

Numereto B.V. 163869

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Responsible Gaming Policy

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1. Glossary of Terms and Definitions

Games of Chance

Refers to gambling activities where participants wager real money or its equivalent for the possibility of earning a monetary prize. These games are primarily governed by randomness or feature limited player influence, with outcomes not significantly impacted by player skill. Common examples include sports betting and poker.

LOK – National Ordinance on Games of Chance

This is the foundational legislation that oversees all gambling-related operations in Curaçao. It outlines the duties, restrictions, and compliance requirements for all entities providing games of chance within the jurisdiction.

Marketing, Advertising, and Promotional Campaigns

Encompasses all strategies and communications used to promote a gaming operator's offerings, such as its brand, services, or products. This may include digital outreach, printed ads, social media engagement, and other media efforts intended to draw in or retain users.

Core Program Components

These are non-negotiable elements that must be included in every Responsible Gaming framework. Their integration ensures alignment with regulatory standards while taking into account the operator's market structure and player base, ultimately fostering safer gambling behavior.

Licensed Gaming Operator

An entity that either possesses a direct consumer-facing license from the Curaçao Gaming Control Board (GCB) or has been duly certified under the Orange Digital Seal "Certificate of Operations," which authorizes it to offer gambling services legally.

Voluntary Self-Exclusion

A protective option available to players who wish to suspend access to gambling services—either fully or partially—across all platforms, domains, or brands managed by a licensed operator. This is a responsible tool to help individuals limit or pause their gambling participation.

At-Risk or Vulnerable Persons

In accordance with Article 1.1(h) of the LOK, this category includes individuals who:

- Are under the legal age of 18;
- Display problematic or addictive gambling behavior, posing a risk to themselves or others;

- Have been legally or voluntarily excluded from gambling participation;
- Have been declared bankrupt or are undergoing insolvency proceedings.

2. Overview & Commitment to Responsible Gaming

Numereto B.V., incorporated under the laws of Curaçao and operating under license number OGL/2024/315/0489 as issued by the Curaçao Gaming Control Board, is fully committed to delivering a gaming experience that prioritizes safety, integrity, and social responsibility. We firmly believe that gambling should be a form of entertainment—never a source of distress or harm.

In fulfilling both its regulatory duties and ethical responsibilities, Numereto B.V.:

- Integrates Responsible Gaming principles across all areas of its operations and corporate strategies;
- Has developed a comprehensive Responsible Gaming Policy that aligns with the stipulations of the National Ordinance on Games of Chance (LOK);
- Submits and maintains this policy via the GCB Licensee Portal to ensure open access and regulatory transparency;
- Actively evaluates and refines its responsible gambling framework in response to player behavior trends and market developments.

This document outlines the structured measures we implement to support responsible gambling, including risk management tools, preventive controls, and player support services. These initiatives are designed to help individuals manage their gaming activity responsibly while ensuring full compliance with relevant legal and licensing requirements.

3. Safeguarding Players and Adhering to Regulatory Obligations

Numereto B.V. upholds strict Responsible Gaming standards to ensure the protection of players and the integrity of its operations. In accordance with the National Ordinance on Games of Chance (LOK), the following protective mechanisms are embedded in our business practices:

- **Age Verification** – Comprehensive identity verification processes are enforced to confirm that all users are of legal gambling age before gaining

access to our services.

- **Accessible Responsible Gaming Information** – Clear and readily available Responsible Gaming resources are integrated across all platforms to educate and guide players.
- **Self-Assessment Tools** – Users are encouraged to utilize voluntary self-evaluation questionnaires to better understand their gambling behavior and risks.
- **Player Activity Monitoring** – Advanced behavioral tracking methods are employed to detect early indicators of problematic gambling behavior.
- **Break and Self-Exclusion Features** – Players can activate cooling-off periods or permanent self-exclusion options that apply universally across all affiliated platforms.
- **Deposit Limit Functionality** – Users may configure personalized deposit caps to help maintain control over their financial exposure.

In addition to player-facing safeguards, Numereto B.V. ensures that all parties involved in marketing, customer support, or promotional efforts are trained in responsible gaming practices. This includes:

- **Training and Awareness Programs** – Mandatory Responsible Gaming training is provided to employees, marketing affiliates, influencers, and other third parties involved in player engagement.
- **Ethical Marketing Practices** – All advertising materials undergo compliance checks to prevent targeting of minors, individuals who have self-excluded, or players identified as vulnerable.

