

GEOSIX B.V. (163931)
License Number: OGL/2024/316/0598

RESPONSIBLE GAMING POLICY

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1. Terminology and Key Definitions

Games of Chance

This refers to gambling activities in which participants wager real money or its equivalent in pursuit of a monetary reward. Such games are primarily determined by luck or a combination of chance and minimal user input, with little or no capacity for players to influence the outcome. Poker and sports betting are typical examples.

LOK (National Ordinance on Games of Chance)

The core legislative framework governing gambling operations within Curaçao. It prescribes the regulatory obligations and conduct requirements for licensed operators providing games of chance.

Marketing, Advertising & Promotional Activities

These include all strategies and content aimed at promoting an operator's brand, services, or products. The term encompasses digital campaigns, printed advertisements, social media outreach, and any other forms of media utilized to attract or retain customers.

Mandatory Elements

These constitute essential components that must be embedded within every Responsible Gaming program. They are adapted to align with the operator's business model and target audience, ensuring adherence to regulatory expectations and encouraging responsible play.

Licensed Operator

An entity that has been granted a direct B2C license by the Curaçao Gaming Control Board (GCB), or has received formal recognition through an Orange Digital Seal "Certificate of Operations," enabling it to legally offer gambling services.

Self-Exclusion

A voluntary measure that allows individuals to restrict their access—either partially or fully—to gambling activities across all platforms and brands operated by the same license holder. This feature helps players regain control over their gambling behavior.

Vulnerable Individuals

As stipulated in Article 1.1(h) of the LOK, this classification applies to individuals who:

- Are under the age of 18;
 - Exhibit an inability to manage their gambling behavior and face potential or existing risk of harm to themselves or others;
 - Have been formally or voluntarily excluded from gambling;
 - Have been declared insolvent or bankrupt.
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2. Introduction to the Responsible Gaming Policy

Geosix B.V., a company incorporated in Curaçao and licensed under number OGL/2024/316/0598 by the Curaçao Gaming Control Board, is committed to maintaining a gaming environment that is secure, transparent, and socially responsible. At the core of our operations lies the principle that gambling should remain a recreational activity—not a source of harm.

In pursuit of both regulatory compliance and corporate responsibility, Geosix B.V.:

- Integrates Responsible Gaming principles into its operational framework and decision-making processes;
- Maintains a formal Responsible Gaming Policy that satisfies the requirements outlined in the National Ordinance on Games of Chance (LOK);
- Publishes and updates this policy via the GCB Licensee Portal to ensure transparency and support regulatory supervision;
- Regularly evaluates and enhances its Responsible Gaming procedures to respond to evolving market conditions and user behaviors.

This policy outlines our structured approach to responsible gambling and includes the various tools, safeguards, and support systems we provide to help users maintain control over their gambling behavior while ensuring compliance with all applicable laws and license conditions.

3. Player Protection Measures and Regulatory Compliance

As a holder of a valid gaming license under the jurisdiction of the Curaçao Gaming Control Board (GCB), Geosix B.V. adheres to a set of core Responsible Gaming requirements designed to protect players and uphold operational integrity. In accordance with the National Ordinance on Games of Chance (LOK), we implement the following safeguards:

- **Age Verification** – A thorough identity verification process is enforced to confirm that all users meet the legal age requirement for gambling participation.
- **Information Transparency** – Responsible Gaming materials are prominently available across all user interfaces to provide accessible guidance and support.
- **Self-Evaluation Tools** – Players are offered optional self-assessment instruments to review their gambling habits and make informed decisions.
- **Behavioral Monitoring** – Player activities are continuously monitored to identify indicators of potentially harmful behavior through data analysis.

- **Cooling-Off and Self-Exclusion Options** – Features enabling temporary or permanent account suspension are available across all platforms and brands.
- **Deposit Controls** – Players may set financial limits on their deposits to better manage their spending.

Geosix B.V. also ensures that any individual or third party involved in player interaction or promotional activity is appropriately trained in responsible gaming practices. This includes:

- **Staff Training and Awareness** – Employees, affiliates, social media promoters, and marketing partners are educated in Responsible Gaming protocols.
- **Marketing Compliance** – Promotional content is reviewed to ensure it does not target minors, self-excluded users, or individuals deemed vulnerable.

