

Responsible Gaming Policy

Effective as of September 1, 2025

Operator: Zeno Club B.V.

Registration No.: 154987

Registered address: Chuchubiweg 17, E-Commerce Park 51, Curaçao

Licence framework: National Ordinance on Games of Chance (LOK) supervised by the Curaçao Gaming Authority (CGA)

1. Purpose, legal basis, and applicability

This Policy establishes the principles, procedures, and operational controls designed to ensure that gambling remains a form of entertainment and to prevent gambling-related harm. It applies to all operations, products, brands, domains, and apps, and to all employees, contractors, and third parties involved in the provision of services.

Zeno Club B.V. commits to implementing Responsible Gaming (RG) under the requirements of the LOK and the CGA. Compliance with this Policy is treated as a condition of the licence. The Policy is uploaded to the CGA portal and published on all operator domains. No credit is provided to players for gambling purposes.

2. Definitions

- **Minor:** any person under the age of 18.
- **Vulnerable person:** includes minors and any person unable to sufficiently control gambling behavior.
- **Cooling-Off:** a temporary player-selected break period during which gambling is disabled.
- **Self-Exclusion:** a player-requested, long-term and irrevocable exclusion from all gambling activities under the operator's licence.
- **Operator:** Zeno Club B.V.

3. Governance and accountability

- **Responsible Gaming Officer (RGO):** The Board designates an RGO with day-to-day responsibility for RG. If not yet appointed, the Compliance Officer assumes this role.
- **Annual management report:** At least once every 12 months the RGO provides a written effectiveness report to senior management, including KPIs, incidents, audits, and an improvement plan.
- **Scope:** Controls are adapted to the operator's risk profile, taking into account higher-risk segments such as VIP players, affiliates, or cryptocurrency-based payments.

4. Mandatory program elements

The RG program includes: age verification, accessible information for players, self-assessment tools, behavioral tracking and interventions, cooling-off options, self-exclusion mechanisms, deposit limits, staff training, and marketing standards.

5. Prevention of underage gambling

- **Minimum age:** Gambling services are restricted to players aged 18+.
- **Verification:**
 - At registration players must provide date of birth and confirm 18+.

- o Before the first withdrawal and on risk triggers, a government-issued photo ID is mandatory. Secondary checks may include payment validation, third-party databases, or biometric verification.
- **If a minor is detected:** Account is closed immediately. Deposits are refunded, winnings forfeited, and the player is notified.
- **Recordkeeping:** All verification records are stored for audit.

6. Player information and accessibility

- **Responsible Gaming Section:** Each website and app must have a dedicated RG page, easily accessible, containing information on risks, tools, limits, breaks, and self-exclusion, with links to support contacts.
- **Homepage link:** A visible RG link is placed on the homepage and app home.
- **Terms and Conditions:** Must include clear references to RG and explain available tools.
- **Footer requirements:** Display under-18 prohibition, operator name and address, licence number, statement of CGA oversight, RG link, CGA seal, and links to problem-gambling organizations.

7. Self-assessment

Players are provided with online questionnaires and self-screening tools. Results show risk indicators and direct the player to available limits, breaks, self-exclusion, and external help. Transaction history of at least six months is available to players at any time.

8. Behaviour tracking and intervention

- **Objective:** Detect early signs of problem gambling and intervene appropriately.
- **Indicators:** Increase in deposit frequency, cancelled withdrawals, extended play sessions, chasing losses, frequent changes to limits, multiple accounts, or aggressive behavior in support contacts.
- **Process:**
 - o Profiles are monitored with risk-based approaches.
 - o All RG interactions and triggers are logged in the Player Account Management system.
 - o Escalation steps may include proactive messaging, enforced limits, temporary suspension, or permanent exclusion.
- **Restriction:** RG measures must never be used to delay or obstruct legitimate withdrawals.

9. Breaks and exclusions

9.1 Cooling-off

- **Durations:** 24 hours, 7 days, 1 month, 3 months.
- **Scope:** May apply to all games or specific verticals; to one brand or all brands.
- **Effect:** Takes effect immediately; deposits and wagers are blocked, withdrawals allowed, no bonuses or marketing during the break. Accounts reactivate automatically at the end of the period.

9.2 Self-exclusion

- **Minimum period:** At least 1 year, with options of 1, 3, 5, 10 years, or lifetime.
- **Scope:** Applies to all brands and all verticals under the licence.
- **Execution:** Immediate and irrevocable for the chosen period. Marketing is stopped. Reactivation occurs only after the period ends and at the player's explicit request.

9.3 Operator-initiated exclusion

- Applied when there is strong evidence of problem gambling or criminal activity.
- Records are documented and retained for at least 5 years.

10. Limits and other safer-gambling tools

10.1 Deposit limits

- Daily, weekly, or monthly limits must be available.
- Tightening applies immediately; loosening applies only after a 24-hour delay.

