

Responsible Gaming Policy

HALCYON SUPER HOLDINGS BV

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Section 1: Introduction & Policy Statement

1.1 Introduction

- (a) Halcyon Super Holdings BV, is a company incorporated with limited liability in Curacao (“Halcyon” or the “Company”). It owns and operates cloudbet.com - a gaming website offering an online sportsbook and casino where customers can place bets primarily in cryptocurrencies. Halcyon has been issued a gaming license (OGL/2024/328/0599) with the Curacao Gaming Authority (“CGA”).
- (b) Halcyon is committed to operating its business in compliance with all applicable laws, regulations and regulatory guidance. One of these legislative requirements is to have systems and controls in place to foster a safe, responsible, and transparent gaming environment, while proactively preventing harm to customers and vulnerable individuals.
- (c) The purpose of this Responsible Gaming (“RG”) Policy (this “RG Policy” or “Policy”) is to comply with these legislative requirements, while providing clear minimum standards and guidance for Halcyon and its staff to enable them to meet their personal and corporate obligations in regards to RG.
- (d) The implementation of the standards and controls as set out in the Policy is critical in ensuring that RG risks are managed effectively in compliance with legislative requirements. Failure to comply with RG legislation could result in financial penalties being levied against the Company, as well as the loss of the Company’s licence to conduct business.
- (e) The Policy applies to all activities of Halcyon, including its subsidiaries, and forms part of Halcyon’s governance framework. It is applicable to all staff of the Company, inclusive of all officers, directors, managers, administrators and support staff and is not limited to individuals working under a contract of employment but also includes temporary/contract staff and consultants.
- (f) Non-compliance with this Policy is a serious matter that may lead to disciplinary action, up to and including dismissal.

1.2 Applicable Laws, Regulation and Guidance

- (a) The Policy has been written to take into account, at a minimum, the following laws, regulations and guidelines:

- (i) National Ordinance of the 20th December 2024 Containing Rules concerning Games of Chance (“National Ordinance on Games of Chance” or “LOK”)
 - (1) Primary legislation governing Curacao’s regulation on games of chance, including the online gaming sector.
- (ii) Responsible Gaming Policy for Licensed Operators
 - (1) Primary regulation and guidelines covering Responsible Gaming issued by the CGA.
 - (2) The CGA’s Responsible Gaming Policy for Licensed Operators has a staggered implementation schedule, which is outlined in Section 4 of the CGA’s Policy. The Company will implement the requirements per this implementation schedule set out by the CGA.

1.3 What is Responsible Gaming?

- (a) RG refers to the set of principles, policies, and practices designed to ensure that gambling remains a safe, enjoyable, and controlled form of entertainment. It aims to protect customers from gambling-related harm, prevent underage gambling, and promote ethical and socially responsible behavior by gaming operators and their customers.

1.4 Policy Statement

- (a) The Company integrates RG principles into its business to ensure that gambling remains an enjoyable form of entertainment rather than a source of harm.
- (b) The Policy includes proactive steps and processes to protect vulnerable persons, promote responsible gambling along with mitigation/prevention of problem gambling behaviour. This includes establishing the following:
 - (i) A clear RG policy that is easily available to customers;
 - (ii) RG tools and information resources that are easily available to customers;
 - (iii) Monitoring mechanisms to detect and address problematic gambling behaviour; and
 - (iv) Procedures that comply with all regulatory reporting and auditing obligations.
- (c) As a general principle, the Company does not offer credit to customers for the purpose of wagering.

- (d) Where there are higher levels of risk in the Company's business model, the Company will implement enhanced responsible gambling measures that suitably accommodates the heightened risks.

1.5 Appointment of Responsible Gaming Officer

- (a) The Company has appointed the Compliance Officer ("CO") (or his Responsible Gaming Officer ("RGO") delegate) to oversee RG related endeavours within the Company.