To oversee the implementation and effectiveness of these measures, a designated Responsible Gaming Officer (RGO) is appointed. In the RGO's absence, the Compliance Officer assumes these responsibilities.

The Compliance Officer is tasked with:

- Conducting a comprehensive annual evaluation of Responsible Gaming procedures and their effectiveness;
- Compiling and submitting a performance report containing analyses and recommendations to executive leadership;
- Promptly informing the GCB of any policy updates or modifications.

Geosix B.V. remains firmly committed to protecting the welfare of its users by implementing:

- A formalized Responsible Gaming framework integrated throughout operations;
- A suite of support tools including deposit limits, self-assessments, self-exclusion options, and session reminders;
- Proactive behavioral monitoring systems to detect and address risky activity;
- Full regulatory compliance through policy refinement, audit participation, and transparent reporting.

These measures collectively form a comprehensive strategy that promotes responsible gaming and aligns with Curaçao's regulatory framework.

4. Access to Information and Support Services

Geosix B.V. prioritizes transparency and accessibility as fundamental components of its Responsible Gaming strategy. We are committed to providing players with the knowledge, tools, and assistance necessary to make informed, safe decisions. By embedding these resources throughout the user experience, we foster accountability and empower players to exercise control over their gambling behavior.

Seamless Integration of Support Resources

Responsible Gaming tools and educational content are directly integrated into our platform's design, making them readily available to users at all stages of their engagement. Key elements include:

- **Homepage Accessibility**
A visible and easily identifiable link to our Responsible Gaming Policy is featured on the homepage, enabling players to access essential information without navigating away from primary site areas.
- **Multilingual Support**
Recognizing our diverse player base, the Responsible Gaming Policy and related resources are available in English and may be translated into additional languages that align with our audience demographics.
- **Self-Exclusion**
Functionalities to restrict access for a defined period.
- **Cooling-Off**
Options for temporary breaks.
- **Deposit Limits**
Availability for users to manage financial exposure.

Direct Support Availability

Support channels are available for players seeking assistance with Responsible Gaming matters. Our trained support staff can be contacted via live chat or email to answer questions, provide information, or assist in activating protection tools.

Integration with Platform Terms

In compliance with regulatory requirements, our Responsible Gaming Policy is referenced within the Terms and Conditions of the platform. This ensures:

- Transparency regarding the rights and available safeguards for players;
- Immediate access to the Terms from the homepage;

- Consistent visibility and availability for users to review Responsible Gaming provisions at their convenience.

Website Footer Compliance Information

Legal and regulatory disclosures are consistently displayed in the website footer, including:

- An 18+ age restriction statement;
- Company name, incorporation number, and registered address of Geosix B.V.;
- Our gaming license number (OGL/2024/316/0598) issued by the Curaçao Gaming Authority;
- Confirmation of oversight by the Curaçao Gaming Control Board;
- A direct link to our Responsible Gaming Policy;
- Display of the Curaçao GCB digital seal to verify regulatory compliance.

Access to Independent Support Services

Geosix B.V. acknowledges the importance of professional, external assistance. As part of our commitment, we provide links to reputable third-party organizations offering confidential help and counseling for individuals experiencing gambling-related challenges.

By ensuring continuous access to educational resources, protective tools, and support services, Geosix B.V. reinforces its commitment to player well-being and regulatory transparency.

5. Age Verification Procedures and Access Restriction Tools

Geosix B.V. enforces a strict zero-tolerance policy toward underage gambling. In accordance with the National Ordinance on Games of Chance (LOK) and under the governance of the Curaçao Gaming Authority, individuals below the age of 18 are strictly prohibited from registering, funding accounts, or engaging in any gambling activity on our platform. Any account found or suspected to be associated with a minor is subject to immediate and decisive action.

Comprehensive Age Verification Framework

To safeguard access, Geosix B.V. utilizes a multi-step verification process involving several key checkpoints:

- **Age Confirmation at Registration**

Users must enter their date of birth and confirm that they meet the legal age threshold of 18 or older during account creation.