To guarantee that these measures are consistently upheld, Numereto B.V. appoints a Responsible Gaming Officer (RGO) to oversee implementation and compliance. In the RGO's absence, these duties are assigned to the Compliance Officer.

Key responsibilities of the Compliance Officer include:

- Conducting a yearly audit of Responsible Gaming systems and assessing their effectiveness;

- Delivering a formal performance report, inclusive of insights and improvement suggestions, to senior management;
- Notifying the GCB in a timely manner of any updates or changes to the Responsible Gaming Policy.

Numereto B.V. is committed to minimizing gambling-related harm through a multi-layered approach that includes:

- A clearly defined Responsible Gaming Policy outlining internal expectations and procedures;
- A robust toolkit of player protections such as limit-setting options, self-assessment forms, exclusion capabilities, and educational resources;
- Real-time behavioral analytics to flag and address early signs of risky gambling behavior;
- Total regulatory alignment through ongoing audits, policy updates, and transparent engagement with the regulator.

4. Access to Support Resources and Informational Tools

Numereto B.V. is committed to empowering players with the information, resources, and tools they need to make informed, healthy decisions about their gambling activity. By embedding support features directly within our platform, we foster autonomy, promote safe play, and ensure consistent regulatory compliance.

Easy Access to Protection Tools and Educational Materials

Responsible Gambling resources are seamlessly woven into the design and navigation of our platform, ensuring players can find and use them with ease. These key elements include:

- **Prominent Homepage Placement**
A clearly visible link to our Responsible Gaming Policy is available directly from the homepage, enabling immediate access without disrupting the user experience.
- **Multilingual Accessibility**
To accommodate our international user base, responsible gaming content is provided in English, with translations made available based on the language

preferences of our primary markets.

- **Immediate Access to Player Controls**

All registered users have the option to use integrated tools that support safer gambling practices, including:

- **Self-Exclusion Options** to restrict access to their account for a predetermined duration;
- **Short-Term Breaks** via Cooling-Off periods;
- **Deposit Limit Settings** to manage personal financial thresholds.

Direct Support Channels for Player Assistance

Our trained support staff is available through multiple communication channels, such as live chat and email, to assist players with any Responsible Gaming inquiries. This includes guidance on activating protection tools or seeking further support.

Policy Integration within Platform Terms

To ensure legal clarity and transparency, our Responsible Gaming Policy is fully referenced in the platform's Terms and Conditions. Key features include:

- Clear explanation of player rights and available support mechanisms;
- One-click access to the full Terms from the homepage;
- On-demand review of responsible gambling practices by any user at any time.

Regulatory Information in the Website Footer

To reaffirm our regulatory responsibilities and licensed status, the platform footer prominently displays the following:

- A declaration restricting site access to users aged 18 and older;
- Numereto B.V.'s legal name, incorporation number (163869), and registered business address;
- Our official license number, **OGL/2024/315/0489**, issued by the Curaçao Gaming Authority;

- Confirmation of oversight by the Curaçao Gaming Control Board (GCB);
- A direct link to our Responsible Gaming Policy;
- Display of the GCB's digital compliance seal, confirming our regulatory authorization.

Linking to Professional External Support Services

Acknowledging the importance of expert assistance, Numereto B.V. also provides direct access to trusted third-party organizations that specialize in gambling addiction treatment and prevention. These links ensure that players seeking confidential, professional help can find it quickly and discreetly.

5. Verification of Age and Player Access Controls

Numereto B.V. upholds a strict no-tolerance policy when it comes to underage gambling. In full alignment with the National Ordinance on Games of Chance (LOK) and under the supervision of the Curaçao Gaming Authority, individuals below the age of 18 are categorically prohibited from registering, depositing funds, or participating in any form of gambling on our platform. Any account suspected or proven to be operated by a minor is subject to immediate intervention.

Multi-Layered Age Verification Strategy

To ensure that only legally eligible individuals gain access to our services, Numereto B.V. employs a comprehensive, multi-tiered verification process that includes the following key steps:

- **Age Declaration at Registration**
New users must enter their date of birth and confirm that they are 18 years of age or older during account creation.
- **Submission of Valid Identification**
At designated Know Your Customer (KYC) and Anti-Money Laundering (AML) checkpoints—or earlier if age discrepancies are suspected—players are required to provide official identification, such as a national ID card, passport, or driver's license, to validate their age and identity.
- **Payment Method Validation**
Verification of selected payment instruments (e.g., debit/credit cards or e-wallets) may be conducted to further ensure the account holder's age and

identity align, preventing unauthorized or underage use.

