

LUDERE B.V.

RESPONSIBLE GAMBLING POLICY AND PROCEDURES

This document sets out the Company's obligations of the Responsible Gambling Department describing the main concepts, tasks and responsibilities of Responsible Gambling.

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1. Introduction

LUDERE B.V. (hereinafter, “the Company”) is committed to Responsible Gambling (‘RG’), and our main objectives are to protect minors and the many different types of recognised vulnerable groups from negative issues that can sometimes be associated with gambling.

The Responsible Gambling policy outlines the Company’s values and principles in promoting safe and sustainable gaming practices. It defines the actions the Company undertakes to uphold the high standards of player protection and social responsibility with regulatory commitments.

The Responsible Gambling policy is in place to reinforce the clear intent, realistic evaluation and actionable processes that the Company follows.

1.1 Core Values

The Company is committed to player protection and the prevention of excessive gambling. We strive to provide a high level of player protection, promote responsible gambling, and inform our players of the options available for them to maintain their gambling as a form of entertainment within their control. Responsible Gambling is a core pillar in our operation and we understand the impact gambling addiction can have on not just the affected individual but also friends, family, and colleagues, as well as on a larger scale to society as a whole.

Gambling addiction can lead to severe consequences; it is therefore significant that gambling operators fulfill their responsibilities by adhering to all applicable regulations and implementing best practices to mitigate risks.

2. No Provisions of Credit

In line with our license obligations, and in order to prevent players from gambling outside of their means, the provision of credit, whether directly or indirectly, is strictly prohibited under this policy. The Company does not provide any players with credit, via our site or by other means, and does not allow for any peer-to-peer transfers of funds between player accounts.

3. Protection of vulnerable players

Whilst a majority of players are able to enjoy gambling within the limits of their control, there are groups of individuals that can be considered vulnerable, and it is the responsibility of the Company to protect the vulnerable and reduce the risks connected to gambling. Precisely, vulnerable players are considered (but not only limited to):

- Individuals under eighteen years of age;

- Individuals who have no (or insufficient) control over their gambling behaviour, or where they are under threat of becoming addicted to one or more Games of Chance and as a result may cause harm to themselves or other people;
- Individuals who have been banned from playing any Game of Chance either by force or at their own request;
- Any individual that has been declared bankrupt.

4. Prevention of underage gambling

According to Article 1.4 (d) of the LOK it is prohibited for the gambling license holder to allow a minor the opportunity to participate in games of chance.

The Company does not allow individuals under the age of 18 to register an account. Upon registration, the player is required to enter their date of birth and confirm that they are over 18. Furthermore, the Company, through regular monitoring from the responsible officers, prevents minors from accessing gambling services, while simultaneously ensuring that marketing materials are not targeted toward or appealing to underage individuals.

5. Socially Responsible Marketing

We aim for a high standard in our marketing initiatives and comply with current legislation on marketing and further requirements set out in the jurisdictions we operate in.

We always formulate our marketing with fairness and transparency in mind and make sure to avoid any misleading or aggressive marketing.

Wherever possible, we make sure to utilize available means to “age-gate”; to limit the audience and avoid marketing material being seen by minors or younger individuals.

A filter is applied to ensure that self-excluded individuals, individuals identified as high-risk within the system, and players who have unsubscribed from marketing communications do not receive any news.

6. Training and Staff Readiness

All operational staff are made aware of the Company’s obligations under RG and the risks the Company faces in relation to this. More particularly, Customer Support service and Responsible Gaming Staff receive regular training adapted according to the role and responsibility of each individual which also includes training as to how to handle player interactions with professionalism and care. They are also equipped to identify signs of gambling-related distress and to refer players to the appropriate support services.

7. Player protection

Gambling Problems (or Problem Gambling) is a term often used generally to include all levels of gambling-related problems, from risk-taking gambling behavior with very few negative consequences to gambling addiction with serious consequences. For this reason, it is essential that players are provided with clearly identified, defined and easily accessible options to manage their gambling activity.

7.1 Mandatory Responsible Gambling Limits

The Company, following the guidelines as these are clearly set within the Responsible Gaming Policy for Licensed Operators, Version 1.0, 17th of April 2025 issued by the Curacao Gaming Authority, provides the below mechanisms to the players directly available through their websites in assisting them to monitor and control their gambling behavior:

Deposit Limits:

- Allows the players to limit the amount of money they can deposit on a daily, weekly or monthly basis.
- Once a deposit limit is reached, players will not be able to deposit additional funds until the specified period resets.
- If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.
- Any resolved or unresolved wages made prior to the deposit limit being set in place remains unaffected regardless of the limits set.

Self-exclusion:

- Players can request to self-exclude from participating in gambling on our site for a definite or indefinite period. A self - exclusion is a long-term, irrevocable exclusion from all gambling activities.
- Players can request a self exclusion for a period of minimum of 1 year, to 3 years, 5 years, 10 years or indefinite.
- Deposits are not allowed.
- Players will no longer be able to log in to their accounts.
- Players will not be receiving any marketing messages during the self - exclusion period.
- Upon receiving a self exclusion request from a player, the Company will automatically exclude the individual from all brands and domains operating under its license.
- After the self-exclusion period ends, players must request in writing (by email or chat) the unblocking of their account.

