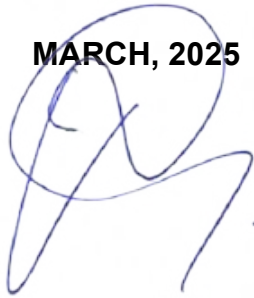


IRIDIUM GROUP N.V.
153995

RESPONSIBLE GAMING POLICY

APPROVED BY THE BOARD OF DIRECTORS

MARCH, 2025

A handwritten signature in blue ink, consisting of a large, stylized 'A' followed by a long, sweeping horizontal stroke that ends in a small upward flick.

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1. Overview of Responsible Gaming Policy

At Iridium Group N.V. (Company Number: 153995), we are dedicated to maintaining a secure, fair, and socially responsible gaming environment. As a licensed operator (OGL/2024/427/1022) under the Curaçao Gaming Control Board (GCB), we implement robust responsible gaming measures to protect players, prevent problem gambling, and ensure that gaming remains an enjoyable leisure activity rather than a risk to financial or personal well-being.

Commitment to Player Protection

To uphold industry best practices and comply with GCB regulatory standards, Iridium Group N.V. has embedded responsible gaming principles throughout its operations. Our approach includes:

- Seamlessly integrating responsible gaming safeguards across our platform to promote ethical play.
- Developing and maintaining a comprehensive Responsible Gaming Policy that meets regulatory expectations and adapts to evolving compliance standards.
- Ensuring transparency and accessibility by keeping the Responsible Gaming Policy available on the GCB Licensee Portal, where it undergoes regular regulatory review.
- Continuously assessing and refining our responsible gaming framework, using data-driven insights to improve player protection strategies.

Purpose & Implementation

This policy is designed to provide clear guidelines, player resources, and intervention measures that help individuals manage their gambling behavior effectively. By implementing structured prevention tools, self-exclusion options, and player support initiatives, Iridium Group N.V. reinforces its commitment to safe and responsible gaming practices, ensuring full compliance with Curaçao Gaming Control Board regulations.

2. Player Protection Requirements & Measures

To meet the licensing conditions set by the Curaçao Gaming Control Board (GCB), Iridium Group N.V. (Company Number: 153995) enforces a structured approach to responsible gaming, ensuring that safeguards are in place to protect players and prevent gambling-related harm.

Mandatory Responsible Gaming Measures

In compliance with CGB regulations, the company integrates the following essential player protection protocols:

- Strict Age Verification – Ensuring all players meet the legal gambling age requirement through robust identity authentication processes.
- Accessible Responsible Gaming Information – Providing clear and visible information across all platforms, allowing players to make informed decisions.
- Self-Assessment Resources – Offering evaluation tools that help individuals assess their gambling habits and identify potential risks.
- Behavioral Monitoring Systems – Utilizing tracking mechanisms to detect patterns of excessive gambling or risky behaviors.
- Cooling-Off & Self-Exclusion Options – Allowing players to temporarily or permanently suspend their gambling activities when needed.
- Deposit & Spending Limits – Enabling players to set financial controls to better manage their gaming expenditures.
- Staff Training & Awareness Programs – Educating employees, affiliates, and marketing partners on the importance of responsible gaming principles.
- Ethical Marketing Practices – Ensuring that all advertising and promotional activities comply with responsible gaming standards, avoiding targeting minors, self-excluded players, or financially vulnerable individuals.

Responsible Gaming Oversight & Internal Governance

To maintain accountability and ensure continuous compliance, a Responsible Gaming Officer (RGO) will be appointed to oversee policy enforcement. Until an RGO is formally assigned, the Compliance Officer (excluding AML/CFT responsibilities) will assume oversight of responsible gaming initiatives. Their key responsibilities include:

- Conducting an annual review of the Responsible Gaming Policy to evaluate effectiveness.
- Submitting detailed reports to the Executive Management Team, outlining key findings and proposed improvements.
- Updating policies and regulatory filings in accordance with Curaçao Gaming Control Board (GCB) guidelines.