Handling of Suspected Minor Activity

Should there be any indication that a user may be underage, precautionary measures are triggered immediately, including the temporary suspension of the account pending investigation. If it is confirmed that the individual is a minor:

- The account will be permanently deactivated;
- Remaining account balances will be returned only after legal and AML compliance checks;
- All winnings will be voided in accordance with regulatory policy;
- The individual will receive a clear explanation regarding the closure of their account.

Enhanced Security and Identity Confirmation

In cases where additional verification is warranted, Numereto B.V. may implement further identity confirmation steps, such as:

- **Proof of Residence**, including utility bills or official bank communications;
- **Live Photo Verification**, requiring the user to upload a real-time selfie while holding their ID document;
- **Database Authentication**, using trusted third-party services to validate submitted personal details;
- **Proactive Age Checks**, initiated at any time age-related concerns arise;
- **Audit-Ready Logging**, maintaining detailed records of every verification step for compliance review.

Encouraging Safe Digital Environments at Home

Numereto B.V. promotes shared responsibility in protecting minors from gambling exposure. We encourage parents and guardians to take the following actions:

- Limit access to personal devices and saved payment options;

- Utilize filtering software or parental controls to block gambling-related content.

Recommended tools include:

- **Net Nanny**
- **GamBlock**
- **CyberSitter**

Ongoing Commitment to Youth Protection and Compliance

Numereto B.V. remains steadfast in its mission to shield minors from gambling access. Through rigorous verification processes, real-time monitoring, and advocacy for responsible internet use at home, we maintain strict compliance with Curaçao's legal standards and operate with the highest level of social responsibility.

6. Self-Evaluation for Gambling Risks

Numereto B.V. emphasizes the importance of self-reflection as a key element of responsible gambling. We actively encourage players to regularly evaluate their gaming behavior to ensure it remains a source of entertainment rather than harm. To aid in this process, we provide accessible tools and resources that empower users to assess their gambling habits and make well-informed choices.

Access to Betting and Financial History

From the moment a user account is established, players can access a complete, timestamped record of their gameplay and financial transactions. This includes details such as:

- Bets placed and their outcomes
- Deposit and withdrawal history
- Overall account activity over time

This information allows users to monitor their spending patterns and detect any emerging signs of problematic behavior.

Interactive Self-Assessment Tools

Numereto B.V. offers user-friendly self-assessment questionnaires, developed using established behavioral research frameworks. These tools are designed to help players:

- Reflect on the frequency and nature of their gambling;
- Recognize potential red flags in their behavior;
- Determine whether additional support or intervention may be beneficial.

Taking Action Based on Assessment Results

If a user's responses suggest that their gambling may be becoming unhealthy, we encourage them to utilize the available Responsible Gaming features, such as:

- **Deposit Limits** to manage how much they can spend over a set period;
- **Self-Exclusion** options to block access to their account for extended periods;
- **Cooling-Off Periods** for temporary breaks to regain control and clarity.

External Support Resources

Numereto B.V. also provides direct access to professional, third-party support organizations that specialize in gambling addiction and mental health services. This ensures that users have a pathway to expert help when needed—confidentially and without delay.

7. Player Monitoring and Behavioural Insight Mechanisms

Numereto B.V. utilizes a sophisticated behavioral monitoring system that combines real-time analytics with dedicated human oversight. This hybrid model allows us to detect emerging signs of gambling-related risk and intervene in a timely, responsible manner—fully compliant with the regulatory framework set by the Curaçao Gaming Control Board (GCB).

Identifying Risk Indicators Through Behavioral Tracking

Our monitoring tools continuously assess player behavior across several key indicators to detect potential problem gambling. Data insights are drawn from player transactions, session durations, gameplay intensity, and platform interactions. Certain patterns may prompt internal alerts, including:

- Sudden increases in deposit amounts or frequency;
- Attempts to bypass financial controls by switching payment methods;
- Cancelled withdrawals, particularly when done frequently or impulsively;
- Prolonged gaming sessions without sufficient rest or breaks;
- Persistent contact with support, particularly regarding bonuses or emotional stress;
- Frequent modifications to account limits or repeated activation of cooling-off periods;
- Elevated engagement with high-risk games (e.g., slots or live casino), especially among younger users under 25;
- Use of multiple payment sources or reliance on credit-based funding;
- Spending behavior that appears misaligned with known financial capacity;
- Efforts to create duplicate accounts to evade existing restrictions or exclusions.