Cool-off:

- Players can request a short - term temporary restriction from all gambling activities, which the player can customize. A cool - off is a short term, temporary restriction from gambling activities.
- Cool-off restriction can be set for a period of minimum of 24 hours, to 7 days, to 1 month or to 3 months maximum.
- Deposits are allowed.
- Players can log in to their account.
- Player funds remain available for withdrawal.
- Players have the choice to opt out from receiving marketing materials. Any restrictions imposed by the players, either in regards to cooling off or self exclusion, shall take effect immediately and be enforced according to the player's selections.
- Players' accounts will be automatically reactivated after the selected Cooling - off period expires.
- When the player requests a cool-off, the player has the option to be excluded either from the current brand or from and/or all selected brands.

Players' requests for self-exclusion and/or cool-off periods will be actioned as promptly as possible, and no later than 24 hours from the time the request was received.

7.2 Other Limits

Furthermore, the Company has the discretionary power to evaluate each player and their behaviour on a case by case basis and accordingly offer additional options in the limits offered, in order to better facilitate and protect their game play and/or gambling activity.

- Bet/Wager Limits: allows the players to limit the amount of money they can bet on a daily, weekly or monthly basis.
- Loss limit: allows the players to limit the amount of money they can lose on a daily, weekly, or monthly basis.
- Reality Check: During a game session, the player will receive a notification reminding the time logged into their account, including a summary of the bets, wins and losses.
- Time session limit: During a game session, the player will be automatically logged out and will receive a notification reminding the time logged into their account, a summary of the bets, wins and losses.

8. Account Review

According to a player's behavior, customer service may further escalate a player's account to the Responsible Gambling Team, under which it will be carefully reviewed for signs of problematic gambling in order to understand the player's profile and the risk level in the account and decide if any further actions need to be taken.

Review process

The Review process is based on a checklist for certain signs to analyze account activity and evaluate the risk level of a player.

Signs of risk and vulnerability:

- Displays of agitation/ distress.
- Intimidation/ aggression.
- Mentioning negative effects of gambling, regrets over gambling, and upset over losses.
- Blaming the casino for losses.
- Frequent complaints, for example, complaints about not winning or games being rigged.
- Pushing to have a withdrawal paid immediately.
- Multiple bonus requests, especially following losses.
- Several contacts at night for complaints or bonuses.
- Gameplay during odd hours, for example, at night or during working hours.
- A significant change in gameplay pattern, especially an increase in deposit/betting pattern.
- Previous self-exclusions or cool-offs.
- Frequently cancelled withdrawals.
- Poor health condition, or behavior-altering medication, such as Parkinson's medication.
- Disclosure of financial difficulties or loss of income.
- Life-changing experiences such as loss, death in the family, a breakup, illness, loss of job, or bereavement.
- High-pressure/stressful situations, such as a high-pressure type of job.
- High appetite for risk-taking.
- Difficulty in accessing/interpreting information, for example, due to poor literacy.
- Bank statement in overdraft or showing debts / quick loans.
- Denied deposits due to not having enough funds.
- Mentions of other addictions / co-dependencies.
- Mentions of previous self-exclusions on other sites.
- Mental health struggles.

Apart from the signs of vulnerability, the responsible team, when reviewing an account, will take into consideration the following:

- Rejected Deposits
- Historical Rejected Deposits
- Self-exclusions (if previously applied)
- Cool-Offs (if previously applied)
- Applicable Limits
- Historical Limit Changes (if previously applied)
- Cancelled Withdrawals
- Historical Cancelled Withdrawals
- Last High Losses

- Late-night betting

With these facts, the team will be able to take a complete overview of the player and will take action accordingly to ensure a high level of player protection.

8.1 Affordability

The Company understands that players may require additional safeguards to ensure they play within their own means.

For players with a higher risk level, or where the information in the account is not enough to make a decision, we will seek to obtain additional information directly from the player, via third-party tools, or from other available sources.

Additionally, we have in place credit health risk score-based limitations. Open sources may be consulted to better build a profile of the customer, and under certain circumstances, documentation will be requested from the player to establish the financial situation of the player.

8.2 Interaction and intervention

The goal of the responsible team is to interact with those players at risk of suffering gambling problems in order to prevent and protect them from further negative consequences.

Based on the review carried out by the responsible team, the player interaction includes:

- **Contacting the player:** When a player displays at-risk behavior, the responsible team will reach out to the player in order to secure an interaction.
- **Restrictions:** In some cases, implementing restrictions may be warranted by arising triggers or red flags on the player's behavior.
- **Proactive Closures:** for players with a particularly high-risk level, we may need to prevent access to gambling on the site completely, for a shorter break, or in some cases permanently.
- **Continued Monitoring:** players with a higher risk level will be put under continuous monitoring, in order to review changes in behavior and also to evaluate changes following interactions carried out by dedicated staff.

9. Self Assessment & Help resources

The Company provides the players with the option to access a detailed record of their account history of at least 6 months.

Players are encouraged to assess their gaming habits to determine whether their gambling remains within healthy limits. A series of questions designed to identify signs of potential problematic behavior are available in the Company's websites. They are also being advised to seek for additional assistance through redirecting them to a 20-question quiz published by Gamblers Anonymous, which is available on their official website.

A player who has admitted to problematic gambling behavior, or has been deemed to be a high risk by the Responsible Gambling team, will also be referred to appropriate independent help organizations that specialize in gambling problems. Wherever possible, we will direct players to localized help assistance.

Help-organizations: Our company facilitated links and contact details to help organizations on our website, as well as on the responsible gambling page on the site. During communication with players, we aim to promote responsible gambling and will provide contact details to help organizations for individuals who may need to seek help or advice.