1.6 Breaches and Exception Handling

- (a) Any breaches of this Policy must be reported as soon as possible to the CO (or his RGO delegate). The CO (or his RGO delegate) will be responsible for notifying senior management, as well as any regulatory reporting or mitigation plans resulting from the breach.
- (b) Applications for exceptional handling regarding this Policy may be made to the CO (or his RGO delegate). Applications must be made in writing and outline the proposed approach, including any risk mitigation. As a general rule, such applications will only be approved in rare circumstances, where there is no resulting breach of local regulatory requirements and risk mitigation is in place.

1.7 Administration

- (a) This Policy is owned by the CO and will be reviewed at least annually or more frequently when there are significant regulatory or business changes that materially impact the Company.
- (b) The CO (or his RGO delegate) provides a report to the Company's senior management at least annually as to the effectiveness of the Policy and related operational procedures. The report provides recommendations to management as to any proposed operational or policy enhancements.
- (c) This Policy must be reviewed and approved by senior management and the Board prior to implementation. Once approved, it is uploaded to the CGA portal for CGA evaluation.
- (d) All subsequent material amendments to this Policy will similarly require senior management and the Board's review and approval. Any material amendments to the RG Policy will also be reported to the CGA.

- (e) This Policy is effective as of the date set forth in this document¹.
- (f) This Policy has been communicated to all relevant employees and all questions regarding this Policy should be directed at the CO (or his RGO delegate), who can be contacted at compliance@cloudbet.com.

¹ The roll out of the requirements detailed within Halcyon's RG Policy, will be in accordance with the timelines set forth within Section 4 of the CGA's Responsible Gaming Policy for Licensed Operators.

Section 2: Roles and Responsibilities

2.1 The Board of Directors

- (a) The ultimate responsibility for ensuring the Company's policies, procedures and controls, in regards to RG, are appropriately designed and implemented remains with the Company and the Board of Directors ("Board").
- (b) The Board has primary responsibility for the following:
 - (i) Ensuring the Company has an effective RG program and oversight framework that is reasonably designed to ensure compliance with applicable laws and regulations;
 - (ii) Establishing and approving the RG program, including establishing clear policies regarding management of key RG risks;
 - (iii) Approving the RG Policy and subsequently approving any material amendments made to the RG Policy, as well as reviewing and approving annual RG reports submitted by the CO (or his RGO delegate);
 - (iv) Overseeing the structure and management of the compliance operations; and
 - (v) Setting the culture of compliance for the Company.

2.2 The Senior Management

- (a) The senior management is responsible for the implementation of this Policy. In particular, senior management has responsibility for the following:
 - (i) Ensuring the Company's compliance with relevant RG laws and regulations, including ensuring that this Policy is reviewed on an annual basis and any material changes are reported to the Board for approval;
 - (ii) Identifying, assessing and effectively mitigating RG risks associated with the Company's customers, products, services and transactions;
 - (iii) Promoting and enforcing high standards of integrity;
 - (iv) Ensuring that all employees are adequately trained, so that they understand relevant compliance standards and adhere to them;
 - (v) Ensuring that relevant appropriate RG controls and monitoring procedures are in place;
 - (vi) Establishing mechanisms for appropriate escalation of RG issues;
 - (vii) Reacting promptly and effectively to any compliance issues that arise;

- (viii) Ensuring adequate resources across the Company are devoted to monitor the RG program and implement appropriate procedures and controls, in particular, that the appointed CO (and his RGO delegate) are not obstructed in the execution of their duties;
- (ix) Providing the Board with periodic reporting on the RG program, to keep them up to date and abreast of the current risks and strength of the implemented controls.