- **Submission of Government-Issued Identification**

Players may be required to upload a valid ID (e.g., passport, national ID card, or driver's license) to confirm age and identity. This requirement is mandatory during Know Your Customer (KYC) and Anti-Money Laundering (AML) stages, or earlier in cases of age-related discrepancies.

- **Payment Method Verification**

To prevent underage access, additional validation of the chosen payment method (such as credit cards or e-wallets) may be performed to detect inconsistencies.

Response to Suspected or Confirmed Underage Access

Should there be reason to believe that an account is being used by a minor, Geosix B.V. will promptly:

- Suspend the account pending verification;
- Permanently terminate the account if underage use is confirmed;
- Refund any remaining balance following a legal and AML review;
- Void all winnings in accordance with legal provisions;
- Notify the individual regarding account closure and the reasons behind it.

Enhanced Verification Measures

Where necessary, additional security steps may include:

- Proof of residential address through official documents such as utility bills or bank statements;
- Real-time photo identification (e.g., a selfie holding an ID document);
- Third-party data validation to verify submitted information;
- Early age verification where concerns arise;
- Comprehensive documentation of verification procedures for auditing purposes.

Promoting Parental Responsibility

Geosix B.V. encourages guardians to take proactive steps to prevent minors from accessing gambling platforms. Recommendations include:

- Restricting access to devices and stored payment credentials;
- Utilizing content-filtering and parental control software.

Suggested tools include:

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

Ongoing Commitment to Youth Protection

Through robust age verification procedures, responsive detection systems, and educational outreach, Geosix B.V. remains fully committed to preventing underage access and upholding the highest standards of legal and ethical compliance in Curaçao.

6. Personal Risk Assessment

Geosix B.V. actively promotes self-awareness as a central aspect of responsible gambling. We encourage all players to regularly reflect on their gaming behavior to ensure that their activities remain balanced and enjoyable. To support this, we provide tools that enable users to assess their own habits and make informed decisions.

Review of Gambling Activity

From account registration onward, users have full access to a detailed log of their activity, including:

- Wager history and outcomes;
- Deposit and withdrawal records;
- Timestamped session data for accurate tracking.

Reviewing this history can help users better understand their spending habits and identify behaviors that may warrant attention.

Interactive Self-Assessment Tools

Geosix B.V. offers scientifically developed self-evaluation tests that guide players in reviewing the frequency and intensity of their gambling. These tools are designed to identify early warning signs of problematic behavior and prompt timely intervention if needed.

If a self-assessment indicates the potential for harm, players are encouraged to use the Responsible Gaming features available on the platform, including:

- Setting deposit limits to manage financial exposure;
- Activating self-exclusion to restrict access;
- Utilizing cooling-off periods to take short-term breaks.

Additionally, players are provided with direct links to external organizations offering expert support in gambling addiction and mental health.

By enabling players to self-reflect and access appropriate resources, Geosix B.V. upholds its commitment to safe gambling practices and aligns with the regulatory expectations of the Curaçao Gaming Control Board.

7. Behavioural Analysis and Player Monitoring

Geosix B.V. employs a proactive monitoring framework that integrates advanced data analytics with manual oversight to observe user behavior in real time. This system allows for the early identification of patterns indicative of increased risk for gambling-related harm and enables timely intervention in full compliance with Curaçao's regulatory standards.

Identification of High-Risk Gambling Indicators

The monitoring infrastructure evaluates a variety of behavioral data points—including transactional activity, gaming sessions, and platform engagement metrics—to detect warning signs. Certain behaviors may trigger internal alerts, such as:

- Unexpected increases in deposit frequency or erratic betting patterns;
- Attempts to bypass financial limits by utilizing alternative or multiple payment sources;
- Frequent cancellations of withdrawal requests, suggesting impulsive behavior or loss of control;
- Extended sessions without meaningful breaks;
- Repeated contact with customer support, particularly in relation to bonus requests or emotional distress;

- Ongoing adjustments to account limits or repeated use of cooling-off features;
- Heightened engagement with high-risk games such as live casino or slot machines, especially among players under 25 years of age;
- Use of various payment methods or reliance on credit-based funding;
- Spending levels inconsistent with a user's financial profile;
- Attempts to circumvent existing exclusions or limits by creating duplicate accounts.

