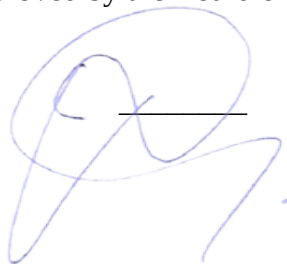


RESPONSIBLE GAMING POLICY

Prevailer B.V

Approved by the Board of Directors

A handwritten signature in blue ink, consisting of a large, stylized 'P' followed by a series of loops and a final flourish, is written over a solid black horizontal line.

31.03.2025

I. Terminology

Games of Chance

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

LOK (National Ordinance on Games of Chance)

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

Marketing, Advertising & Promotional Activities

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

Mandatory Elements

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

Licensed Operator

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

Self-Exclusion

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

Vulnerable Individuals

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

Is under 18 years of age;

Shows an inability to regulate their gambling behavior, with a potential or existing risk of addiction and harm to themselves or others;

- Has been legally or voluntarily barred from gambling;
- Has been declared insolvent or bankrupt.

II. Introduction

At Prevailer B.V. (the Company) we are fully committed to upholding the principles of Responsible Gaming as outlined by the Curaçao Gaming Control Board (GCB). Prevailer B.V. (Company registration number 149548) with registration address: 17, Chuchubiweg, Willemstad, Curacao, we recognize our responsibility to foster a safe, transparent, and fair gaming environment where players can enjoy gambling as a form of entertainment while minimizing potential risks.

In compliance with the Curaçao Gaming Control Board's (GCB) regulatory framework, we have developed and implemented a Responsible Gaming Policy that aligns with industry best practices and the specific needs of our target markets. Our policy includes measures to prevent problem gambling, protect vulnerable players, and ensure responsible gaming behaviour across our platform.

By integrating Responsible Gaming principles into our operations, we aim to:

- Promote safe and controlled gaming
- Experiences for all players.
- Prevent underage gambling and ensure compliance with age restrictions.
- Provide tools and resources to help players manage their gambling behaviour.
- Support initiatives that address problem gambling and player well-being.

We value our players and hope that you enjoy our products responsibly, and that gambling continues to be fun and entertaining. It is our mission to provide our players with the most entertaining gambling experience and it is our duty to help prevent compulsive use of and underage access to our gaming products. As a responsible, licensed gaming company, we have implemented a number of company policies and tools to promote responsible gambling.

Our objective is to ensure that our players enjoy our services in a safe, secure and supportive manner.

III. Player Protection Measures and Regulatory Compliance

As a licensed casino operator, we are committed to ensuring that players have access to clear, transparent, and accessible information that allows them to make informed decisions about their gaming activities. In compliance with the regulatory requirements set by the Curaçao Gaming Control Board' (GCB), we provide comprehensive Responsible Gaming measures throughout our website and application interface.

Our Responsible Gaming Policy is prominently displayed on our homepage and is easily accessible from all relevant sections of our platform. This policy is available in English as well as the languages of our target markets, ensuring that all players can fully understand their rights and the available responsible gaming resources.

We offer direct access to player protection tools that enable players to manage their gaming behaviour effectively: These tools include:

- **self-exclusion options**

Self-exclusion is a decision taken by the player in strict exercise of his self-control and will power. It is intended as a tool for making conscious and informed decisions regarding gaming and, therefore, it is the player's own responsibility to fulfil it, without prejudice to the actions that the Operator may take with respect to excluded players to ensure compliance with the self-exclusion decision.

- **cooling-off periods**

A cooling-off period in gambling is a temporary self-exclusion tool that allows players to take a break from gambling for a specific period of time. It is designed to help individuals regain control over their gambling habits and prevent impulsive behaviour.

During a cooling-off period, the player cannot deposit, place bets, or access gambling services on the platform. Unlike permanent self-exclusion, a cooling-off period is temporary and typically lasts from 24 hours to several months, depending on the platform's responsible gaming policies.

- **deposit limits**

Players have the option to set a cap on the total amount they can deposit within a specified timeframe, such as daily, weekly, or monthly.

Once the set deposit limit is reached, the player will be restricted from making additional deposits until the limit resets for the next period.

Furthermore, we provide direct links to reputable gambling addiction support organizations that provide free, confidential support and resources for individuals struggling with problem gambling.

Through these comprehensive measures, we strive to create a safe, transparent, and responsible gaming environment where gambling remains an enjoyable form of entertainment while minimizing potential risks associated with problem gambling.