2.3 The Compliance Officer (or his Responsible Gaming Officer Delegate)

- (a) The Company has appointed a CO, who will be responsible for the oversight of all activities relating to RG and providing support and guidance to the Board and senior management to ensure that RG risks are adequately managed, in particular, the CO (or his RGO delegate) has responsibility for the following:
 - (i) Overseeing the design and implementation of an effective RG program;
 - (ii) Developing and monitoring the RG program to ensure it remains up-to-date and meets current applicable laws and regulations;
 - (iii) Overseeing all aspects of the Company's RG program, including monitoring effectiveness and enhancing the controls and standards where necessary;
 - (iv) Reporting on the operational effectiveness of the RG program to senior management and the Board, as well as to make suggestions for improvements where appropriate on an at least annual basis;
 - (v) Supporting and advising all business units in the implementation of this Policy;
 - (vi) Drafting and maintaining the Company's RG related policies and procedures in line with applicable regulatory requirements and industry best practices;
 - (vii) Overseeing the standards applied for age verification, information accessibility, player self-assessments, behaviour tracking, cooling-off periods, self-exclusion, deposit limits, consumer advertising and marketing, training of employees and enhanced RG measures;
 - (viii) Reviewing internal escalations regarding RG related issues and determining any next steps, including whether to directly interact with the customer or proactively limit/exclude customer accounts;
 - (ix) Maintaining all records relating to such RG related internal reviews;
 - (x) Providing guidance to employees on how to deal with any RG related issues;

- (xi) Acting as the main point of contact with relevant authorities and law enforcement in relation to RG concerns;
- (xii) Monitoring and responding to legal and regulatory developments in relation to RG;
- (xiii) Responding to queries and information requests regarding RG related issues/concerns from applicable regulatory authorities;
- (xiv) Planning, conducting and monitoring the internal training on RG; and
- (xv) Overseeing the Company's record keeping processes as they relate to RG.

2.4 All Employees

- (a) All employees, particularly those in customer-facing roles (e.g. customer support representatives, VIP managers and marketing staff) have a responsibility as part of their duties to do the following:
 - (i) Acknowledging that failure to comply with this Policy can result in regulatory or legal measures against the Company and its employees and, in addition, internal sanctions may be imposed for any breaches;
 - (ii) Familiarizing themselves with this Policy and other policy and procedures under the RG program and comply with them at all times;
 - (iii) Understanding the RG policies and procedures that are applicable to their business unit and applying them to their processes;
 - (iv) Participating in any RG training provided by the Company; and
 - (v) Reporting any actual or suspected breaches of, or attempts to bypass, the RG Policy to the CO (or his RGO delegate).
- (b) Customer-facing employees (e.g. customer support representatives, VIP managers and marketing staff) also have responsibility to do the following:
 - (i) Identifying and reporting signs of problematic gambling behaviours to the CO (or his RGO delegate);
 - (ii) Handling interactions with at-risk customers sensitively and professionally, including providing customers with information about RG tools/external support resources and assisting players in activating tools such as self-exclusion or deposit limits without judgement or delay; and
 - (iii) Ensuring all marketing materials comply with the RG principles, especially in regards to avoiding targeting minors, or vulnerable individuals, and including clear RG messaging in all promotional content.

Section 3: Age Verification

3.1 Introduction

- (a) Under Curacao Gaming Laws, it is prohibited for the Company to allow any person under the age of 18 (a “Minor”) to gamble on the Platform. Therefore, the Company has implemented an age verification process to ensure all customers are of legal gambling age.

3.2 Age Verification

- (a) At registration, the Company verifies that customers are not minors through a self-attestation. The self-attestation requires customers to enter their date of birth and confirm they are over 18 by selecting a designated checkbox.
- (b) Additional age verification checks are conducted as part of the Company’s know your customer (“KYC”) and customer due diligence (“CDD”) processes (further details can be found in Halcyon’s Anti-Money Laundering, Counter-Terrorist Financing and Sanctions Policy).
- (c) Where the Company becomes aware that a customer is a minor, the account will be closed immediately.
 - (i) The Company will clearly communicate the reason for the account closure to the customer.
 - (ii) The Company will generally refund all deposits made by the customer and reserves the right to forfeit any winnings.
- (d) The Company maintains records of all age verification processes and their outcomes for at least 5 years. These records will be made available to the CGA if requested.