Behavioural Profiling and Ongoing Surveillance

Each player is assigned a behavioral profile that evolves over time based on their transaction history, gameplay behavior, and overall engagement. If anomalous activity is detected, the system generates an internal alert, prompting a manual review by the Responsible Gaming team.

Intervention Procedures and Player Support

Where a player's conduct suggests heightened risk, Geosix B.V. follows a structured intervention protocol, which may include:

- Direct outreach from trained Responsible Gaming personnel to offer guidance and support;
- Adjustments to account parameters, including reduced deposit limits or restricted access to specific game categories;
- Temporary suspension of account access to allow the player time to reflect;
- Imposition of permanent self-exclusion in severe or repeated cases of at-risk behavior.

Staff Training and Empowerment

All front-line employees—including support representatives, VIP managers, and Responsible Gaming officers—receive comprehensive training to help them:

- Recognize behavioral and emotional red flags;
- Communicate empathetically and provide appropriate guidance;
- Promote tools such as deposit limits, time-outs, and self-exclusion;
- Maintain detailed logs of all interactions to ensure regulatory compliance.

Escalation for Critical Cases

When a player exhibits particularly concerning behavior, the matter is escalated to the Responsible Gaming Officer or, if unavailable, the Compliance Officer (excluding those assigned to AML functions). Based on the circumstances, further action may include:

- Enforcement of more stringent account restrictions or permanent exclusion;
- Referral to external gambling support organizations;
- Reporting the case to the Curaçao Gaming Authority in line with statutory reporting requirements.

Geosix B.V. is committed to early intervention, ethical player management, and regulatory compliance to ensure a safe and responsible gaming environment.

8. Temporary Play Suspension (Cooling-Off Period)

Geosix B.V. offers a self-managed cooling-off function that allows players to temporarily suspend access to gambling services. This tool is designed to encourage players to pause, reflect, and regain control without barriers or delay, supporting safer gaming behaviors.

Access and Duration Selection

Players may initiate a cooling-off period directly through their account interface. The feature is clearly displayed and does not require staff intervention. Users can choose from the following timeframes:

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

Players may apply the suspension to specific categories of games or across all gambling services, based on personal preference.

Activation Process and Enforcement

Once activated:

- The restriction takes effect immediately, and the account is locked from gambling access for the full duration;

- Players receive a clear explanation differentiating between the temporary nature of cooling-off periods and longer-term self-exclusion options, with the ability to switch if necessary;
- Users may opt to suspend marketing communications during their break.

Geosix B.V. explicitly prohibits any actions that interfere with or discourage use of the cooling-off feature, such as:

- Attempting to influence the player's decision;
- Delaying the activation process;
- Offering bonuses or incentives to continue playing.

Where automated tools are not yet fully available, all cooling-off requests will be processed manually without delay to uphold player protection.

Automatic Reactivation and Follow-Up Options

At the conclusion of the selected break, account access is restored automatically with no user action required. If players feel the need for an extended period away, they are encouraged to use additional time-out tools or activate full self-exclusion.

By making the cooling-off feature simple, immediate, and fully user-driven, Geosix B.V. affirms its commitment to responsible play and full alignment with Curaçao Gaming Control Board regulations.

9. Permanent Self-Exclusion Options

Geosix B.V. offers a robust and accessible self-exclusion feature for users seeking long-term or permanent breaks from gambling. This mechanism is intended to help players maintain control over their behavior and is enforced uniformly across all platforms operated by Geosix B.V.

Initiation Process and Accessibility

Players may activate self-exclusion directly via a clearly marked interface on the platform. The tool includes:

- A step-by-step guide through the self-exclusion process;
- A list of available exclusion durations;

- An explanation of how self-exclusion contributes to responsible gambling and personal well-being.

Immediate Enforcement and Irrevocability

Once the self-exclusion is initiated:

- The account is locked immediately, preventing deposits, wagering, and withdrawals for the selected duration;
- Stored payment methods are blocked to prevent further use;
- The individual is added to a Self-Exclusion Database, maintained for a minimum of seven years post-exclusion;
- Players are advised to consider self-exclusion on other platforms for added protection;
- Geosix B.V. employs detection systems to block the creation of duplicate accounts.

