

LOTOSTORM B.V. 163910

RESPONSIBLE GAMING POLICY

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Approved by the Board of Directors

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1. Terminology and Key Definitions

Games of Chance

This term refers to activities where players stake real money or its equivalent with the intention of winning a reward of financial value. These games rely either entirely on randomness or on a blend of chance and minimal player input, without allowing players to meaningfully affect the result. Typical examples include poker and sports wagering.

LOK (National Ordinance on Games of Chance)

The principal piece of legislation governing the gambling sector in Curaçao. It sets out the legal standards and obligations for operators offering games of chance within the jurisdiction.

Marketing, Advertising & Promotional Activities

All forms of communication aimed at publicizing an operator's brand, products, or services. This includes—but is not limited to—digital marketing efforts, printed advertisements, social media promotions, and various other media formats designed to attract or retain players.

Mandatory Elements

These are essential features that must be incorporated into a Responsible Gaming program. They are designed to align with the operator's business model and target demographics to ensure compliance with regulatory expectations and the promotion of safe gambling behaviors.

Licensed Operator

An organization that holds a direct B2C gaming license issued by the Curaçao Gaming Control Board (GCB), or one that has been officially recognized with an Orange Digital Seal "Certificate of Operations," granting authorization to offer gambling services.

Self-Exclusion

A voluntary safeguard allowing individuals to opt out of gambling services—either partially or entirely—across all brands, websites, and platforms managed by the same licensed entity. This measure helps players limit their gambling activities when needed.

Vulnerable Individuals

As outlined in Article 1.1(h) of the LOK, this classification applies to any person who:

- Is under 18 years of age;

- Shows an inability to regulate their gambling behavior, with a potential or existing risk of addiction and harm to themselves or others;
- Has been legally or voluntarily barred from gambling;
- Has been declared insolvent or bankrupt.

2. Introduction to the Responsible Gaming Policy

LOTOSTORM B.V., a company established under the laws of Curaçao and operating under license number OGL/2024/303/0300 granted by the Curaçao Gaming Authority, is dedicated to upholding a gaming environment that is safe, transparent, and socially responsible. Our commitment is rooted in the principle that gambling should remain an enjoyable leisure activity—never a source of harm.

As part of our regulatory obligations and corporate responsibility, LOTOSTORM B.V.:

- Embeds Responsible Gaming standards throughout its operational processes and decision-making;
- Establishes a formal Responsible Gaming Policy that meets the requirements of the National Ordinance on Games of Chance (LOK);
- Publishes and updates this policy via the GCB Licensee Portal to ensure transparency and facilitate supervisory oversight;
- Continuously reviews and enhances its Responsible Gaming practices based on evolving player behaviors and market conditions.

This policy outlines our structured approach to responsible gambling, offering tools, safeguards, and support systems designed to empower players to stay in control of their gaming habits, while maintaining full compliance with applicable legislation and licensing terms.

3. Player Protection Measures and Regulatory Compliance

As a licensed operator under the authority of the Curaçao Gaming Control Board (GCB), LOTOSTORM B.V. adheres to a set of core Responsible Gaming obligations designed to protect players and maintain the integrity of its operations. The following safeguards are implemented as part of our licensing obligations under the National Ordinance on Games of Chance (LOK):

- **Age Verification** – Robust identity checks are in place to ensure all users meet the legal age requirement for participation in gambling activities.
- **Transparency of Information** – Responsible Gaming information is made easily accessible across all user-facing platforms, providing clear guidance and support.
- **Self-Evaluation Tools** – Players are offered optional assessments to evaluate their own gambling patterns and make informed decisions.
- **Monitoring of Player Behavior** – Player activity is monitored to detect early signs of risky or harmful behavior through behavioral analytics.
- **Cooling-Off and Self-Exclusion Options** – Players have access to temporary suspension or permanent self-exclusion features across all brands and platforms.
- **Deposit Control** – Users may define personal deposit limits to manage their financial engagement responsibly.