Section 4: Information Accessibility

4.1 Introduction

- (a) The Company is required to have a distinct RG Section on the Platform that is clearly visible and available for customers to access.
- (b) The Company has published an RG Section on the Platform that, at a minimum, has the following characteristics:
 - (i) It's clearly identifiable and accessible to customers;
 - (ii) It's easily understandable in order for customers to make informed decisions;
 - (iii) It includes direct accessibility for customers to access all relevant tools a customer may use to manage their gaming behaviour, including, but not limited to, self-exclusion, cooling-off periods, limit setting and other RG measures set out in this Policy;
 - (iv) It displays information about how customers may contact the Company regarding RG concerns via email or chat; and
 - (v) It is made available in English and the language of the target market (the English version takes precedence if there are any discrepancies).

4.2 Homepage Accessibility

- (a) The Company ensures that the website homepage has a clear and visible link to the RG Section.
- (b) It also ensures that the website homepage contains clear information about how customers may contact the Company regarding any RG concerns via email or chat.

4.3 Inclusion of RG Clauses in Terms & Conditions

- (a) The Company ensures that the RG Section is explicitly referenced and included within the Terms & Conditions ("T&C") of the Platform. The T&Cs also informs customers about the RG tools available to them, as well as their functionality.
- (b) The Company also ensures that the T&Cs are no more than one click away from the homepage of the website.

4.4 Footer Information Requirements

(a) The Company ensures that the footer of the website homepage contains the following essential details:

- (i) A clear visual indication that under-age gambling is prohibited;
- (ii) The name and registered address of the Company;
- (iii) The official license number issued by the CGA;
- (iv) A statement confirming the regulatory oversight of the Company's operations by the CGA;
- (v) A link to the RG Section of the Platform;
- (vi) The Company's CGA digital seal;
- (vii) A direct link to one (or more) gambling addiction support resources such as Gamcare, Gamblers Anonymous, Gambleaware.

(1) In addition to international support resources - information and links to local support sites (where available in the target market) may also be provided.

Section 5: Customer Self-Assessments

5.1 Customer Record Access

- (a) The Company is required to allow customers to be able to access a detailed record of their betting and wagering history, including timestamps of transactions from their account of at least the last 6 months. Therefore, the Company ensures that customers are able to access this data easily through the website.
- (b) In instances where customers request for longer periods of transaction data, the Company will provide these to customers within 10 working days.
 - (i) In rare circumstances where this is not reasonably achievable, the Company will notify the CGA who may grant an extension if deemed appropriate.

5.2 Self-Assessments

- (a) The Company encourages customers to regularly assess their gaming habits to determine whether their gambling remains within healthy limits by providing customers with self-assessment tools. These tools allow customers to answer a series of questions designed to help identify potential problem gambling behaviours.
- (b) The Company makes available for customers the 20-question quiz from Gamblers Anonymous (<https://gamblersanonymous.org/20-questions/>).
- (c) Additionally, the Company may provide customers with an adapted CAGE Questionnaire, where customers are encouraged to answer the following questions honestly:
 - (i) C - Cut Down: Have you ever felt you should cut down on your gambling?
 - (ii) A - Annoyed: Have people annoyed you by criticizing your gambling habits?
 - (iii) G - Guilty: Have you ever felt guilty about your gambling?
 - (iv) E - Eye-Opener: Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the results: 0 yes answer = low risk for gambling problems / 1 yes answer = moderate risk, further assessment may be needed / 2 or more yes answers = high risk, further evaluation and intervention are strongly recommended.

- (d) Where a self-assessment identifies a high risk for problematic gambling behaviours, the Company will recommend the customer to explore the available responsible gambling tools.

Section 6: Behaviour Tracking

6.1 Introduction

- (a) Curacao law prohibits licensed operators from giving a person who can reasonably be assumed to be a vulnerable person the opportunity to play games of chance.
- (b) Active monitoring can be used to help detect signs of problematic gambling and provides clear intervention strategies for high-risk customers in order to mitigate harm. By holistically analysing the customer and their relationship with the Company, the Company can identify at-risk individuals and take proactive measures to prevent gambling-related harm.
- (c) Key monitoring factors are outlined in section 8.1 below, however, it is recognised that any single/individual factor shall not necessarily, by itself, classify a customer as a potential gambling addict. A determination of problematic gambling behaviour may require the presence of multiple indicators occurring simultaneously and consistently.
- (d) Behaviour tracking is undertaken by frontline staff (i.e. customer service and VIP managers), as they are in the best position to identify problematic behaviours through patterns and direct interactions. Any potentially vulnerable gamblers are escalated to the CO (or his RGO delegate) for review and assessment.
- (e) In addition to using frontline staff, the Company also utilises automated alerting tools to systematically flag potentially vulnerable gamblers. Alerts are reviewed and assessed by the CO (or his RGO delegate).