Ongoing Behavioral Profiling and Adaptive Surveillance

Each user develops a behavioral profile over time, shaped by their gameplay, financial activity, and account interactions. This profile is continually updated. If behavior deviates from expected norms, the Responsible Gaming team is automatically notified to conduct a thorough review.

Intervention and Risk Reduction Measures

When concerning behavior is identified, Numereto B.V. initiates a proactive, structured intervention process tailored to the individual. Responses may include:

- **Direct Outreach** by trained Responsible Gaming specialists who offer support and resources;
- **Account Adjustments**, such as lowering deposit limits or restricting access to certain games;

- **Temporary Account Suspension** to provide players with time for reflection and self-regulation;
- **Permanent Exclusion** in cases of persistent or high-risk gambling behavior.

Empowering Staff Through Specialized Training

All customer-facing personnel—including support agents, VIP managers, and Responsible Gaming representatives—undergo targeted training to identify early warning signs and respond appropriately. Staff are taught to:

- Spot emotional or behavioral red flags, such as erratic communication or signs of distress;
- Communicate with empathy while providing guidance on available protective tools;
- Encourage the use of responsible gambling features such as self-exclusion, deposit limits, and time-outs;
- Document player interactions thoroughly to support transparency and compliance reviews.

Escalation Protocols for High-Risk Cases

When a player's activity raises significant concern, the matter is escalated to the Responsible Gaming Officer or, in their absence, the Compliance Officer (excluding AML personnel). Depending on the severity, actions may include:

- Imposing tighter restrictions or full account closure;
- Encouraging the user to seek professional help through external support services;
- Reporting the case to the Curaçao Gaming Authority, in line with mandatory reporting requirements.

8. Short-Term Account Break (Cooling-Off Option)

Numereto B.V. provides players with a convenient, user-friendly option to temporarily suspend their gaming activity through our self-activated cooling-off feature. This tool

is designed to encourage responsible gambling by offering players the space to pause, reflect, and regain control over their gaming habits—free from pressure or delays.

Easy Access and Customizable Durations

The cooling-off feature is easily accessible through the player's account dashboard, allowing users to initiate a break from gambling with just one click—no need for staff approval or email requests. The interface clearly presents this option, offering several suspension durations to suit varying needs:

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

Players may apply the restriction to specific types of games or opt to block access to all gambling services on the platform, depending on their preference.

Immediate Activation and Account Lockdown

Once a player selects a cooling-off period:

- The restriction is applied instantly, preventing all gambling activity on the account for the chosen duration;
- Users receive information clarifying the distinction between a temporary break and long-term self-exclusion, along with guidance on how to upgrade to a more extended exclusion if needed;
- Players are also given the choice to pause all marketing messages during this period, avoiding any promotional communication.

No Obstruction or Delay in Activation

Numereto B.V. upholds a strict policy against any attempts to discourage or delay a player's decision to take a break. The following practices are explicitly prohibited:

- Persuading users to reconsider their decision;

- Adding unnecessary waiting times before activation;
- Sending incentives, bonus offers, or any promotional content to players during or before their cooling-off period.

If technical limitations prevent full automation of this process, all cooling-off requests will be handled manually by our support team without delay to ensure immediate protection.

Automatic Account Reactivation and Next Steps

Once the selected cooling-off period expires, account access is automatically restored—no action is required from the player. However, if users feel they need more time away, they are encouraged to explore other time-out options or activate a full self-exclusion to extend their break.

9. Long-Term Self-Exclusion

Numereto B.V. provides a comprehensive and easily accessible self-exclusion system for individuals seeking an extended or permanent break from gambling. This protective measure is designed to support players in regaining control over their gaming habits and is implemented immediately upon request across all platforms operated by Numereto B.V.

How to Initiate Self-Exclusion

Players can activate self-exclusion directly from the platform via a clearly visible option. The process includes:

- A step-by-step guide outlining how to complete the exclusion;
- A list of available duration options;
- Educational content highlighting how self-exclusion promotes responsible gambling and player welfare.

Immediate Effect and Irreversibility

Once a player selects self-exclusion:

- The account is immediately deactivated, blocking all gambling-related actions including deposits, bets, and withdrawals;

- Stored payment methods are disabled to prevent future transactions;
- The player is added to Numereto B.V.'s internal Self-Exclusion Register, where records are maintained for a minimum of seven years;
- Players are advised to consider excluding themselves from other gambling platforms for comprehensive protection;
- Detection systems are employed to prevent attempts at account duplication or bypassing restrictions.