LOTOSTORM B.V. also ensures that all stakeholders involved in customer interaction and promotion are well-versed in responsible gaming principles. This includes:

- **Training & Awareness** – All staff, affiliates, social media influencers, and marketing partners receive training on Responsible Gaming practices.
- **Marketing Compliance** – All promotional material is reviewed to prevent targeting of minors, self-excluded individuals, or vulnerable groups.

To oversee the enforcement and effectiveness of these measures, a Responsible Gaming Officer (RGO) will be appointed. In the absence of the RGO, the Compliance Officer will assume interim responsibility.

Responsibilities of the RGO / Compliance Officer include:

- Conducting a comprehensive annual review of Responsible Gaming procedures and their impact.
- Submitting a performance report with analysis and recommendations to executive management.
- Promptly notifying the GCB of any policy modifications or updates.

LOTOSTORM B.V. is firmly committed to safeguarding player welfare and mitigating the risks associated with gambling. To uphold this commitment, we implement the following initiatives:

- A detailed Responsible Gaming Policy, outlining procedures and expectations across our operations;
- An array of supportive tools, such as limit-setting features, self-assessments, self-exclusion, and reality check, alongside player education materials;
- Proactive behavioral tracking systems to identify and act on potentially harmful gambling patterns;
- Full regulatory adherence, including audit participation, policy refinement, and transparent reporting.

Together, these actions form a comprehensive strategy that emphasizes player protection, responsible entertainment, and compliance with Curaçao's regulatory framework.

4. Access to Information and Support Services

At LOTOSTORM B.V., openness and ease of access are central to our Responsible Gaming approach. We are committed to equipping players with the knowledge, tools, and resources they need to make safe, informed decisions. By embedding these features directly into the user experience, we promote transparency, encourage responsible behavior, and support player autonomy.

Seamless Integration of Player Protection Resources

Responsible Gaming tools and educational content are fully integrated into our platform's design, ensuring they are visible and accessible throughout the player journey. Key components include:

- **Homepage Visibility**

A direct link to our Responsible Gaming Policy is clearly displayed on the homepage, making it easy for players to access the information they need without navigating away from key site areas.

- **Multilingual Availability**

To accommodate our diverse player base, the policy and related resources are available in English and may be translated into additional languages aligned with the demographics of our audience.

- **Instant Access to Control Features**

A range of self-management tools are available to all users, including:

- **Self-Exclusion Tools** to restrict account access for a selected time period;
- **Short-Term Cooling-Off Options** for temporary breaks;
- **Deposit Limits** allowing players to set personal financial boundaries.

Direct Player Support Channels

Support for responsible gambling inquiries is always within reach. Players can connect with our trained support team via live chat or email to request assistance, ask questions, or activate protective measures.

Integration with Platform Terms & Conditions

To meet regulatory obligations, our Responsible Gaming Policy is clearly referenced within the Terms and Conditions of the platform. This ensures:

- Full transparency regarding players' rights and available tools;
- One-click access to the Terms directly from the homepage;
- The ability for users to review responsible gaming measures at any time.

Footer Content Reinforcing Compliance

Important legal and regulatory information is consistently displayed in the website footer, including:

- A statement that access is restricted to individuals aged 18 or older;

- The official name, registered address, and company number of LOTOSTORM B.V.;
- Our gaming license number: OGL/2024/303/0300, issued by the Curaçao Gaming Authority on 14/01/2025;
- A declaration of supervision by the Curaçao Gaming Control Board;
- A direct link to our Responsible Gaming Policy;
- Display of the official Curaçao GCB digital seal to confirm licensed status and regulatory alignment.

External Gambling Support Services

Recognizing that responsible gambling goes beyond internal tools, LOTOSTORM B.V. also connects users to independent, professional support. We provide direct links to well-established organizations specializing in gambling addiction help, ensuring players have access to confidential, expert assistance when needed.