Player Protection Measures

To create a secure and controlled gaming environment, Iridium Group N.V. enforces a range of protective policies, including:

- Comprehensive Responsible Gaming Programs – Establishing structured guidelines that promote safe and ethical gaming practices.
- Educational Tools & Awareness Campaigns – Providing players with relevant information, risk assessment quizzes, and self-management options.
- Real-Time Behavior Monitoring – Implementing technology-driven systems to detect and flag potential problem gambling behavior.
- Regulatory Audits & Compliance Reports – Ensuring full transparency and adherence to licensing conditions, including routine reporting and policy updates.

By implementing these measures, Iridium Group N.V. reinforces its commitment to player safety, responsible gaming, and regulatory integrity, ensuring that gambling remains a controlled and enjoyable activity while prioritizing industry best practices and compliance standards.

3. Information & Accessibility

Providing transparent and easily accessible responsible gaming information is a core element of Iridium Group N.V.'s (Company Number: 153995) commitment to player protection and ethical gambling practices. Ensuring that players can make informed decisions and access responsible gaming tools when needed is central to our approach.

Integration of Responsible Gaming Information

To facilitate seamless access to responsible gambling resources, Iridium Group N.V. embeds essential information and support mechanisms throughout its website and gaming platform.

- Homepage Accessibility – The Responsible Gaming Policy is prominently displayed on the homepage, ensuring that players can easily locate and review responsible gaming information.
- Multilingual Availability – The policy is available in English and other relevant languages to ensure comprehension across different player demographics.
- Direct Access to Player Protection Tools – Players can quickly access responsible gaming features, including:
 - Self-exclusion options to restrict gambling access for a set period.
 - Cooling-off periods for temporary gaming breaks.
 - Deposit limits to help regulate financial engagement in gaming.

- Support Contact Information – Players have direct access to responsible gaming assistance via email and live chat, ensuring they can seek help when necessary.

Responsible Gaming Policy & Terms & Conditions

To further ensure regulatory compliance and player awareness, the Responsible Gaming Policy is explicitly referenced in the Terms & Conditions.

- Players are made fully aware of their responsible gaming options and tools.
- The Terms & Conditions remain easily accessible and can be navigated within a single click from the homepage.
- Players can review key responsible gambling guidelines at any time.

Regulatory Compliance & Footer Information

As part of its commitment to responsible gaming, Iridium Group N.V. ensures that the website's footer section displays critical compliance and responsible gambling statements, including:

- A clear message prohibiting underage gambling (18+ only).
- The official name and registered address of Iridium Group N.V..
- The license number issued by the Curaçao Gaming Control Board (GCB).
- A statement confirming regulatory oversight under the GCB.
- A direct link to the Responsible Gaming Policy Statement for quick access.
- The GCB's official digital seal, affirming the company's commitment to compliance.

Access to Support Services & Gambling Assistance

Recognizing the importance of external support services, Iridium Group N.V. provides direct links to recognized gambling addiction organizations, ensuring players who need professional assistance can access trusted support networks.

By ensuring responsible gaming tools, educational resources, and support networks are readily available, Iridium Group N.V. reinforces its commitment to responsible

gambling and regulatory compliance, prioritizing player safety and ethical gaming practices.

4. Age Verification & Safeguards Against Underage Gambling

Age verification protocols are strictly enforced to prevent underage gambling and ensure full compliance with Curaçao Gaming Control Board (GCB) regulations. Players must confirm that they are at least 18 years old before they are permitted to register, deposit funds, or place bets. Any account found to belong to an underage individual is immediately restricted, and necessary actions are taken to prevent further access.

Age Verification Procedures

To confirm a player's age and eligibility, Iridium Group N.V. implements a multi-step verification process, which includes:

1. Declaration of Legal Age – During registration, players must confirm their date of birth and declare that they are at least 18 years old.
2. Government-Issued ID Verification – Players must submit a valid passport, national identity card, or driver's license as proof of age in case KYC or AML milestones are reached by the player; however, if Gameplay International B.V. has any doubt of a player's age before the mentioned milestones are reached, ID Verification is to be requested earlier.
3. Payment Method Validation – When applicable, credit card verification or other approved payment methods may be used as an additional check.

