated alerts or through manual escalations - and then determines the severity of the case.

The review must consider the player's profile, recent activity, previous interactions, responsible gaming measures, payment activity and any other relevant information.

Where the review identifies behaviour that reasonably suggests the player may be vulnerable or at risk of gambling-related harm, a direct contact with the player through an appropriate channel, such as email, telephone or live chat is initiated.

Players exhibiting at-risk behaviour must be informed about responsible gaming tools.

The Company applies a risk-based approach to determine the appropriate level of player monitoring and intervention. The level of action taken must reflect the nature, severity, frequency, recency and escalation of the indicators identified.

Risk level	Assessment factors	Actions
High	The player communicates financial, emotional or other harm; demonstrates loss of control	Immediately restrict or suspend the account where necessary; conduct an urgent direct interaction; or exclude the player in cases of extreme risk (operator-initiated exclusion). Compliance/RG escalation
Moderate	The player demonstrates multiple or repeated indicators, material increases in spending or gambling time, prolonged sessions, repeated withdrawal cancellations or concerning changes in behaviour.	Conduct a direct interaction; inform the player of responsible gaming tools including deposit limits, time-outs, and self-exclusion.
Low	An isolated or weak indicator is identified, and the review does not establish a material concern when considered against the player's overall profile.	Continue monitoring; provide responsible gaming information where appropriate; document the assessment and reasons for the decision.

All assessments, interactions, decisions and actions must be documented in the Player Account

Responsible Gaming Interventions

Depending on the assessed risk, the Company may:

- Continue or increase monitoring;
- Provide responsible gaming information;
- Apply or recommend deposit limits;
- Temporarily suspend the account pending further assessment; or
- Permanently exclude the player in cases of severe risk.

6.3 Staff training

The company conducts regular staff training in the relevant responsible gaming procedures.

Training covers:

- Recognising signs of gambling distress, agitation, aggression and financial desperation;
- Conducting sensitive and structured conversations;
- Directing players to responsible gaming tools and support resources;
- Escalating concerns promptly;
- Applying authorised interim protections; and

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- Documenting interactions, decisions and follow-up actions.

6.4 Record-Keeping

All responsible gaming alerts, assessments, interactions, decisions and interventions are recorded.

7. Responsible Gaming Tools

The Company provides players with tools to manage their gambling activity and reduce the risk of gambling-related harm.

Responsible gaming tools must:

- Be clearly displayed on the Responsible Gaming page;
- Be easy to understand and activate;
- Take effect within the required timeframe;
- Be available without unnecessary staff approval or delay; and
- Be recorded in the Player Account.

The Company and its employees must not question or discourage a player's decision to use a responsible gaming tool, delay its activation, or offer bonuses, incentives or reassurance to encourage continued gambling.

7.1 Self-Exclusion

A player has the option to exclude himself from accessing our site either directly from his account or by contacting customer support. The Company offers self-exclusion for one year, three years, five years, ten years and lifetime.

Self-exclusion takes effect immediately upon submission when completed online.

During this time, his account is blocked and he is not able to login into the account and gamble on our site.

Once self-exclusion is confirmed, it cannot be revoked by the player before the exclusion period ends. A player may request a longer exclusion period at any time. The extension takes effect immediately.

Records relating to a player's self-exclusion are maintained with the applicable retention periods.

For self-exclusion:

- The player's account is closed immediately and all gambling transactions blocked, and the player is not able to login
- Gambling occurring after the request, including outstanding bets, must be reviewed and may need to be voided and refunded, subject to AML/CFT requirements.
- The player must be permanently removed from marketing and promotional lists.

The Company maintains measures to detect duplicate accounts and prevent self-excluded individuals from re-registering

Operator-Initiated Exclusion

The Company may exclude a player as a high-risk intervention where the player displays problematic gambling behaviour, or attempts or engages in criminal activity on the platform. Operator-initiated exclusions are documented and retained for at least five years, and are available to the Authority on request.

7.2 Cooling off Periods (Time-out)

Cooling-off allows a player to temporarily restrict their gambling activity.

A player may activate the cooling off period through an automated process on the site or by contacting customer support.

Players may select a 24-hour, 7-day, 1-month, or 3-month cooling-off period.

The restriction takes effect immediately.

On expiry, the account is reactivated automatically, and the player may resume play without further action.

Players may opt out of marketing communications at any time through their account settings, including before activating a cooling-off period.

7.3 Limits

The Company offers players to set limits on their gambling activity.

Players may set the following daily, weekly or monthly limits:

- Deposit limits (amount of funds that can be deposited in a period of time). Once a limit is reached, no further deposits are permitted until the period resets.
- Bet limits (amount of funds that can be wagered in a period of time)
- Loss limits (amount of funds that can be lost in a period of time)

Changes to deposit limits are applied as follows:

- A request to increase the severity of a deposit limit take effect immediately; and
- A request to decrease the severity of a limit is subject to a 24h waiting period.

7.4 Reality Check

Players also have the option to set a reality check alert which shows at certain time intervals.

When a reality check is triggered, play must pause until the player confirms that the message has been read. The message must provide the option to end or continue the session and should clearly show the session duration and winnings and losses for the relevant period.

8. Marketing and Advertising

All marketing, promotions and advertising must support responsible gaming, be accurate and transparent, and must not mislead, encourage excessive gambling or target vulnerable persons. The company remains responsible for the conduct of its partners and representatives.

Prohibited content and targeting

- aggressive, excessive, deceptive or misleading tactics;
- targeting or appealing to minors, self-excluded persons, people with gambling problems or financially vulnerable persons;
- presenting gambling as an investment, a route to financial success or a solution to financial difficulty;
- misrepresenting the role of skill in games of chance;
- presenting gambling as an escape from stress, loneliness or personal difficulties;
- child-friendly cartoons, animations, imagery, celebrities, entertainers or influencers with material appeal to minors;
- featuring minors or depicting minors engaging with gambling content;
- explicit imagery or suggestion;
- associating gambling with smoking, drugs, alcohol, seduction or enhanced attractiveness; or
- unclear bonus conditions or promotions that encourage excessive play

9. Record-Keeping

The Company records all relevant responsible gaming activity for the periods specified in this Policy, or longer where required by applicable law, and made available to the Authority on request

Self-exclusion records must be retained for at least seven years after the exclusion period ends, or longer where required by law.

Operator-initiated exclusion records must be retained for at least five years.

All records must be available to the CGA upon request.