By offering continuous access to reliable information, practical tools, and external resources, LOTOSTORM B.V. affirms its dedication to player protection, ethical gaming, and full compliance with Curaçao's regulatory framework.

5. Age Verification Procedures and Access Restriction Tools

LOTOSTORM B.V. enforces a strict zero-tolerance policy regarding underage participation. In accordance with the National Ordinance on Games of Chance (LOK) and under the oversight of the Curaçao Gaming Authority, individuals under the age of 18 are strictly prohibited from registering, depositing, or engaging in any gambling activity on our platform. Immediate and decisive action is taken against any account suspected or confirmed to be operated by a minor.

Rigorous Multi-Step Age Verification Process

To ensure that only eligible adults access our services, LOTOSTORM B.V. has implemented a layered verification system, combining several checkpoints:

- **Declaration of Age at Sign-Up**
During the registration process, users are required to enter their date of birth and confirm they meet the legal age requirement of 18 years or older.

- **Submission of Official Identification**

Users may be prompted to upload a valid government-issued document (e.g., passport, national ID, or driver's license) to confirm their age and identity. This is obligatory at key Know Your Customer (KYC) and Anti-Money Laundering (AML) stages or earlier if there are signs of age discrepancies. However, if LOTOSTORM B.V. has any doubt of a player's age before the mentioned stages, ID Verification is to be requested earlier.

- **Verification Through Payment Methods**

As an added security measure, verification of the payment method (such as a credit/debit card or e-wallet) may be conducted to cross-check for potential inconsistencies and block underage transactions.

Protocol for Suspected or Confirmed Minor Access

If there is suspicion that a user may be underage, precautionary measures are triggered immediately, including account suspension pending verification. In confirmed cases:

- The account is permanently terminated.
- Any remaining balance is returned, subject to legal and AML review.
- All winnings are voided in compliance with applicable regulations.
- The user is notified with a clear explanation of the account closure.

Strengthened Identity Controls and Verification Enhancements

LOTOSTORM B.V. may deploy additional security measures if necessary, including:

- **Residential Address Confirmation**, such as utility bills or bank correspondence.
- **Live Photo ID Checks**, requiring the user to submit a selfie holding their identification document.
- **Third-Party Data Matching** using reliable databases to authenticate submitted details.
- **Early Age Validation**, conducted at any stage where age-related concerns are identified.

- **Detailed Logging** of all verification steps to support compliance audits and inspections.

Promoting Responsible Use at Home: Parental Controls

We believe that protecting minors is a shared responsibility. To further mitigate the risk of underage gambling, LOTOSTORM B.V. recommends that parents and guardians take proactive measures, such as:

- Restricting access to devices and stored payment methods.
- Implementing filtering or parental control software to block gambling content.

Recommended tools include:

- [Net Nanny](#)
- [GamBlock](#)
- [CyberSitter](#)

Continuous Commitment to Legal and Ethical Standards

LOTOSTORM B.V. is fully committed to protecting minors from exposure to gambling. Through strong age verification procedures, real-time detection systems, and support for safe browsing practices, we ensure our operations remain compliant, secure, and socially responsible—fully aligned with the regulatory framework of the Curaçao Gaming Authority.

6. Personal Risk Assessment

LOTOSTORM B.V. actively promotes self-awareness as a vital part of responsible gambling. We encourage all users to regularly reflect on their gaming behavior and ensure that their activity remains enjoyable and controlled. To support this, we provide a suite of tools that help players assess their habits and make informed, mindful decisions.

Review of Gambling and Transaction History

From the moment an account is created, players have access to a comprehensive log of their activity. This includes detailed records of wagers, outcomes, deposits,

and withdrawals—timestamped for accuracy. By reviewing their betting history, users can gain insight into their spending trends and spot any behaviors that may require attention.

Self-Assessment Questionnaires

LOTOSTORM B.V. offers interactive self-assessment tests based on well-established behavioral science principles. These questionnaires are designed to help users evaluate the nature and frequency of their gambling, identify early warning signs, and determine whether intervention may be needed.