Actions Taken Against Underage Accounts

If an account is suspected of belonging to a minor, immediate steps are taken to prevent access until verification is completed. If underage gambling is confirmed:

- The account is permanently closed to prevent further access.
- Deposited funds are refunded (except for cases involving AML restrictions).
- All winnings are forfeited in accordance with regulatory guidelines.
- A formal notice is sent to the underage individual, explaining the reason for account closure.

Enhanced Security & Additional Verification Measures

To further strengthen our age verification process, additional security checks may be implemented when necessary:

- Secondary verification methods, such as:
 - Proof of address validation via utility bills or bank statements.
 - Selfie verification, requiring the player to submit a photo holding their identification document.
 - Third-party database checks to cross-reference player details.
- Proactive age verification before key KYC or AML milestones, if there is any doubt regarding a player's age.
- Comprehensive record-keeping of all age verification attempts, with logs available for regulatory audits when requested.

Parental Controls & Internet Filtering

To assist in preventing minors from accessing gambling websites, Iridium Group N.V. encourages parents and guardians to take preventative measures, including:

- Securing devices, login credentials, and stored payment methods to prevent unauthorized access.
- Utilizing trusted parental control software to block gambling websites, such as:

- o Net Nanny (www.netnanny.com)
- o GamBlock (www.gamblock.com)

- CyberSitter (www.cybersitter.com)

Commitment to Responsible Gaming & Compliance

By enforcing strict age verification measures and providing resources for parental control, Iridium Group N.V. ensures that minors are protected from exposure to gambling activities, creating a safe and legally compliant gaming environment that fully aligns with Curaçao Gaming Control Board regulations.

5. Monitoring Player Behavior & Identifying Risk Patterns

At Iridium Group N.V. (Company Number: 153995), we utilize advanced monitoring tools and human oversight to identify signs of problematic gambling behavior. Our proactive approach ensures compliance with Curaçao Gaming Control Board (GCB) regulations, helping us intervene when necessary to reduce gambling-related harm and promote responsible gaming.

Detecting High-Risk Player Activity

Our real-time behavior tracking system continuously analyzes player interactions and financial patterns to detect early warning signs of compulsive or high-risk gambling behavior. Key risk indicators include:

- Unusual deposit and betting frequency, such as sudden increases or erratic wagering activity.
- Use of multiple payment methods in an attempt to bypass set deposit limits.
- Frequent withdrawal reversals, where players repeatedly cancel pending cash-out requests.
- Prolonged gaming sessions without breaks, which may indicate compulsive gambling tendencies.
- Repeated interactions with customer support, including requests for bonuses or signs of frustration/agitation.
- Frequent modifications to responsible gaming settings, such as increasing deposit limits or excessively using cooling-off periods.
- High levels of gambling activity among younger players (under 25 years old), especially in high-risk categories like casino games.
- Excessive use of credit cards or registration of multiple payment methods.
- Spending patterns that do not match the player's financial profile.
- Attempts to open multiple accounts to bypass deposit, loss, or exclusion limits.

Player Risk Profiling & Continuous Assessment

Each player has a risk profile that is continuously monitored based on betting behavior, financial transactions, and gameplay history. If unusual activity patterns emerge, the system triggers immediate alerts for further evaluation by responsible gaming specialists.

Intervention & Player Protection Measures

When a player exhibits problematic gambling behavior, Iridium Group N.V. initiates a structured intervention process to assess risk levels and offer support. Steps taken may include:

- Direct player communication, where trained responsible gaming specialists engage the player to assess concerns.
- Setting financial limits, including reducing deposit caps or restricting high-risk gambling activities.
- Temporary account suspensions, ensuring that players take a break from gambling if their behavior suggests a lack of control.
- Implementing self-exclusion measures, permanently restricting access to gaming services in extreme cases.

Staff Training & Responsible Gaming Awareness

To ensure effective problem gambling intervention, our customer support teams, VIP managers, and responsible gaming officers undergo specialized training on:

- Recognizing behavioral signs of gambling distress, including agitation, desperation, or aggressive player interactions.
- Conducting structured, supportive conversations to assist at-risk players.
- Educating players on responsible gaming tools, including deposit limits and self-exclusion options.
- Ensuring all interactions are documented for regulatory reporting and compliance tracking.