10.2 Other limits

- Loss, wager, and time-based limits may be offered, depending on player risk profile.

10.3 Reality checks

- Session timers, periodic pop-ups, or visible clocks may be implemented. Play pauses until the player acknowledges the message.

11. Training and staff readiness

- All customer-facing staff are trained regularly to recognize problem gambling indicators, hold sensitive conversations, and guide players to appropriate tools.
- Training emphasizes neutral communication, accurate documentation in the PAM, and escalation procedures.

12. Consumer advertising and marketing

Zeno Club B.V. recognizes that advertising and marketing practices carry significant responsibility in the gambling sector. All marketing, promotional, and customer acquisition activities must comply with the following principles:

12.1 Targeting and audience restrictions

- Marketing content must **never** target or appeal to minors (under 18) or vulnerable persons.
- Age-gating mechanisms (e.g., “18+ only” disclaimers, clear labelling, audience filters) must be applied across digital channels, including websites, social media, affiliates, and influencers.
- Imagery, language, and themes that may appeal primarily to children or teenagers (e.g., cartoon characters, youth culture references) are strictly prohibited.
- Marketing must not be directed at players who are self-excluded, cooling-off, or who have opted out of marketing communications.

12.2 Content standards

- Advertising must never portray gambling as:
 - A way to solve financial difficulties.
 - An investment opportunity or guaranteed source of income.
 - A method to recover previous gambling losses.
- Marketing should emphasize gambling as entertainment, not as a financial product.
- Messaging must avoid creating unrealistic expectations about chances of winning.
- All advertisements must include a **responsible gaming message** and a visible **“18+” symbol**.

12.3 Transparency and fairness

- All promotions, bonuses, and incentives must be described transparently, with clear and non-misleading terms.
- Key conditions (wagering requirements, expiry dates, withdrawal restrictions) must be displayed prominently and not hidden in fine print.

- Terms and Conditions for promotions must be accessible with a single click from the marketing material.

12.4 Responsible incentives

- Promotions, bonuses, and incentives are **prohibited** for players who are in a cooling-off period or under self-exclusion.
- No bonuses may be used to pressure players into continued play after signs of problem gambling have been identified.
- Loyalty or VIP programs must incorporate RG checks and must not encourage excessive or risky play.

12.5 Affiliate and partner obligations

- All affiliates, influencers, and external marketing partners must sign agreements that include explicit clauses on compliance with RG marketing standards.
- Operators must monitor affiliates for compliance. If violations are detected (e.g., targeting minors, misleading promotions), cooperation must be terminated immediately.
- Affiliates must also display RG messages, licence details, and age restrictions on their platforms.

12.6 Use of data in marketing

- Customer data must not be used to target or exploit players who exhibit indicators of problem gambling.
- Marketing segmentation must exclude self-excluded and cooling-off players.
- CRM systems must automatically flag restricted accounts to prevent promotional outreach.

12.7 Internal approvals and oversight

- All marketing campaigns must be reviewed and approved by the Responsible Gaming Officer or Compliance Officer prior to launch.
- High-risk promotions (large welcome bonuses, VIP campaigns) must undergo an additional RG risk assessment.
- Staff involved in marketing must be trained to understand RG obligations and the consequences of non-compliance.

12.8 Channels and placement

- Gambling ads must not appear in media or environments primarily consumed by minors (youth websites, children's TV, school-related locations).
- Digital advertising must use appropriate filters to avoid underage audiences (e.g., age targeting on social media, keyword exclusions).
- Email, SMS, and push notifications must include an easy and immediate opt-out option.

13. Enhanced measures

Zeno Club B.V. acknowledges that certain player groups or behaviors present a higher risk of gambling-related harm. In line with the LOK framework and the CGA Responsible Gaming Policy, the operator applies **enhanced measures** in addition to the standard responsible gaming tools. These measures are risk-based and proportionate to the level of concern identified.

13.1 Identification of higher-risk situations

Enhanced measures are activated when:

- Player behavior indicates sustained or escalating risk (e.g., chasing losses, excessive session duration, frequent reversal of withdrawals, multiple failed deposit attempts).
- Monitoring systems detect repeated breaches of self-imposed limits or frequent requests to loosen restrictions.
- Customer support notes signs of distress, agitation, or financial desperation.
- Players are identified as belonging to higher-risk categories (e.g., VIP/high rollers, players with rapid deposit growth, players using multiple payment methods).
- Vulnerability indicators are observed, such as references to financial hardship or mental health issues.

13.2 Strengthened communication and interventions

- **Proactive outreach:** When risk indicators are triggered, trained RG staff contact the player directly to discuss safer gambling tools and available support services.

- **Mandatory interaction:** For serious or repeated concerns, the operator requires a structured conversation before further play is allowed. This may include phone, video, or secure chat.
- **Tone and approach:** All communication must be supportive, non-judgmental, and focused on harm prevention.