Available Duration Periods

In line with Clause 5.4(2) of the LOK, players may select one of the following durations:

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

During the selected timeframe, reversal of self-exclusion is not permitted. Geosix B.V. prohibits:

- Attempts to persuade users to reverse their decision;
- Delays in processing requests;
- Promotional incentives aimed at excluded individuals.

Users may choose to exclude from all gambling services or from specific product categories.

Account Management During Exclusion

For users opting for full exclusion:

- All gambling functions are disabled immediately;
- The account is marked inactive;
- Available balances, unless restricted under AML rules, are returned to the original payment method within two business days;
- Contact information is removed from all marketing databases.

Where partial exclusion is selected, restrictions are applied only to the relevant product categories.

Post-Exclusion Reactivation Procedure

Upon completion of the exclusion period, players must:

- Submit a written request to reactivate their account;
- Receive a reminder regarding Responsible Gaming tools;
- Be encouraged to complete a self-assessment (e.g., Gamblers Anonymous 20-Question Test).

Only the original account may be reactivated; creating a new account is not permitted.

Restrictions on Communication

During and after the exclusion period:

- No promotional messages, offers, or gambling-related communications are sent;
- Contact is limited to essential matters such as security notifications or account status updates;
- Self-exclusion remains in place until the user manually requests reactivation, unlike the automatic end of cooling-off periods.

Oversight and Reporting Obligations

Geosix B.V. maintains real-time logs of all self-exclusion actions. If a self-excluded or underage individual accesses the platform:

- Access is immediately revoked;
- Deposited funds are refunded within two business days, unless subject to AML protocols;
- A formal report is submitted to the Curaçao Gaming Authority within five working days, detailing the incident and corrective actions taken.

Operator-Initiated Exclusions

Geosix B.V. reserves the right to impose exclusion measures without player request in situations where:

- The user exhibits harmful gambling behavior;
- There are indicators of financial distress related to gambling;
- Suspicious, fraudulent, or unlawful activity is detected.

All such actions are documented and retained for at least five years and made available to the regulator upon request.

Through a structured, accessible, and enforceable self-exclusion process, Geosix B.V. demonstrates its commitment to player protection and regulatory compliance.

10. Financial Limits

Geosix B.V. provides users with a comprehensive suite of financial control tools to support responsible gambling and help manage monetary engagement. These limit-setting mechanisms are designed to foster self-regulation, prevent impulsivity, and promote sustainable gambling behavior.

Deposit Limit Functionality

Players can define their personal deposit limits directly within their account settings. These thresholds can be tailored to their preferences and are available on a:

- Daily basis
- Weekly basis
- Monthly basis

The system incorporates the following features to enhance player safety:

- **Automated Enforcement**

Once a user's set deposit limit is reached, no additional deposits are accepted until the corresponding period resets.

- **Immediate Decrease Capability**

Players may lower their limits at any time, with such changes becoming effective immediately to support proactive financial management.

- **Delayed Increase Safeguard**

Requests to increase an existing limit are subject to a mandatory seven-day waiting period, offering players time to reconsider their decision before the adjustment is applied.

Handling of Active Gameplay

If a deposit limit is reached during an ongoing session:

- The current session is allowed to conclude to preserve gameplay fairness;
- No additional deposits are permitted;
- Further wagers are blocked;
- Access to new games or activities is suspended until the limit resets.

This approach ensures that technical enforcement of deposit restrictions does not interfere with the integrity of existing gameplay.

Upholding Safety and Compliance

Geosix B.V. maintains its commitment to transparency and user empowerment by ensuring financial control tools are clearly presented and easily accessible. These features form an integral part of our Responsible Gaming framework and are consistent with the standards and expectations set forth by the Curaçao Gaming Authority.

11. Game Time Awareness and Notifications

To promote mindful engagement, Geosix B.V. employs session monitoring tools that enable players to track their time spent on the platform. This measure is designed to encourage players to remain aware of their gaming behavior and to foster safer, more informed decision-making.