Escalation & High-Risk Case Management

If a player's gambling behavior suggests severe risk, the case is escalated to the Compliance Officer or Responsible Gaming Officer, who determines the most appropriate action, which may include:

- Tighter gambling restrictions or exclusions.
- Referral to problem gambling support services.
- Regulatory reporting of high-risk cases in accordance with GCB guidelines.

By combining data-driven behavioral monitoring, direct intervention strategies, and regulatory compliance, Iridium Group N.V. ensures that gambling-related risks are

detected and addressed early, reinforcing player protection and responsible gaming commitments while fully adhering to Curaçao Gaming Control Board regulations.

6. Self-Assessment Tools for Players

At Iridium Group N.V. (Company Number: 153995), we encourage players to actively evaluate their gambling behavior and make well-informed decisions about their gaming activities. To support responsible play, we provide self-assessment tools designed to help individuals determine whether their gambling habits remain within healthy and controlled limits.

Access to Betting & Wagering History

To promote transparency and self-awareness, players can review their full transaction history, including:

- A detailed record of bets and wagers made since the account was opened.
- Timestamped transaction logs that help players track their financial activity.
- Deposit and withdrawal summaries to allow individuals to assess their spending patterns.

By consistently reviewing their gaming history, players can detect potential risk behaviors and make informed choices about modifying their gambling habits if necessary.

Self-Assessment Tools for Players

To help players recognize potential gambling-related risks, Iridium Group N.V. offers internationally recognized self-assessment questionnaires.

Encouraging Responsible Gaming Tools

Players who identify potential problem gambling behaviors through self-assessment are encouraged to make use of the responsible gaming tools available on our platform, such as:

- Deposit Limits – To restrict financial exposure and manage spending.
- Self-Exclusion – A voluntary restriction to prevent access to gambling for a defined period.
- Cooling-Off Periods – Temporary gaming suspensions for individuals needing short-term breaks.

Additionally, Iridium Group N.V. provides direct links to external gambling support organizations, ensuring that players have access to professional assistance if required.

By offering self-assessment tools, access to gaming history, and intervention resources, Iridium Group N.V. empowers players to maintain control over their gambling behavior, while ensuring compliance with Curaçao Gaming Control Board (GCB) regulations.

7. Temporary & Long-Term Player Restrictions

At Iridium Group N.V. (Company Number: 153995), we offer accessible and instant cooling-off options, allowing players to temporarily step away from gambling whenever they feel it is necessary. This feature enables individuals to pause their gaming activity without unnecessary delays or obstacles, supporting responsible gambling practices. If technical modifications are required to enhance this feature, manual processing of cooling-off requests will be facilitated until an automated solution is fully operational.

A comprehensive self-exclusion program is designed to help players regain control over their gambling behavior and mitigate potential gambling-related harm. This self-exclusion feature is readily accessible, takes immediate effect upon request, and applies across all platforms and gaming services operated by Iridium Group N.V.

7.1. Cooling-Off Periods

Players have the option to activate a temporary gambling restriction for a duration of:

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

The cooling-off feature is prominently displayed on the platform and can be activated instantly with a single click, requiring no manual approval or email request. This restriction may be applied across specific gaming categories or all gambling activities on the platform.

Immediate Restrictions Upon Activation

Once a player selects a cooling-off period, the following actions take effect immediately:

- The player is notified about the difference between a Cooling-Off period and Self-Exclusion, with an option to opt for a longer self-exclusion period if desired.
- The account is temporarily locked, preventing the player from engaging in any gambling activities for the chosen duration.
- The player has the option to disable marketing communications for the duration of the cooling-off period to avoid receiving promotional material.

Prohibition of Player Deterrence

Iridium Group N.V. strictly prohibits any attempts to discourage players from initiating a cooling-off period. The following practices are not permitted:

- Questioning a player's decision or attempting to persuade them to reconsider.
- Imposing unnecessary delays in processing the request.
- Providing incentives such as bonuses or promotions as a way to encourage continued gambling.

Account Reactivation & Additional Responsible Gaming Options

- At the conclusion of the cooling-off period, the player's account is automatically reactivated, allowing them to resume gaming without further action.
- If a player determines that they need longer-term restrictions, they are encouraged to explore options such as extended time-outs or self-exclusion programs.