6.2 Key Monitoring Factors

- (a) The following is a non-exhaustive list of potential problematic behaviour patterns that the Company monitors for:
 - (i) Deposit and wagering frequency - sudden unexplained increases in wagering or gaming session patterns;
 - (ii) Repeated failed transactions due to insufficient funds;
 - (iii) Reversing withdrawals - customers cancelling withdrawal requests multiple times;
 - (iv) A pattern of inexplicable extended play sessions;
 - (v) Unreasonably increased communication with customer support - including requests for bonuses reflecting signs of agitation;

- (vi) Frequent changes to Responsible Gaming tools - such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off periods;
- (vii) Customers maxing out a credit card; and
- (viii) Attempts to open multiple accounts to bypass deposit or loss limits.

Section 7: Cooling-Off and Self-Exclusion

7.1 Introduction

(a) The Company is required to implement and maintain effective processes and tools that empower the customer to manage their own gambling behaviour. Two key mechanisms that are required to be made available to customers at all times via the RG Section of the website are:

- (i) Cooling-Off: A short-term, temporary restriction from gambling activities, which the customer can customize.
- (ii) Self-Exclusion: A long-term, irrevocable exclusion from all gambling activities under the Company's licence.

Customers must not be guided or influenced toward one option over another. No interference, bonuses or reassurances may be provided.

(b) The Company ensures that customers are clearly informed of the differences between the two options and offers the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable.

7.2 Cooling-Off vs. Self-Exclusion

(a) The table below highlights the high-level differences between Cooling-Off and Self-Exclusion:

	Cooling-Off	Self-Exclusion
Wagering Prohibited	No wagering, all verticals blocked	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Generally Yes, but it depends on civil law
Log-in	Yes	No (other than for permissible withdrawals)
Brands	The Company only has the Cloudbet Brand under the Curacao License	The Company only has the Cloudbet Brand under the Curacao License
Duration	Min 24 hours	Min 1 year

Changes	Can be made more restrictive	None
Antepost Bets	Remain	Refunded/cancelled
Marketing Messages	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by the customer on the website. Very limited intervention by the Company in this process. In exceptional cases, the customer may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by the customer on the website. Very limited intervention by the Company in this process. In exceptional cases, the customer may request via email or chat and elected option must be enabled within 24 hours.
Reactivation	Automatic	Customer initiated

7.3 Cooling-Off

- (a) The Company offers customers the option to activate a cooling-off period, during which they are temporarily restricted from gambling. The customer options include:
- (i) Duration
 - (1) 24 hours
 - (2) 7 days
 - (3) 1 month
 - (4) 3 months
 - (ii) Marketing Opt-Out
 - (1) Opt-out
- (b) The customer is given the option to select their preference by tick-box in each of the above categories. Tick-boxes are not pre-checked.
- (i) In exceptional cases, the customer may request cooling-off via email or chat and the Company will enable the cooling-off within 24 hours.
- (c) The cooling-off period will cover all gambling activities, with customers not given the options to just cool-off from certain verticals.
- (d) The Company incorporates a verification check for the elected periods of 1 or 3 months, which asks the customer to confirm the decision to take a break from gambling during the selected cool-off period. This check is online only and is neutrally expressed as “You wish to cool off for one month. Please confirm.”.