Duration Options for Self-Exclusion

In accordance with Clause 5.4(2) of the National Ordinance on Games of Chance (LOK), users may choose from the following self-exclusion periods:

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

During the selected period, the self-exclusion cannot be reversed. Numereto B.V. strictly prohibits any attempts to interfere with a player's decision to self-exclude, including:

- Persuading players to reconsider;
- Creating unnecessary delays in processing;
- Offering bonuses, promotions, or incentives to continue gambling.

Players may opt for full exclusion across all services or restrict access to specific categories of games.

Account Status and Funds Handling

When full self-exclusion is applied:

- The account is rendered inactive and inaccessible for gambling activity;
- Any available balance, unless frozen due to AML procedures, is refunded to the original payment method within two business days;
- The player's contact information is removed from all marketing distribution lists.

For partial exclusions (limited to specific game types), access is restricted accordingly.

Reactivation Following Self-Exclusion

At the end of the self-exclusion term, players must manually request to restore account access. This process includes:

- Submission of a formal reactivation request;
- Delivery of a Responsible Gaming reminder and educational materials;
- A recommendation to complete a self-assessment tool, such as the Gamblers Anonymous 20-Question Test.

The existing account will be reactivated—users may not create new accounts to circumvent this process.

Restrictions on Marketing and Communication

During and after the exclusion period:

- No gambling-related marketing or promotional materials will be sent;
- Players will not be contacted about gaming services unless required for compliance or security purposes.

Unlike cooling-off periods, which expire automatically, self-exclusion remains in effect until the user formally requests reactivation.

Compliance Logging and Reporting

All self-exclusion activity is logged in real time. If a self-excluded or underage user gains access to the platform:

- Access is immediately revoked;
- Remaining funds are returned (unless subject to AML investigation) within two business days;
- A detailed incident report is submitted to the Curaçao Gaming Authority (GCB) within five working days, including any corrective measures taken.

Operator-Enforced Exclusion

Numereto B.V. reserves the right to impose exclusion without player request if:

- There is clear evidence of problematic gambling behavior;
- The user is experiencing financial distress linked to gambling activity;
- The player is found engaging in fraudulent or illegal conduct.

Such operator-initiated exclusions are recorded and retained for at least five years, with documentation made available to the GCB upon request.

10. Financial Control Features and Deposit Limit Tools

Numereto B.V. empowers players to maintain control over their gambling activity through a set of practical financial limit tools. These controls are designed to foster healthy gaming habits, minimize impulsive behavior, and support overall player well-being over time.

Flexible Deposit Limit Configuration

Users can configure deposit limits directly through their account settings, selecting from daily, weekly, or monthly thresholds that align with their personal budgeting preferences. These self-regulated boundaries serve as a vital component of responsible gambling and come with the following safeguards:

- **Automatic Enforcement**
Once a user reaches their pre-set deposit threshold, further deposits are automatically blocked until the time-based limit resets.
- **Immediate Reductions Permitted**
Players may lower their limits at any time, and the change is applied instantly

to enhance protection and reduce potential risk.

- **Waiting Period for Increases**

Any request to increase an existing deposit limit triggers a mandatory **seven-day cooling-off period**, ensuring players have adequate time to reconsider their decision before the adjustment becomes active.

Gameplay Handling When Limits Are Reached

In the event that a deposit limit is reached during active gameplay, the current session may continue uninterrupted to preserve fairness. However:

- No new deposits will be accepted during the restricted period;
- Players will be prevented from placing additional wagers once existing funds are depleted;
- Access to new gaming activity will remain blocked until the next reset period begins.

This system ensures that responsible gaming protocols are upheld without disrupting the integrity of ongoing play.

Promoting Financial Responsibility and Transparency

Numereto B.V. is dedicated to maintaining a transparent environment where players can manage their gambling responsibly. All financial limit tools are built for simplicity and immediate use, ensuring that players are fully informed and in control of their spending.

These budgeting features are integral to our Responsible Gaming framework and demonstrate our continued commitment to meeting the Curaçao Gaming Authority's standards for player protection and regulatory compliance.

11. Time Tracking and Gameplay Notifications

Numereto B.V. employs real-time session tracking tools to help players remain conscious of the time they spend gambling. By promoting time awareness during gameplay, we support responsible decision-making and contribute to a more balanced and sustainable gaming experience.

Real-Time Session Timer

To ensure transparency and encourage healthy play habits, a continuously visible session timer is integrated into the player interface. This timer:

- Displays the total time spent during the current gaming session;
- Updates automatically in real time, providing accurate tracking without interruptions;
- Remains permanently visible during gameplay and cannot be disabled by the user.