By ensuring that cooling-off periods are player-driven, interference-free, and immediately effective, Iridium Group N.V. reinforces its commitment to responsible gaming and player protection, ensuring full compliance with Curaçao Gaming Control Board (GCB) regulations.

7.2. Self-Exclusion Periods

Players can activate self-exclusion directly through a clearly displayed option on the website, where they will find:

- A step-by-step guide on how to self-exclude.
- Available self-exclusion duration options and their implications.
- An explanation of the benefits of self-exclusion, emphasizing its role in preventing problem gambling and maintaining responsible gaming habits.

The self-exclusion process is fully automated, eliminating the need for email requests or manual approval. The system is designed for efficiency, ensuring that players can complete the request within 15 minutes.

Immediate & Irreversible Action

Once a self-exclusion request is submitted, the following restrictions are instantly applied:

- All gambling access is revoked, and the player's account is immediately locked.
- Deposits, wagers, and withdrawals are blocked for the duration of the exclusion period.

- All known payment methods used by the player are also blocked, preventing circumvention of restrictions.
- The player's information is added to the Self-Exclusion Register, where records are kept for a minimum of seven years after the exclusion period ends.
- Players are encouraged to extend their self-exclusion to other gambling sites, further reinforcing their commitment to responsible gaming.
- Measures are in place to detect and block duplicate accounts created by self-excluded individuals.

Self-Exclusion Duration Options

In line with Clause 5.4(2) of the LOK, players can choose to self-exclude for:

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

Once a self-exclusion request is activated, it cannot be reversed before the selected exclusion period expires.

Prohibited Actions During Self-Exclusion Requests

Iridium Group N.V. enforces a strict policy against discouraging players from self-exclusion. The following actions are not permitted:

- Questioning a player's decision or persuading them to reconsider.
- Causing unnecessary delays in processing the self-exclusion request.
- Offering bonuses, incentives, or promotions to influence the player to continue gambling.

Players may opt to exclude themselves from specific gaming categories or apply restrictions across the entire platform depending on their needs.

Financial & Account Management During Self-Exclusion

For players opting for full self-exclusion, the following actions take effect:

- All gambling-related transactions are blocked immediately.
- The player's account is deactivated, restricting further gameplay.
- Any remaining funds (excluding those restricted due to AML policies) are refunded within two business days.
- The player's details are permanently removed from marketing and promotional databases.

For partial self-exclusion (restricting specific game types but not all), gambling and wagering are blocked only for the selected gaming verticals.

Post-Exclusion Reactivation & Account Restoration

Once the self-exclusion period ends, the player must:

1. Submit a written request confirming their intent to reactivate their account.
2. Receive a responsible gaming advisory message, reminding them of available safeguards.
3. Be encouraged to complete a self-assessment, such as the Gamblers Anonymous 20-Question Quiz, to evaluate their readiness to resume gambling.

The player's account history remains intact, and reactivation is only permitted under their original account credentials, preventing duplicate registrations.

Marketing & Contact Restrictions During Self-Exclusion

During and after self-exclusion:

- Iridium Group N.V. will not send promotional materials or gambling-related incentives.
- The player will not be contacted for gambling-related activities, except where legally required (e.g., account security notices).
- Unlike cooling-off periods, self-exclusion requires the player to actively request reactivation once the exclusion term expires.

Regulatory Compliance & Reporting

All self-exclusion requests and interventions are documented in real time. If a self-excluded player or minor is found gambling, the following actions will be taken:

- The player's account will be immediately blocked.
- Deposited funds will be refunded within two business days, except for cases restricted under AML policies.
- A detailed report will be submitted to the GCB within five working days, outlining the breach and corrective actions taken.

Operator-Initiated Exclusion

If a player demonstrates high-risk gambling behaviors, Iridium Group N.V. reserves the right to proactively exclude them from the platform as an intervention measure. Grounds for operator-initiated exclusion include:

- Compulsive gambling patterns or signs of addiction.

- Financial distress linked to excessive gambling activity.
- Fraudulent or criminal activity associated with the player's account.

All operator-initiated exclusions are formally documented, with records maintained for a minimum of five years. The Curaçao Gaming Control Board (GCB) may request these records at any time for compliance verification.