Continuous Session Timer

While logged in, players are shown a real-time session duration tracker that:

- Is continuously visible during gameplay;
- Updates automatically to reflect ongoing time;
- Cannot be disabled or hidden by the user.

The aim of this tool is to encourage users to consider breaks, evaluate their time spent gambling, and make use of available responsible gaming features as needed.

Reinforcing Responsible Gaming Practices

By embedding session time tracking directly within the user experience, Geosix B.V. supports user awareness and self-regulation. This initiative contributes to a broader effort to promote sustainable gambling habits and aligns with our commitment to player protection under Curaçao Gaming Control Board regulations.

12. Marketing and Advertising Ethics

Geosix B.V. adopts a responsible and ethical approach to all marketing and promotional activities. We ensure that our communications reflect integrity, social responsibility, and full compliance with regulatory standards. Advertising efforts are carefully designed to avoid encouraging harmful behavior or targeting vulnerable individuals.

All promotional campaigns, whether executed internally or through third-party affiliates, influencers, or partners, are subject to stringent standards consistent with our Responsible Gaming Policy.

Adherence to Advertising Standards

In alignment with the Curaçao Gaming Authority's requirements, all marketing communications observe the following principles:

- **Honesty and Clarity**
All promotional materials are truthful, easy to understand, and devoid of misleading or coercive language.
- **Prohibition of Targeting Vulnerable Individuals**
Marketing is not directed at minors, self-excluded persons, or individuals exhibiting problematic gambling behavior.
- **No Financial Misrepresentation**
We do not portray gambling as a solution to financial hardship, a source of income, or a method of recovering losses.
- **Accurate Game Descriptions**
Promotions do not imply that games of chance are influenced by skill or player

strategies unless skill genuinely plays a role in the outcome.

- **Avoidance of Emotional Exploitation**

Gambling is not marketed as a remedy for stress, social isolation, or emotional distress.

- **Child-Protective Standards**

Marketing content does not include imagery or language that could appeal to minors, such as cartoon graphics or themes associated with youth culture.

- **Influencer Compliance**

Geosix B.V. does not collaborate with public figures or influencers whose audiences include significant numbers of underage users.

- **Appropriate Messaging**

Advertising avoids suggestive, controversial, or offensive content, as well as associations with risky behavior such as excessive alcohol or substance use.

Transparent Promotion of Bonuses and Offers

All bonus-related content is accompanied by:

- Clear terms and conditions;
- No implication that bonuses can be used to recover financial losses;
- Full disclosure of wagering requirements, restrictions, and eligibility criteria.

Integration of Responsible Gambling Messaging

Responsible gambling information is incorporated across all communication channels, including:

- Disclaimers promoting safe play on all advertisements;
- Social media content restricted to users aged 18 and over and clearly labeled as gambling-related;
- Exclusion of self-excluded and restricted users from direct marketing campaigns (emails, SMS, push notifications);
- Offline promotional materials and sponsorships that comply fully with responsible advertising standards.

Partner Accountability

Geosix B.V. holds all affiliates and marketing partners to the same ethical standards through:

- **Binding Agreements** that require compliance with advertising codes of conduct;
- **Routine Monitoring and Audits** to ensure consistent alignment with standards;
- **Enforcement Actions**, including immediate contract termination in the event of non-compliance.

Influencers must:

- Confirm their audiences consist primarily of individuals aged 18 and over;
- Avoid any association with minors or high-risk populations;
- Promote gambling responsibly and avoid sensationalism or misleading claims.

Sponsorship and Public Visibility

All branding placements in public venues are carefully assessed and governed by the following rules:

- No brand visibility at youth-oriented events or venues;
- No sponsorships associated with events likely to attract underage audiences;
- Responsible gambling messages are embedded into all sponsored materials and communications.

Commitment to Ethical Promotion

Geosix B.V. ensures that every facet of its promotional strategy adheres to high ethical standards and the regulatory requirements set forth by the Curaçao Gaming Authority. Through careful messaging, rigorous partner oversight, and consistent transparency, we aim to protect players and uphold the principles of responsible gambling.