If the results indicate that gambling is becoming problematic, players are encouraged to utilize the platform's Responsible Gaming features, including:

- **Setting deposit limits** to manage financial exposure
- **Activating self-exclusion** to restrict account access
- **Using cooling-off periods** for temporary breaks

In addition, we provide direct links to trusted third-party organizations that specialize in gambling-related support and mental health services, ensuring professional help is always within reach.

By equipping players with the tools to reflect on their behavior and offering accessible self-help resources, LOTOSTORM B.V. supports safe play while remaining fully aligned with the standards and expectations of the Curaçao Gaming Control Board (GCB).

7. Behavioural Analysis and Player Monitoring

LOTOSTORM B.V. employs a dynamic player monitoring system that blends advanced data analytics with human oversight to track user behavior in real time. This approach allows us to identify patterns that may signal an increased risk of gambling-related harm and respond promptly, in full compliance with Curaçao's regulatory obligations.

Detecting Signs of High-Risk Gambling Behaviour

Our monitoring infrastructure continuously evaluates a range of data points—including transactional trends, session activity, and platform engagement—to detect early indicators of problematic gambling. The following behavioral patterns may trigger internal alerts:

- Unusual spikes in deposit frequency or inconsistent wagering habits
- Efforts to circumvent spending controls by using multiple or alternative payment methods
- Repeated withdrawal cancellations, suggesting loss of control or impulsivity
- Extended play periods with limited or no breaks
- Frequent contact with support, especially in connection to bonus requests or emotional distress
- Recurrent changes to account limits or repeated use of cooling-off tools
- Elevated activity levels in risk-prone segments such as slots or live casino games, particularly among younger users under 25
- Unusual payment behaviors, including the use of several payment methods or reliance on credit-based funding
- Spending patterns that contradict the player's known financial capacity
- Attempts to create multiple accounts to override existing exclusions or limits

Behavioural Profiling and Ongoing Surveillance

Each user is assigned a behavioral profile that adapts over time based on gameplay history, transactional data, and overall interaction with the platform. When anomalous behavior is detected, our internal Responsible Gaming team is notified automatically for case review and assessment.

Responsive Action and Player-Centric Support

Should we identify conduct that indicates a risk of gambling harm, LOTOSTORM B.V. initiates a structured intervention process to reduce potential harm. This may include:

- **Direct Contact** from trained Responsible Gaming team members who approach the player with care and provide support
- **Adjustment of Account Limits**, such as reducing deposit thresholds or temporarily disabling access to high-risk products

- **Temporary Suspension of Play**, offering users a break to reflect and regain control
- **Permanent Exclusion**, imposed in situations where the user shows sustained signs of harmful gambling behavior

Empowering Staff to Respond Effectively

Our customer-facing employees—including support agents, VIP coordinators, and Responsible Gaming personnel—receive specialized training to recognize early warning signs and manage delicate conversations. Staff are trained to:

- Recognize behavioral and emotional red flags, such as agitation, erratic requests, or repeated complaints
- Communicate with empathy and reinforce the availability of support resources
- Promote and explain the use of tools like deposit limits, self-exclusion, and cooling-off periods
- Maintain detailed logs of interactions for transparency and compliance review

Escalation and Oversight for Critical Cases

If a user's conduct presents a significant concern, the case is escalated to the designated Responsible Gaming Officer or the Compliance Officer (excluding those handling AML responsibilities). Depending on the circumstances, further measures may include:

- Enforcing stricter account restrictions or full exclusion
- Recommending the user seek support through professional gambling help services
- Reporting the case to the Curaçao Gaming Authority when necessary, in line with regulatory reporting obligations

LOTOSTORM B.V. remains committed to proactive intervention, ethical player management, and regulatory compliance, ensuring player safety remains a top priority across our platform.