- (e) Once confirmed, the restrictions take effect immediately and are enforced based on the customers' selections.
- (f) The Company does not:
 - (i) Question the customers' decision;
 - (ii) Offer bonuses or promotions to encourage the customer to continue playing; and
 - (iii) Delay or complicate the activation process.
- (g) The Company ensures that customer funds remain accessible for withdrawal and the account remains active but with gambling features disabled.
- (h) The Company will not offer any bonuses, free play, or incentives during the cooling-off period. Where customers have opted-out of marketing, the Company will not send any marketing materials to them during their Cooling-off period.
- (i) Accounts are automatically reactivated after the selected cooling-off period expires and no further action is required by the Customer.

7.4 Self-Exclusion

- (a) The Company offers customers the option to self-exclude from all gambling activity. The customer options include:
 - (i) Duration
 - (1) 1 year
 - (2) 3 years
 - (3) 5 years
 - (4) Lifetime
- (b) The customer is given the option to select their preference by tick-box as to the duration of the self-exclusion period, all other elements are automatic and include the following:
 - (i) Vertical - All gambling activity.
 - (ii) Marketing - Automatic opt-out.
- (c) The self-exclusion process offered by the Company has been built to allow the customer to be able to initiate and complete the self-exclusion process fully online without requiring email communication with the Company's customer support team or approval from the Company.
 - (i) In exceptional cases, the customer may request self-exclusion via email or chat and the Company will enable the self-exclusion within 24 hours.
- (d) The Company incorporates a verification check for self-exclusion requests, which asks the customer to confirm that they are aware they have chosen to self-exclude and

understand the consequences of this decision. This check is online only, brief, straightforward, and is neutrally expressed as “You have chosen to self-exclude for 5 years. Please confirm.”.

- (e) Once confirmed, the self-exclusion takes effect immediately and is enforced according to the customers’ selections.
- (f) The Company does not:
 - (i) Question the customers’ decision;
 - (ii) Offer bonuses or promotions to encourage the customer to continue playing; and
 - (iii) Delay or complicate the activation process.
- (g) Self-exclusion will mean the following for the self-excluded customer and their account:
 - (i) Their account is closed and the customer cannot login;
 - (ii) The Company has robust measures in place to identify, where reasonably possible, any duplicate accounts that exist and prevent self-excluded individuals from creating new accounts under different credentials.
 - (iii) Ante-post bets will generally be voided and refunded, subject to Anti-Money Laundering/Counter-Financing Terrorism (“AML/CFT”) regulations and any civil law implications will also be considered.
 - (iv) The customer must complete any active gameplay that is in-running at the time of the self-exclusion.
 - (v) Contributions to progressive jackpots that were made by the customer through gameplay prior to the self-exclusion request remain in-situ, but the customer is no longer entitled to participate in the jackpot after the self-exclusion is in effect.
- (h) The Company will not send any direct marketing or advertising to the customer during the self-exclusion period.
- (i) After the self-exclusion period ends, the customer must request in writing (by email or chat) the unblocking of the account. The written request can be prompted at the point of the customer attempting to log in after the exclusion period has ended or by unprompted written communication by the customer via the official customer support channels.
 - (i) The Company will not instigate reactivation through re-commencing communications with the customer.
- (j) Activation of a self-exclusion by a customer is irreversible and irrevocable for the duration of the exclusion period selected.
- (k) The Company retains records of self-excluded customers in accordance with applicable retention periods.

- (l) Additionally, where reasonably practicable, and in line with surrounding regulations, any payment method, known directly by the Company, used by a self-excluded customer is blocked for future use during the exclusion period to prevent circumvention of restrictions.

7.5 Halcyon-Initiated Exclusion

- (a) The Company may exclude a customer as a high-risk intervention measure if:
 - (i) The customer displays problematic gambling behaviour; or
 - (ii) The customer attempts, or engages in, criminal activities through the Company's Platform.
- (b) The Company will not exclude customers solely on the basis of the amount of their winnings.
- (c) Exclusions initiated by the Company are formally documented, and records are kept for at least 5 years. The records will be provided to the CGA if requested.

Section 8: Deposit Limits

8.1 Introduction

- (a) The Company is required to offer their customers' tools to control their gambling activity, which includes giving them the ability to set deposit limits. Customers should be allowed to set these limits for daily, weekly, or monthly periods, which allows them to tailor restrictions to their individual gaming habits.