By implementing a structured, transparent, and player-focused self-exclusion process, Iridium Group N.V. ensures strong player protection, regulatory compliance, and a safer gambling environment for all users.

8. Session Tracking & Reality Check

At Iridium Group N.V. (Company Number: 153995), we prioritize responsible gambling by promoting player awareness of gaming duration and financial engagement. We implemented special Reality Check tool – Real-Time Session Tracking to help players monitor their playtime and spending, enabling them to make informed decisions about their gambling activity.

To ensure players remain aware of their gaming activity, a persistent session timer is displayed at all times while they are logged into their account. This allows individuals to track their active play duration and assess whether they need to take a break or set gaming limits.

By integrating Reality Check, Iridium Group N.V. ensures that players remain informed and in control of their gambling activity, reinforcing responsible gaming principles while complying with Curaçao Gaming Control Board (GCB) regulations.

9. Deposit Limits & Responsible Gambling Controls

At Iridium Group N.V. (Company Number: 153995), we prioritize responsible gambling by providing players with customizable financial limits, allowing them to manage their spending habits and gaming behavior in a controlled manner. These limits help prevent excessive gambling and align with best practices for responsible gaming.

Deposit Limit Options

Players can establish personalized financial restrictions by setting daily, weekly, or monthly deposit limits, ensuring that they stay within their preferred gambling budget.

- Once the limit is reached, no further deposits can be made until the selected period resets.
- Stricter deposit limits can be applied at any time, and these adjustments take immediate effect to enhance player protection.
- Requests to increase a deposit limit are subject to a mandatory seven-day waiting period, allowing players to make well-considered financial decisions.

Exceptions & Pending Wager Considerations

In some cases, when a deposit limit or self-exclusion request is activated, ongoing wagers or active gameplay may be allowed to conclude before restrictions take full effect. These exceptions include:

- Players participating in an active poker tournament when a time limit is reached.
- Unresolved ante-post bets on future events, where wagers remain valid until the outcome is determined.

During these scenarios, while new deposits and bets will be blocked immediately, the system will allow active bets or gameplay to conclude before fully enforcing the restriction.

Commitment to Responsible Gambling & Compliance

By integrating customizable deposit limits and additional safeguards, Iridium Group N.V. ensures that players have the necessary tools to gamble responsibly, while also maintaining full compliance with Curaçao Gaming Control Board (GCB) regulations.

10. Responsible Marketing & Advertising Compliance

At Iridium Group N.V. (Company Number: 153995), we are committed to ensuring that all marketing, promotional, and advertising activities align with responsible gaming principles and do not encourage excessive or reckless gambling behavior. Our advertising approach emphasizes transparency, fairness, and player protection, ensuring that misleading content or unethical marketing tactics are never used.

Additionally, all marketing efforts must exclude minors, self-excluded players, and financially vulnerable individuals. All business partners, including affiliates, influencers, and VIP representatives, are required to follow strict responsible gaming guidelines.

Responsible Advertising Standards

To maintain compliance with Curaçao Gaming Control Board (GCB) regulations, Iridium Group N.V. enforces strict advertising policies, which include the following restrictions:

- No deceptive or aggressive marketing tactics – All advertisements are clear, truthful, and non-coercive.
- No targeting of vulnerable individuals – Promotions are not directed at minors, self-excluded players, or individuals exhibiting problem gambling behaviors.

- No portrayal of gambling as an investment strategy – Advertising does not suggest that gambling is a means to generate income, pay off debts, or achieve financial success.
- No misrepresentation of chance-based games – Marketing does not imply that player skill can influence the outcome of games of chance.
- No emotional manipulation – Gambling is not be presented as a solution to stress, depression, or personal struggles in Iridium Group N.V.'s marketing materials.
- No child-friendly content – Cartoons, animations, or other youth-targeted visuals are not used in Iridium Group N.V.'s marketing materials.
- No use of celebrities or influencers with significant underage audiences – Social media personalities or entertainers with a following of minors are not used for Iridium Group N.V.'s gambling promotions.
- No explicit or suggestive content – Gambling advertisements avoid sexually provocative or inappropriate imagery.
- No association with high-risk behaviors – Iridium Group N.V.'s gambling promotions are not linked to activities such as smoking, drug use, or excessive alcohol consumption.