8. Temporary Play Suspension (Cooling-Off Period)

LOTOSTORM B.V. offers players a straightforward and immediate way to temporarily step away from gambling activities through our cooling-off feature. This self-initiated pause is designed to help users regain control of their play, reflect on their behavior, and encourage responsible gambling without facing unnecessary barriers or delays.

Access and Duration Options

Players can activate a cooling-off period directly from their account interface with a single click—no email requests or staff approval required. The feature is clearly presented on the platform and offers flexible timeframes to suit individual needs, including:

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

Cooling-off restrictions can apply either to specific game categories or across all gambling services, depending on the player's choice.

Activation Process and Immediate Enforcement

Once the cooling-off period is selected:

- The restriction is applied immediately, locking the account and suspending all gambling access for the full duration.
- Players are informed of the difference between a temporary cooling-off and a longer-term self-exclusion, with the option to switch to self-exclusion if needed.
- Users can choose to pause marketing communications to avoid receiving promotional messages during their break.

LOTOSTORM B.V. strictly prohibits any practices that may interfere with or discourage the use of the cooling-off feature. This includes:

- Attempting to persuade players to change their decision
- Introducing approval delays before activation
- Offering promotions, bonuses, or other incentives to continue playing

If the technical platform does not yet support full automation of this feature, LOTOSTORM B.V. will manually process all cooling-off requests without delay, ensuring player safety is never compromised.

Automatic Reactivation and Further Options

At the conclusion of the selected period, the account is automatically restored without requiring further action from the user. Should the player feel that a longer pause is necessary, they are encouraged to explore additional time-out tools or initiate a full self-exclusion for extended protection.

By making the cooling-off process simple, immediate, and fully user-driven, LOTOSTORM B.V. reinforces its dedication to safe gambling environments and remains in full compliance with the requirements set by the Curaçao Gaming Control Board (GCB).

9. Permanent Self-Exclusion Options

LOTOSTORM B.V. offers a robust self-exclusion system aimed at supporting individuals who wish to take extended breaks from gambling to regain control over their behavior. This protective tool is easily accessible, takes immediate effect upon request, and is enforced across all platforms operated by LOTOSTORM B.V.

Initiating Self-Exclusion: Process and Accessibility

Players can self-exclude through a clearly presented option available directly on the platform. This feature includes:

- A guided walkthrough of the self-exclusion process
- A list of available exclusion durations
- A description of how self-exclusion supports player well-being and promotes responsible gaming

Immediate Enforcement and Non-Reversible Effect

Once initiated, the self-exclusion is activated instantly and cannot be undone during the selected duration. As part of the enforcement process:

- The player's account is locked, restricting all gambling-related actions including deposits, wagers, and withdrawals
- Stored payment methods are blocked to prevent future use
- The player is registered in our Self-Exclusion Database, which is retained for a minimum of seven years post-exclusion
- Users are encouraged to extend their protection by excluding themselves from other gaming platforms as well
- LOTOSTORM B.V. utilizes detection systems to block any attempts to create duplicate accounts

Self-Exclusion Duration Options

As per Clause 5.4(2) of the National Ordinance on Games of Chance (LOK), users may select one of the following self-exclusion periods:

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime

During the exclusion period, no reversal is permitted. LOTOSTORM B.V. strictly prohibits any effort to deter players from choosing self-exclusion, including:

- Trying to change the player's mind
- Delaying the process with unnecessary interactions
- Offering bonuses or incentives to continue gambling

Players can apply self-exclusion to all products or limit it to specific categories, depending on personal preference.

Account Handling and Funds During Exclusion

If a player chooses to self-exclude from all services:

- Gambling transactions are instantly disabled
- The account is placed in an inactive state
- Any remaining balance, unless withheld for AML reasons, is refunded to the original payment method within two business days
- The player's contact details are removed from all marketing databases

For partial self-exclusion (by game type), access is restricted in accordance with the selected game categories.

