

Code Harbor N.V.

RESPONSIBLE GAMING POLICY

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Summary of Key Definitions

- **CGA (Curaçao Gaming Authority):** The regulatory authority overseeing the licensing, compliance, and responsible operation of games of chance in Curaçao.
- **Cooling Off:** A temporary, self-imposed period (ranging from hours to months) during which a player cannot engage in any gambling activities.
- **Games of Chance:** Any game where players pay to participate and the outcome is based on chance (entirely or partially), with little or no player influence. Includes poker and sports betting.
- **LOK (National Ordinance on Games of Chance):** The primary legal framework governing the regulation and oversight of games of chance in Curaçao.
- **Marketing, Promotion, and Advertising:** All communication and media (print, digital, social, etc.) used to promote an operator's platforms, brands, or gambling services.
- **Mandatory Requirements:** The essential components of a Responsible Gaming policy that every licensed operator must implement, tailored to their market and customer base.
- **Minor:** Any individual under the age of 18.
- **Operator:** A company licensed by the CGA to offer B2C online gaming services, including those with an Orange or Green Digital Seal.
- **Self-Exclusion:** A voluntary action by a player to restrict their own access to gambling services, either partially or entirely, for a defined period or indefinitely.
- **Vulnerable Person:** Defined under the LOK as an individual who:
 - o Is under 18;
 - o Lacks control over their gambling behavior and is at risk of addiction;
 - o Has requested or been subjected to a gambling ban;
 - o Has been declared bankrupt.

1. Introduction

At **Code Harbor N.V.**, (the Company or WildWinz) we are firmly committed to promoting responsible gaming and minimizing gambling-related harm. Our Responsible Gaming Policy is designed in strict accordance with the requirements set forth in the National Ordinance on Games of Chance (LOK) and the Curacao Gaming Authority's (CGA) Responsible Gaming Policy, Version 1.0, dated 17 April 2025. We believe that online gaming should always remain an entertaining and enjoyable activity and should never be pursued as a source of income or as a means to escape financial hardship.

2. General Principles

WildWinz recognizes that while most users gamble within their limits, a small portion of players may lose control over their gambling behavior. Our Responsible Gaming Policy ensures that vulnerable individuals are protected through proactive measures,

comprehensive information accessibility, self-help tools, intervention protocols, and access to professional support.

We do not allow players under the age of 18 to use our platform. We explicitly prohibit offering credit for gambling purposes. WildWinz will never knowingly target vulnerable individuals in marketing campaigns and will take all measures to exclude such individuals from gameplay and promotions.

3. Responsible Gaming Section and Accessibility

WildWinz maintains a clearly identifiable and accessible Responsible Gaming (RG) section on the homepage of our website. This section is available in English and the primary language(s) of the target market. In case of discrepancy, the English version will take precedence.

The RG section includes:

- A full version of this policy.
- Direct access to RG tools such as deposit limits, loss limits, wager limits, time/session limits, reality checks, cooling-off, and self-exclusion.
- Self-assessment tools.
- Contact information for RG inquiries (support@wildwinz.com).
- Links to international and local gambling addiction support services.

4. Prevention of Underage Gambling

WildWinz enforces a strict age verification process in compliance with Article 1.4(d) of the LOK and CGA guidelines:

- All new players must self-declare their age during registration and confirm that they are at least 18 years old.
- Government-issued identification (e.g., passport, national ID, driver's license) is required prior to the first withdrawal and upon reaching predetermined threshold of XCG 4,000/EUR 2,000.
- Secondary electronic verification tools may be used (e.g., payment validation, selfie checks).
- Accounts found to be used by minors will be immediately closed, and all deposits refunded in accordance with civil law.
- Parents are encouraged to use parental control software such as CyberPatrol and GamBlock to prevent underage access.

5. Personal Limits and Safer Gambling Tools

Players have access to the following tools in the "Personal Limits" section:

- **Deposit Limit:** Daily, weekly, or monthly cap on the total deposit amount.
- **Loss Limit:** Restricts net losses based on total account balance, not just initial deposits.
- **Wager Limit:** Limits total wagering volume.
- **Time Limit:** Maximum gaming session duration.
- **Reality Checks:** Periodic notifications (e.g., every 60 minutes) to inform players of session length.

Limits can be adjusted at any time. Decreases take effect immediately. Increases require email confirmation and a mandatory 24-hour cooling-off period.

6. Self-Assessment Tools

WildWinz provides a self-assessment tool to help players evaluate their gambling habits. We offer the Gamblers Anonymous 20 Questions as well as the CAGE questionnaire:

- If a player answers “yes” to two or more questions, they are advised to use our RG tools and consult professional support.
- All results are anonymous and non-binding.

Access to Gaming History. Players can access from their account a detailed record of their betting and wagering history, including transaction timestamps, covering at least the most recent six months, without prejudice to longer statutory retention periods. On request, the Company provides longer periods of transaction history within 10 working days.

7. Cooling-Off and Self-Exclusion

WildWinz provides clear, non-coercive options for temporary or permanent breaks from gambling:

7.1. Cooling-Off

- Options: 1 day, 3 days, 1 week, 1 month, 3 months, 6 months.
- During this period, the account remains accessible for withdrawal purposes only. No deposits, wagers, or promotions are permitted.
- Accounts automatically reactivate upon expiration.