8.2 Deposit Limits

- (a) The Company allows customers to set limits on the total amount that can be credited to their account over the following time periods:
 - (i) Daily;
 - (ii) Weekly; or
 - (iii) Monthly
- (b) The Company's deposit limit tool has the following features:
 - (i) Once a deposit limit is reached, additional funds will not be credited to the customers' account until the specified time period resets.
 - (1) Crypto deposits cannot be rejected once a customer knows their deposit address. In instances where a crypto deposit breaches the deposit limit set by the customer, the Company will not credit the customer's account with the funds that breach the limit. The customer will be given the option to withdraw these excess deposits or wait to have them credited once the deposit limit period resets.
 - (ii) Where a customer wants to change their deposit limits - any request to increase the severity of a deposit limit will take effect immediately, while requests to decrease the severity of the limit are subject to a 24-hour waiting period before taking effect.
 - (iii) Any resolved or unresolved wagers made prior to the deposit limit being set, will remain unaffected.

Section 9: Consumer Advertising and Marketing

- (a) The Company does not engage in irresponsible advertising.
- (b) The Company follows the following principles in regards to its consumer advertising and marketing campaigns:
 - (i) No targeting of vulnerable groups - marketing, including visual content, must not directly target vulnerable persons.
 - (ii) No portrayal of gambling as an investment - advertising must not promote gambling as a way to achieve financial success or solve financial difficulties.
 - (iii) No misrepresentation of skill vs. chance - marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
 - (iv) No emotional manipulation - advertising must not portray gambling as a substitute for financial, emotional, or mental well-being.
 - (v) Marketing materials must not feature minors or depict them engaging with gambling content.
 - (vi) No explicit content - adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
 - (vii) No encouragement of unrelated harmful behaviours - there must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.
 - (viii) Bonus conditions:
 - (1) Bonuses and promotions must be communicated transparently with clear terms and conditions.
 - (2) The Company must not use bonuses to encourage excessive gambling.
 - (ix) Third party involvement:
 - (1) The Company is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors, social media influencers, including wordings and visual representations, where the influencers actions and/or statements are paid placement or advertisement.
 - (2) The Company must make any contracted third-party aware of their RG Policy and require them to adhere to it.
 - (x) Responsible gaming messaging - all advertising must include a clearly visible responsible gaming message or slogan.

Section 10: Enhanced Responsible Gaming Measures

10.1 Introduction

- (a) Where higher levels of risk are noted by the Company, either due to a higher inherent level of risk in the business model or with a specific customers' actions, the Company may decide to implement enhanced RG measures.

10.2 Internet Filtering Tools

- (a) To help prevent underage gambling, the Company reminds customers through the RG Section of the Platform that they should take precautions when sharing devices with minors - such as safeguarding usernames, passwords and payment details.
- (b) Additionally, the Company has links within the RG Section of the Platform that can help restrict access to gambling websites. Examples of third-party tools that are available for website and gambling site blocking are found below:
 - (i) BetBlocker - betblocker.org
 - (ii) GamBlock - gamblock.com
 - (iii) Gamban - gamban.com

10.3 Direct Customer Interaction

- (a) The Company may employ automatic or manual pop-up notifications in response to concerning behaviours. These notifications include a link for the customer to contact a trained RG professional.
- (b) Where a customer exhibits behaviour that reasonably suggests they may be a vulnerable person, the Company will initiate direct contact. This communication advises the customer to review the RG Section of the Platform and asks them to consider using the available tools and support services.

10.4 Other Limits

- (a) In higher risk circumstances, the Company may consider offering the customer the ability to impose other types of limits on themselves outside of deposit limits, cooling-off periods and self-exclusion tools. These other limits may include the following:

- (i) Loss limits;
- (ii) Time limits; or
- (iii) Wager limits.