Reinstating Access Post-Exclusion

When the self-exclusion period ends, the player must take the following steps to resume gaming:

- Submit a written request to reactivate the account
- Receive a reminder outlining Responsible Gaming resources
- Be encouraged to complete a self-check questionnaire, such as the Gamblers Anonymous 20-Question Test

The original account is reactivated under its existing credentials—creation of new accounts is not permitted for this purpose.

Restrictions on Marketing and Contact

During and after the exclusion period:

- No promotional offers, marketing messages, or gambling-related communications will be sent
- The player will not be contacted regarding gambling unless legally required, such as for account security matters

Unlike cooling-off periods which end automatically, self-exclusion requires the player to initiate reactivation manually after the exclusion period expires.

Regulatory Oversight and Documentation

LOTOSTORM B.V. logs all self-exclusion actions in real time. If a self-excluded player or underage individual is discovered using the platform:

- Their access is immediately terminated
- Any deposited funds are refunded within two business days (unless frozen under AML conditions)
- A report is filed with the Curaçao Gaming Authority (GCB) within five working days, including a full explanation of the incident and corrective actions taken

Operator-Initiated Exclusion

LOTOSTORM B.V. reserves the right to enforce exclusion without player request when:

- There is evidence of problematic gambling behavior
- The player shows signs of financial hardship linked to gambling
- The player is engaged in suspicious, fraudulent, or illegal activity

Such exclusions are formally documented and retained for at least five years. Records will be made available to the GCB upon request.

By offering a clear, secure, and user-controlled self-exclusion process, LOTOSTORM B.V. ensures responsible gambling practices while meeting the highest standards of regulatory compliance and player protection.

10. Financial Limits

LOTOSTORM B.V. provides players with effective budgeting tools to help manage their gambling activity responsibly. These financial controls are designed to promote self-regulation, prevent impulsive behavior, and support long-term player well-being.

Customizable Deposit Limit Settings

Players can set deposit limits directly from their account dashboard, choosing daily, weekly, or monthly caps based on their individual preferences. These self-imposed restrictions are central to maintaining responsible play and are structured with the following features:

- **Automated Enforcement**
Once a player's limit has been reached, no further deposits are permitted until the chosen time period resets.
- **Instant Decrease Option**
Players may reduce their deposit limits at any time, with changes taking effect immediately for maximum player protection.
- **Delayed Increases for Safety**
Requests to raise existing limits are subject to a mandatory seven-day waiting period, giving users ample time to reflect on the change before it is applied.

Special Cases: Ongoing Play Sessions

If a deposit limit is triggered during active gameplay, any ongoing gaming sessions are allowed to conclude naturally to preserve fairness. However:

- No new deposits will be accepted
- Additional wagers are blocked
- All new gaming activity is restricted until the time-based limit resets

This approach balances technical enforcement with a smooth user experience, ensuring that responsible gaming practices do not interfere with the integrity of outcomes.

Upholding Player Safety and Regulatory Expectations

LOTOSTORM B.V. is committed to player empowerment and transparency. Our financial control tools are designed to function clearly and without delay, supporting players in making conscious, informed decisions. These features are fundamental to our Responsible Gaming Policy and reflect our strict adherence to the Curaçao Gaming Authority's regulatory standards.

11. Game Time Awareness and Notifications

LOTOSTORM B.V. integrates real-time session monitoring tools to help players stay aware of their gaming activity and make responsible choices during play. This feature encourages mindful engagement and forms an important part of our commitment to safe and sustainable gambling practices.

Continuous Session Duration Display

While users are logged into their accounts, a persistent **session timer** is displayed, showing the total duration of their current gameplay session. This live tracker is:

- Visible at all times during gameplay
- Automatically updated in real-time
- Permanently enabled and cannot be turned off

The purpose of this feature is to increase transparency around playtime and give players a gentle prompt to pause, reflect, or consider using additional responsible gaming tools.

Reinforcing Responsible Gambling Habits

By embedding this session timer into the user interface, LOTOSTORM B.V. encourages players to remain aware of their time spent on the platform. This subtle tool promotes better decision-making by helping users recognize when it's appropriate to take breaks or reassess their activity.