Bonus Promotions & Transparency

To ensure fairness and clarity, all bonus offers and promotions are communicated with full transparency:

- Bonus terms and conditions are explicitly stated and easy to understand.
- Promotions do not encourage excessive gambling or suggest that players can recover losses by continuing to wager.
- Marketing campaigns do not mislead players regarding bonus eligibility, wagering requirements, or payout conditions.

Commitment to Responsible Gaming in Advertising

To reinforce awareness of responsible gambling, Iridium Group N.V. ensures that all marketing materials include clear responsible gaming messages:

- All advertisements display responsible gambling disclaimers and direct players to support resources.
- Offline advertising complies with responsible gambling guidelines set by GCB and media platforms.
- Social media gambling advertisements must be age-restricted and clearly labeled as gambling-related content.
- Direct marketing campaigns (emails, SMS, push notifications) must exclude self-excluded players and individuals with gaming limits.

Affiliate & Influencer Marketing Compliance

Iridium Group N.V. holds affiliates, influencers, and marketing partners accountable for adhering to responsible gaming policies. To ensure compliance:

- Affiliates must sign legally binding agreements enforcing responsible marketing guidelines.
- Regular compliance audits are conducted to prevent misleading or unethical promotions.
- Strict penalties are imposed for non-compliance with responsible gaming policies.

For social media influencers, additional requirements include:

- Strict age verification to ensure that their target audience consists of adults.
- No association with minors or vulnerable individuals.
- Avoidance of sexually provocative or misleading gambling endorsements.

Sponsorships & Responsible Branding

All sponsorships and branding agreements must adhere to strict responsible gaming policies:

- Sponsorship materials must not target minors or appear on youth-related merchandise.
- Gambling-related branding must not be featured at events aimed at underage audiences.
- Responsible gambling messages must be included in all sponsorship content.

By prioritizing responsible advertising, enforcing strict compliance, and maintaining transparency, Iridium Group N.V. ensures that all marketing efforts uphold ethical gaming standards while protecting players from misleading or excessive gambling influences.

11. Key Terminology and Definitions

- Games of Chance – Refers to any gambling activity in which players place bets using money or its equivalent in the hope of winning monetary prizes. The outcome is determined either entirely by chance or through a combination of chance and player skill, with no significant influence from the player on the final result. Examples include poker, sports betting, and other casino-style games.
- LOK (National Ordinance on Games of Chance) – The primary legislative framework governing gambling operations in Curaçao. This law sets licensing,

compliance, and responsible gaming standards for operators within the jurisdiction.

- **Marketing, Promotion, and Advertising** – Covers all strategies, materials, and media channels used to promote an operator's brand, platform, gaming services, or offers. This includes traditional print advertisements, digital marketing campaigns, online promotions, and social media engagement.
- **Mandatory Requirements** – The fundamental responsible gaming obligations that all licensed operators must adhere to. These measures are designed to align with the operator's target audience and gaming market, ensuring that responsible gambling principles are embedded into business operations.
- **Operator** – An entity licensed by the Curaçao Gaming Control Board (GCB) to conduct B2C gaming activities, or a holder of an Orange Digital Seal "Certificate of Operations", permitting it to legally offer games of chance.
- **Self-Exclusion** – A voluntary restriction program that allows players to proactively prevent themselves from participating in gambling activities on a specific platform. Self-exclusion applies across all gaming brands and websites operated by the same licensee, ensuring that players cannot circumvent the exclusion process by creating new accounts.
- **Vulnerable Person** – As defined under Clause 1.1(h) of the LOK, a vulnerable person includes individuals who:
 1. Are under the age of 18 and legally prohibited from gambling.
 2. Have limited or no control over their gambling behavior, putting them at risk of or already developing gambling addiction, potentially leading to personal or financial harm.
 3. Have been legally prohibited from gambling, either by court order or personal request.
 4. Have been declared bankrupt, indicating significant financial instability that makes gambling a high-risk activity.

These definitions form the foundation of responsible gaming policies at Iridium Group N.V. (Company Number: 153995), ensuring compliance with Curaçao Gaming Control Board (GCB) regulations and industry best practices.