7.2. Self-Exclusion

- Options: a long-term self-exclusion periods of 1 year, with additional options for 3 years, 5 years, 10 years, and lifetime exclusion.
- Self-exclusion may apply to all verticals or specific game types, as selected by the player.

- The player should be encouraged to self-exclude from other gambling sites.
- This is irrevocable for the selected duration.
- Access to the account is fully blocked.
- Players will not receive any marketing communications.
- Players may request withdrawal of remaining funds by contacting support@wildwinz.com.
- All requests for self-exclusion must be implemented without delay.

Activation. Players are able to initiate and complete self-exclusion fully online via the RG Section of the website, without requiring email communication or operator approval. Where, exceptionally, a player requests self-exclusion by email or live chat, the elected option is enabled within 24 hours. All self-exclusion requests are implemented without delay; the Company does not question the player's decision, offer any bonus or incentive to dissuade them, or complicate the process.

Wagering placed after a self-exclusion request but before it takes effect is voided and the funds returned to the player, subject to AML/CFT obligations. Ante-post bets are voided and refunded; any poker tournament in progress at the time of self-exclusion must be completed. Contributions already made to progressive jackpots through gameplay before the self-exclusion remain in place, but the player is not entitled to participate in the jackpot after the self-exclusion takes effect.

Reactivation after self-exclusion. Self-exclusion is irrevocable for the selected period and cannot be lifted early. After the selected period ends, the account is not reactivated automatically: the player must request reactivation in writing (by email or live chat) through the official support channels. The Company will not initiate reactivation or re-commence communications with the player for this purpose. Where possible, any payment method known to have been used by the self-excluded player is blocked for the duration of the exclusion to prevent circumvention, and the Company applies robust measures to detect and prevent the creation of duplicate accounts by self-excluded individuals.

7.3. Operator-Initiated Exclusion

- Based on behavior monitoring, WildWinz may suspend or permanently exclude players at risk.
- The Company will not exclude a player solely on the basis of the amount of their winnings. All operator-initiated exclusions are formally documented, and the records are retained for at least five years and made available to the CGA on request.

8. Behaviour Tracking and Interventions

WildWinz employs both manual (staff) and automated (AI/ML) behavior tracking mechanisms to detect signs of problem gambling. Risk indicators include:

- Reversal of withdrawals
- Unusual session duration or frequency
- Rapid deposit/loss cycles
- Excessive support contact, bonus-seeking behavior
- Repeated adjustments to RG tools

8.1. Intervention Protocol

- Documented via PAM system
- Steps: warning notification → imposed limits → temporary suspension → exclusion (if risk persists)
- Players are informed of RG tools and support options during each step
- Under no circumstances will RG measures be misused to delay withdrawals

9. Staff Training and Internal Accountability

All relevant WildWinz personnel, including support, VIP, and marketing teams, undergo mandatory RG training upon hiring and annually thereafter. Training includes:

- Understanding signs of problem gambling
- Ethical and responsible player communication
- Intervention procedures
- Legal obligations under LOK and CGA rules

The company designates a Responsible Gaming Officer or Compliance Officer (non-AML/CFT) to oversee this policy and report to management annually with recommendations and outcomes.

10. Advertising and Promotions

All WildWinz marketing materials:

- Contain clear RG messaging
- Never target minors or vulnerable individuals
- Do not present gambling as a financial solution
- Avoid false claims or misleading imagery

Promotions and bonuses are never offered to self-excluded or cooling-off players. No direct marketing is sent to players identified as at-risk.

11. Website Footer Requirements

The homepage and app footer contain:

- Warning that gambling is prohibited for individuals under 18
- Company name and registered address
- CGA license number
- Link to the Responsible Gaming Section
- CGA digital seal
- Links to support sites: GamCare, Gambling Therapy, Gamblers Anonymous
- A statement confirming that the Company's operations are subject to regulatory oversight by the Curaçao Gaming Authority.

12. Recordkeeping and Monitoring

WildWinz maintains comprehensive records of:

- Age verification processes
- RG tool activations and changes
- Self-assessments (anonymized)
- RG interventions and outcomes
- Complaints and exclusion requests

These are stored in secure systems and made available to the CGA on request. Changes to this policy are submitted to the CGA and published in the RG section upon approval.

13. Contact Information and External Support

For Responsible Gaming concerns:

Email: support@wildwinz.com

Live Chat: Available via every page as a widget

External Support:

- [Gamblers Anonymous](#)
- [GamCare](#)
- [Gambling Therapy](#)
- [CyberPatrol](#)
- [GamBlock](#)

14. Policy History and Continuous Improvement

This Responsible Gaming Policy is reviewed annually, or more frequently if required by changes in legislation or operational practices. WildWinz is committed to adapting best practices and innovations in the field of responsible gambling to ensure optimal player protection.

Version: 1.2

Previous policy date: 01.12.2025

Version 1.2 updates the policy to align with CGA recommendations: added player access to betting history; detailed the rules for online activation of self-exclusion and the reactivation procedure after it ends; added a prohibition on excluding a player solely due to the size of their winnings.