This live tracker serves as a subtle but effective prompt, encouraging players to pause, reflect, and manage their engagement with intention.

Supporting Responsible Play Through Time Awareness

By embedding this feature directly within the gaming environment, Numereto B.V. encourages players to develop greater awareness of their habits and take timely breaks as needed. This approach aligns with our broader Responsible Gaming objectives and fosters a culture of self-regulation.

Commitment to Compliance and Player Safety

The session tracking functionality is an essential component of Numereto B.V.'s Responsible Gaming Policy and reflects our compliance with the guidelines established by the Curaçao Gaming Authority. Through this tool, we reinforce our dedication to transparency, player protection, and ethical gaming practices.

12. Responsible Marketing

Numereto B.V. maintains a marketing philosophy centered on transparency, responsibility, and ethical communication. All promotional activities—whether conducted in-house or via external affiliates, influencers, or third-party partners—are carefully designed to support responsible gambling and protect vulnerable individuals from potential harm.

Commitment to Responsible Promotion

Marketing efforts are governed by strict internal standards aligned with our Responsible Gaming Policy. These standards ensure that advertising never glamorizes gambling, misleads users, or targets individuals who are at risk.

Regulatory Compliance and Advertising Principles

To comply with the Curaçao Gaming Authority's guidelines, Numereto B.V. applies the following advertising rules across all promotional materials:

- **Truthful and Transparent Messaging**
All advertisements must be factually accurate, easy to understand, and free from exaggerated or manipulative claims.
- **No Engagement with Vulnerable Audiences**
Underage individuals, self-excluded players, and those showing signs of gambling-related harm are explicitly excluded from marketing outreach.
- **No Financial Misrepresentation**
We never position gambling as a financial solution, a stable source of income, or a method for recovering losses.
- **Accurate Portrayal of Games**
Games of chance are never advertised as skill-based unless skill plays a true and significant role in outcomes.
- **No Emotional Manipulation**
Promotions must not exploit personal struggles or emotional states such as anxiety, loneliness, or stress.
- **Child-Protective Advertising**
Content that could appeal to minors—including cartoon themes or youthful imagery—is strictly prohibited.
- **Influencer Partnerships with Integrity**
Numereto B.V. only collaborates with public figures and influencers whose audiences are predominantly adults and free from underage exposure.
- **Avoidance of Inappropriate Content**
Promotional materials do not include content associated with excessive drinking, drug use, or any form of risky or offensive behavior.

Clarity in Bonuses and Promotions

All promotional offers issued by Numereto B.V. are accompanied by full disclosure and plain-language terms. This includes:

- Transparent bonus terms and wagering requirements;

- Clear eligibility criteria;
- A strict ban on suggesting that bonuses are a way to recover losses or ensure wins.

Embedding Responsible Gambling Messages

Every communication channel used for marketing—whether digital or offline—incorporates responsible gambling elements, such as:

- Visible disclaimers reminding users to play responsibly;
- Age-gated content for social media posts, ensuring visibility only to users aged 18+;
- Full exclusion of self-excluded or restricted players from direct marketing (email, SMS, app notifications);
- Event sponsorships and merchandise campaigns that strictly adhere to responsible marketing guidelines.

Oversight of Affiliate and Influencer Partners

Numereto B.V. enforces a zero-tolerance approach to non-compliant partnerships. All external promoters must adhere to strict requirements:

- Legally Binding Agreements that mandate full compliance with ethical advertising standards;
- Regular Audits to verify ongoing adherence to marketing policies;
- Swift Disciplinary Action, including contract termination, for any breach of conduct.

Influencers must:

- Confirm that their platforms target an audience that is primarily 18 years or older;
- Avoid engaging with minors or vulnerable individuals;

- Promote gambling in a factual, non-sensationalized manner that supports safe play.

Public Exposure and Brand Placement

Numereto B.V. maintains strict controls over where and how its brand appears in public:

- Branding is never placed in venues, publications, or events geared toward minors;
- Sponsorships are avoided at youth-focused gatherings;
- Responsible gaming disclaimers are consistently included in all sponsored placements.

Upholding Ethical Standards in Promotion

Numereto B.V. takes pride in its responsible approach to advertising. Through clear, honest communication, rigorous partner vetting, and ongoing oversight, we ensure that our promotional efforts reflect our dedication to player protection, ethical conduct, and regulatory compliance.