(b) Exceptions to Limits and Exclusions

- (i) A limit or exclusion has the potential to affect active wagering - including, but not limited to:
 - (1) A time limit set when a customer is in active gameplay; or
 - (2) A limit or exclusion when a customer has an unresolved ante-post bet on a future event.
- (ii) Limits and exclusions are honoured immediately by the Company with the exception of active gameplay or bet(s). The restrictions apply upon completion of the active gameplay, bets or events.
- (iii) In general, at risk money counts towards customer limits - for example a customer may not place any additional bets that breach the newly set limit thresholds while an ante-post bet remains unresolved.

Section 11: Training

- (a) All the Company's employees are expected to be fully aware of the Company's RG Policy.
- (b) Every employee shall read and comply with this Policy.
- (c) The Company ensures that its employees receive mandatory training at regular intervals.
- (d) All training records and attendance lists shall be documented and kept for not less than 5 years for audit purposes.
- (e) The training includes but is not limited to:
 - (i) Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation);
 - (ii) Conducting sensitive and structured conversations with at-risk customers (including how to handle customer interactions professionally and effectively); and
 - (iii) Directing customers to appropriate support resources and RG tools.
- (f) All new hires will be provided access to the Company's RG Policy as part of the new employee orientation, along with the required new joiner training.
- (g) In addition to the general training for all employees, more targeted and tailored training will be given to employees depending on their job roles.

Section 12: Management Information and Reporting

- (a) The CO (or his RGO delegate) ensures that the Company has appropriate internal management information that allows them to assess and monitor the effectiveness of the RG controls in place and that appropriate reporting about the RG program is provided to:
 - (i) Senior management and the Board (on a periodic basis to allow them to understand and assess the status of the RG program); and
 - (ii) External Authorities (as per reporting requirements and other situations as appropriate).

Section 13: QA and Compliance Testing

- (a) The CO (or his RGO delegate) undertake:
 - (i) Regular spot checks of RG related controls and procedures to ensure compliance with RG policy requirements, and maintain records of such checks; and
 - (ii) An annual review in relation to the effectiveness of the RG program and provide a report to senior management and the Board.
- (b) The results of the annual review, amongst other things, will inform the CO (or his RGO delegate) whether any additional QA or Compliance Testing needs to be conducted on specific areas of the RG program.

Appendix 1: Definitions

(a) The following terms shall have the following meaning:

- (i) “AML” means Anti-Money Laundering;
- (ii) “CDD” means Customer Due Diligence;
- (iii) “CFT” means Counter-Financing Terrorism;
- (iv) “CGA” means Curacao Gaming Authority;
- (v) “CO” means Compliance Officer;
- (vi) “Cooling Off” means a pre-determined period that can comprise hours, days or months which is set by the customer during which time the customer may not place any wagers whatsoever;
- (vii) “Games of Chance” means any game in which one or more customers, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players’ insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker;
- (viii) “Halcyon” or the “Company” means Halcyon Super Holdings BV;
- (ix) “KYC” means know your customer;
- (x) “LOK” is the National Ordinance on Games of Chance law of Curacao;
- (xi) “Marketing, Promotion and Advertising” refers to all resources, messages and media that promote the operator’s domain(s), brand(s), products or services. This includes but is not limited to print and other media advertising, content marketing, digital marketing, and social media campaigns;
- (xii) “Mandatory Requirements” are the basic elements of a RG Policy that must be implemented by all operators. These elements must reflect the target markets and customers of the operator;
- (xiii) “Minor” means any person under the age of 18;
- (xiv) “Operator” is a holder of a B2C license from the Curacao Gaming Authority (or holder of an Orange Digital Seal “Certificate of Operations”);
- (xv) “RG” means responsible gaming;
- (xvi) “RGO” means responsible gaming officer;
- (xvii) “Self-Exclusion” is an event where a customer voluntarily bars themselves from all or certain online gaming-related activities with a specific operator; and

(xviii) “Vulnerable Person” is defined in Curacao Law as:

- (1) Under 18 years of age;
- (2) Has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people;
- (3) Has been banned from playing any Game of Chance either by force or at his or her own request; or
- (4) Has been declared bankrupt.

Halcyon_Responsible_Gaming_Policy_v1.0 (Final)

Final Audit Report

2025-06-04

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