13.3 Enhanced technical restrictions

- Temporary account suspension until the player engages with RG support.
- Stricter deposit or wagering limits imposed by the operator.
- Blocking of specific game verticals associated with higher risk (e.g., slots or fast-paced games).
- Longer minimum cooling-off options presented to the player.
- Operator-initiated exclusion if risks persist despite earlier interventions.

13.4 Parental and third-party tools

- The operator provides clear guidance to parents and guardians about third-party software that blocks access to gambling sites (e.g., Gamban, GamBlock, BetBlocker).
- Links to these tools are included in the Responsible Gaming section of the website and apps.

13.5 Support services and referrals

- Players identified as high-risk are referred to external organizations specializing in problem gambling support, such as GamCare, Gamblers Anonymous, or Gambling Therapy.
- Contact details of these organizations are made available prominently on the Responsible Gaming page and in direct communications with the player.

13.6 Enhanced monitoring and reporting

- All enhanced interactions and interventions are documented in the Player Account Management system with detailed notes on indicators observed and measures applied.
- Data is used for periodic reviews by the Responsible Gaming Officer to assess effectiveness and refine intervention strategies.
- Serious or repeated cases may be included in the annual RG effectiveness report to senior management.

13.7 Oversight and staff involvement

- Staff handling enhanced measures receive advanced RG training, including how to conduct sensitive conversations and apply operator-initiated restrictions.
- Marketing and VIP teams are instructed to cease all promotional activities toward players under enhanced measures.
- Compliance reviews ensure that enhanced measures are applied consistently and fairly across all brands.

14. Complaints and RG contacts

- Players may submit RG-related requests or complaints via live chat or email.
- All complaints are handled with priority, and actions taken are communicated clearly.
- **Email contact:** Support@WhiteRabbit.Casino

15. Recordkeeping and audit

Zeno Club B.V. recognizes that accurate, comprehensive, and auditable recordkeeping is fundamental to regulatory compliance and effective responsible gaming oversight. The operator maintains detailed records in secure systems and ensures they are available for internal review and external inspection by the Curaçao Gaming Authority (CGA).

15.1 Scope of records

The following categories of records must be maintained:

- **Age-verification records:** copies of identity documents, results of verification checks, secondary or enhanced verification processes, and logs of outcomes.
- **Responsible Gaming interactions:** all contacts with players related to responsible gaming, including support chats, emails, calls, interventions, and notes on observed risk indicators.

- **Player-imposed settings:** details of deposit limits, loss limits, time limits, reality checks, cooling-off selections, and self-exclusion requests, including timestamps of activation, modifications, and expiry.
- **Operator-initiated measures:** all cases of operator-initiated restrictions, account suspensions, or exclusions, including justification, actions taken, and communication with the player.
- **Breaks and exclusions:** documentation of all cooling-off and self-exclusion activations, covering duration, scope (brand/vertical), marketing suppression applied, and reactivation process.
- **Staff training logs:** records of all RG-related training sessions, attendance, training materials, and evidence of completion by relevant staff.
- **Marketing compliance:** evidence of suppression of promotional activity toward excluded or high-risk players, including CRM system logs, campaign filters, and opt-out confirmations.

15.2 Retention periods

- **Operator-initiated exclusions and enhanced interventions:** retained for a minimum of five (5) years from the date of action.
- **Other responsible gaming records:** retained for the period required under LOK and internal data retention schedules, ensuring availability for at least five (5) years unless longer retention is required by law or regulatory request.
- **Training logs and marketing suppression evidence:** retained for at least five (5) years to demonstrate ongoing compliance.

15.3 Data integrity and security

- Records are maintained in secure electronic systems with access controls, encryption, and audit trails to prevent unauthorized changes.
- Any manual or paper records are stored securely with restricted access and digitized promptly.
- Systems must ensure records are accurate, complete, and retrievable in a timely manner.

15.4 Audit and inspection

- Records must be readily available for inspection by the CGA upon request, including through direct system access where required.
- Internal audits of RG recordkeeping are conducted at least annually by the Responsible Gaming Officer or Compliance Officer.
- Findings from audits are documented and presented to senior management with recommendations for improvement.
- External audits or regulatory reviews are supported by providing complete, accurate, and timely records without obstruction.

15.5 Accountability and reporting

- The Responsible Gaming Officer oversees the integrity of RG recordkeeping and ensures consistency across all brands and domains.
- Any deficiencies identified in recordkeeping or audit processes must be documented, addressed promptly, and included in the annual RG effectiveness report.

16. Publication, versioning, and reporting

- The current Policy is published on both domains and uploaded to the CGA portal.
- Version numbers and dates are displayed on the published Policy.
- Material updates are communicated to the CGA.