As part of our wider player protection efforts, the session awareness tool supports LOTOSTORM B.V.'s compliance with the regulatory requirements outlined by the Curaçao Gaming Authority and underscores our dedication to providing a safe, informed gambling environment.

12. Marketing and Advertising Ethics

At LOTOSTORM B.V., our marketing approach is firmly grounded in integrity, transparency, and social responsibility. Every promotional effort is crafted to uphold our commitment to player protection, ensuring that advertisements never encourage harmful gambling behavior or exploit vulnerable audiences.

All campaigns—whether conducted directly or via third parties such as affiliates, influencers, or marketing partners—must adhere to a strict code of conduct aligned with our Responsible Gaming Policy.

Advertising Standards and Regulatory Compliance

To meet the advertising regulations established by the Curaçao Gaming Authority, LOTOSTORM B.V. applies the following principles to all promotional materials:

- **Honest and Clear Communication**
We ensure that all advertisements are fact-based, easy to understand, and free from misleading or aggressive language.
- **No Targeting of Vulnerable or Restricted Individuals**
Under no circumstances are marketing efforts aimed at minors, individuals who have self-excluded, or those demonstrating signs of gambling harm.
- **Avoidance of Financial Misrepresentation**
We do not suggest gambling as a solution to financial problems, a means of generating income, or a path to recovering losses.
- **Accuracy Regarding Game Mechanics**
Our promotions never portray games of chance as skill-based or imply that outcomes can be controlled by player tactics when they cannot.
- **No Emotional Exploitation**
Gambling is not marketed as a remedy for stress, anxiety, loneliness, or other psychological challenges.
- **Child-Safe Advertising Practices**
Visuals or messaging that could appeal to children—including cartoon imagery or youth-oriented themes—are strictly prohibited.
- **Influencer Integrity**
LOTOSTORM B.V. does not work with influencers or public figures whose

followings include significant underage audiences.

- **Appropriate Content Only**

We avoid using suggestive, offensive, or controversial content, including associations with excessive drinking, drug use, or other high-risk behaviors.

Bonus and Promotion Transparency

All promotional offers presented by LOTOSTORM B.V. are accompanied by clear, honest explanations. This includes:

- Straightforward terms and conditions
- No suggestions that bonuses can be used to recover losses
- Full disclosure of wagering requirements, restrictions, and eligibility

Responsible Gambling Messaging Across All Channels

Responsible gambling information is incorporated into every format and communication method, including:

- Visible disclaimers encouraging safe play on all advertisements
- Social media content clearly marked as gambling-related and restricted to users over 18
- Exclusion of self-excluded or restricted users from direct marketing (e.g., emails, SMS, push notifications)
- Offline promotions (such as branded merchandise or event sponsorship) fully aligned with responsible advertising policies and content guidelines

Affiliate and Influencer Compliance

LOTOSTORM B.V. holds all marketing partners accountable through:

- **Legally Binding Contracts**, requiring full compliance with our advertising code of conduct
- **Routine Audits**, ensuring ongoing adherence to ethical and regulatory standards

- **Enforcement Actions**, including immediate contract termination for violations

Influencers must:

- Confirm that their audience is primarily 18+
- Avoid any association with minors or high-risk individuals
- Promote gambling in a factual and responsible manner—never in a sensational, misleading, or provocative way

Sponsorship and Public Visibility Standards

We take additional care in all public-facing brand placements by enforcing the following rules:

- Our branding does not appear in venues, merchandise, or media aimed at minors
- We avoid visibility at events with high youth attendance
- Sponsored messages include responsible gambling disclaimers and emphasize moderation

Maintaining Integrity in Marketing

LOTOSTORM B.V. ensures that every aspect of our promotional efforts aligns with ethical advertising principles and regulatory best practices. Through clear communication, careful partner selection, and continuous oversight, we uphold a marketing environment that protects players and reinforces our dedication to responsible gaming.