● Age Verification

To prevent underage gambling, we enforce a strict age verification process:

- Players must confirm they are 18 or older before depositing or playing.
- Age verification is conducted via Date of Birth confirmation, an "I am over 18" checkbox, and payment method verification.
- Government-issued IDs (passport, national ID, or driver's license) must be provided as part of the Know Your Customer (KYC) process.
- If a player is found to be underage, their account will be closed, deposits will be refunded (except in cases of AML holds), and any winnings will be forfeited.
- Records of all verification attempts are maintained for regulatory review. Parental

Control and Internet Filtering

To prevent underage access, we encourage adults to safeguard usernames, passwords, and payment details. We also recommend third-party parental control software such as:

- **Net Nanny** (www.netnanny.com)
- **GamBlock** (www.gamblock.com)
- **CyberSitter** (www.cybersitter.com)

● Self-Assessment Tools

Players can access their betting history and transaction records to assess their gambling behaviour. We provide self-assessment tools like acknowledged quizzes and questionnaires.

IV. Behaviour Tracking & Intervention

Employees of the company are responsible for monitoring player behaviour to identify potential issues through patterns and direct interactions. When at-risk behaviour is detected, trained responsible gaming professionals reach out to the players, offering options like deposit limits, cooling-off, and self-exclusion. In severe cases, mandatory account restrictions or self-exclusion may be enforced. The company also employs trained staff and technological tools, including gaming platform features, in-game tools, artificial intelligence (AI), and machine learning (ML), to enhance monitoring efforts.

Key monitoring factors

Deposit and wagering patterns: monitoring sudden spikes or unusual trends in deposit amounts, betting behavior, or gaming frequency.

Use of multiple payment methods: flagging instances where players utilize several payment options, particularly if it appears to circumvent deposit limits.

Withdrawal reversals: identifying players who frequently cancel or reverse withdrawal requests.

Prolonged gaming sessions: tracking extended periods of uninterrupted gameplay.

Increased customer support interactions: observing repeated contact with support teams, especially involving bonus requests or signs of distress.

Frequent adjustments to responsible gaming tools: noting repeated changes to deposit limits or the recurring use of features like cooling-off periods.

High spending among young players: monitoring players under 25 who exhibit significant spending, especially within casino or virtual gaming environments.

Exceeding credit card limits: detecting users who max out credit cards and attempt to add additional ones.

Inconsistent spending behavior: identifying spending patterns that appear disproportionate to the player's expected financial profile.

Multiple account attempts: flagging efforts to create additional accounts, potentially to bypass imposed limits or restrictions.

Procedures for Player Identification and Intervention

Prevailer B.V has a structured approach to addressing problem gambling behaviour:

Risk Assessment of Players Profile

- Establishing player profiles with relevant data to assess individual risk levels.
- Continuously monitoring behavioural risk factors with real-time alerts for activities concerning.

Direct Player Interaction:

- Initiating contact with players exhibiting concerning behaviour through trained responsible gaming professionals.
- Documenting interactions, indicators of concern, and actions taken within the Player Account Management system.

Interventions of Responsible Gaming:

- Informing at-risk players about tools like deposit limits, time-outs, and self-exclusion.
- Following clear guidelines for escalating concerns, which may involve applying deposit limits, temporarily suspending access pending further review, or excluding the player in cases of extreme risk.

Staff Training

The company ensures that customer service and responsible gaming staff are trained to:

- **Recognize signs of gambling distress**, identify indicators such as agitation, aggression, financial desperation, preoccupation with gambling, and significant increases in gambling frequency or stakes
- **Conduct sensitive and structured conversations with at-risk players.** Engage with at-risk players empathetically, utilizing effective communication techniques to discuss their gambling behaviours and offer support.
- **Direct players to appropriate support resources and responsible gaming tools.** Inform players about available resources, including self-exclusion programs, deposit limits, time-outs, and external support services like counselling and helplines.
- **Document all interactions for compliance and follow-up actions.** Maintain detailed records of all interactions with players concerning responsible gaming to ensure compliance with regulatory requirements and facilitate appropriate follow-up actions.

Training is conducted at least annually and more frequently if necessary. The training program is regularly updated to incorporate the latest best practices and feedback from internal and external stakeholders. Effectiveness is evaluated through formal mechanisms, such as pre- and post-training assessments, to ensure staff are well-prepared to support responsible gaming initiatives.

Escalation and Oversight for Critical Cases

When problematic gambling behaviours are identified, they are promptly escalated to the

Compliance Officer or Responsible Gaming Officer. These officers conduct a comprehensive assessment of each case to determine the most appropriate interventions, which may include:

1. **Implementing Further Restrictions:** This may involve setting stricter deposit or wagering limits, adjusting time constraints, or modifying access to certain gambling products to help the individual regain control over their gambling activities.
2. **Facilitating Self-Exclusion:** Providing support and guidance to individuals who choose to voluntarily exclude themselves from gambling activities for a specified period, aiding in their commitment to responsible gaming practices.
3. **Enforcing Mandatory Exclusion:** In cases where voluntary measures are insufficient, the officer may impose mandatory exclusion from gambling activities to protect the individual from further harm.
4. **Providing Information on Support Services:** Offering details about available counselling and support services, such as helplines and treatment programs, to assist individuals in addressing their gambling behaviours.
5. **Monitoring and Follow-Up:** Establishing ongoing monitoring and follow-up procedures to ensure the effectiveness of the interventions and to provide additional support as needed.

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

V. Cooling-Off Period

As an operator committed to responsible gaming, we ensure that the cooling-off period is easily accessible, immediate, and free from interference. If technical or platform modifications are required to implement this feature, we will provide this service manually until a technological solution is fully integrated.

Availability and Accessibility

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

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

Immediate Activation and Restrictions

Upon a player's selection of the cooling-off option, the following measures are implemented to promote responsible gambling:

- **Clarification of Options:** Players are informed about the distinctions between a cooling-off period and self-exclusion, allowing them to make an informed choice. They may opt for self-exclusion if it better suits their needs.
- **Instant Enforcement:** The chosen restriction is applied immediately, ensuring prompt adherence to the player's decision.
- **Account Suspension:** The player's account is temporarily locked, preventing any gambling activities during the specified cooling-off period.
- **Marketing Opt-Out:** Players are provided the option to remove themselves from marketing communications throughout the duration of the cooling-off period.

To uphold ethical standards, our policy strictly prohibits any actions that may discourage players from initiating a cooling-off period, including:

- **Questioning the Player's Decision:** Respecting the autonomy of the player's choice without inquiry.
- **Offering Reassurances to Delay the Process:** Avoiding any attempts to persuade the player to reconsider or postpone their decision.
- **Providing Incentives to Continue Playing:** Refraining from offering bonuses, promotions, or similar incentives to encourage continued play.

Reactivation and Additional Time-Out Options

At the conclusion of the cooling-off period, the player's account is automatically reactivated, allowing the resumption of gaming activities without the need for further action.

VI. Permanent Self-Exclusion Options

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

Initiating Self-Exclusion: Process and Accessibility

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

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

Immediate Enforcement and Non-Reversible Effect

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

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

Self-Exclusion Duration Options

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

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

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

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

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

Account Handling and Funds During Exclusion

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

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

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

Reinstating Access Post-Exclusion

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

- Submit a written request to reactivate the account
- Receive a reminder outlining Responsible Gaming resources

- Be encouraged to complete a self-check questionnaire, such as the Gamblers Anonymous 20-Question Test

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

Restrictions on Marketing and Contact

During and after the exclusion period:

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

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

Regulatory Oversight and Documentation

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

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

Operator-Initiated Exclusion

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

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

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

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

VII. Financial Limits

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

Customizable Deposit Limit Settings

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

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

Special Cases: Ongoing Play Sessions

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

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

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

Upholding Player Safety and Regulatory Expectations

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

VIII. Game Time Awareness and Notifications

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

Continuous Session Duration Display

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

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

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

Reinforcing Responsible Gambling Habits

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

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

IX. Marketing and Advertising Ethics

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

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

Advertising Standards and Regulatory Compliance

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

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

- **Appropriate Content Only**

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

Bonus and Promotion Transparency

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

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

Responsible Gambling Messaging Across All Channels

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

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

Affiliate and Influencer Compliance

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

- **Legally Binding Contracts**, requiring full compliance with our advertising code of conduct
- **Routine Audits**, ensuring ongoing adherence to ethical and regulatory standards
- **Enforcement Actions**, including immediate contract termination for violations

Influencers must:

- Confirm that their audience is primarily 18+

- Avoid any association with minors or high-risk individuals
- Promote gambling in a factual and responsible manner—never in a sensational, misleading, or provocative way

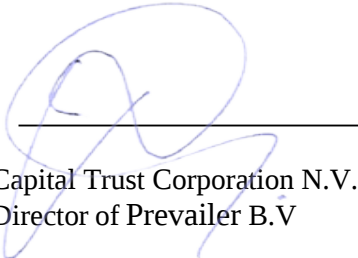
Sponsorship and Public Visibility Standards

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

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

Maintaining Integrity in Marketing

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



Capital Trust Corporation N.V.
Director of Prevailer B.V