

CONFIDENTIAL

RESPONSIBLE GAMING POLICY

Rapture B.V., a Company with registered address at
Kaya Richard J. Beaujon Z/N Landhuis Joonchi II Curacao,
registration number 156074, domain name: zaza.com
(hereinafter referred to as “**Company**”)

Stanislav Andrieiev, the
MLRO & Compliance
Officer

**Gouloud Mercedes
Hammoud** obo Guardian
Corporation Curacao B.V.,
the Statutory Director

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KEY INFORMATION

Approving Official(s):	Stanislav Andrieiev , the MLRO & Compliance Officer Gouloud Mercedes Hammoud obo Guardian Corporation Curacao B.V., the Statutory Director
Responsible Office:	Stanislav Andrieiev , the MLRO & Compliance Officer
Effective Date:	17.06.2025
Next Review Date:	17.06.2026

1. GENERAL PROVISIONS AND POLICY STATEMENT

1.1. Rapture B.V. has developed this Policy for providing of help and protection of players from any possible negative consequences of a passion for games.

1.2. The main reason for gambling is amusement and fun. We hope Players are recreating here with all these entertainments! We just want to be sure that everything is fine with them, and that Players don't take the game too seriously. Safe gaming, it's when you control the game, not vice versa.

1.3. This policy, therefore, focuses on informing and supporting Players. This policy is not an acknowledgement of any obligation to control, limit, prevent, or otherwise modify the gaming behavior of Players on Internet Gaming.

1.4. Gambling isn't advised if you're recovering from any form of dependence or if Players are under the influence of alcohol or any other substance, including some traditional drug. Players should always be mindful, that gambling is a form of recreation and shouldn't be viewed as an alternate source of profit or a way to recoup debt. Recognizing that Players may be elaborating a gambling problem is the first step to recovering control.

2. DEFINITIONS AND ABBREVIATIONS

2.1. **Company** — refers to Rapture B.V., a legally registered entity under the laws of Curaçao (registration no. 156074), located at Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Curaçao.

2.2. **GCB** — Gaming Control Board of Curacao.

2.3. **XCG** — Caribbean Guilder, the currency of Curaçao.

2.4. **Gambling or Gambling Game** — any online game posted on the Website that means playing a game of chance for a Prize. Game of chance includes (i) a game that involves both an element of chance and an element of skill, (ii) a game that involves an element of chance that can be eliminated by superlative skill, (iii) a game that is presented as involving an element of chance but does not include a sport.

2.5. **Customer** — an individual, who uses the Website and/or familiarizes himself with the provisions of the Website, these Policy and the provisions of other documents, and intends to register on the Website to participate in Gambling (acquire a Player status).

2.6. **Third Parties** — any individuals and/or legal entities other than the User and/or the Player, in particular, but not exclusively: family members, spouses, friends, partners, counterparties, creditors, service providers, agents, etc.

2.7. **Vulnerable Persons** — refers to individuals who may be at a heightened risk of experiencing negative consequences from gambling activities. These individuals may have diminished capacity to make informed decisions or control their gambling behavior due to various factors.

2.8. **Website** — the official websites of the Company, on which Customer may play the Gambling Games.

2.9. **RG** — Responsible Gaming.

2.10. In this Policy singular include the plural, and the plural include singular in cases of a need for interpretation.

3. BEHAVIORAL MONITORING AND EARLY INTERVENTION

3.1. We have a technical opportunity to flag clients who experience repeated losses are facing possible financial or mental health risks or who sound distressed and/or act abusively when communicating with our staff. These individuals were contacted by Customer Service to assess the situation and to discuss activating further self-control options.

3.2. We have a regular reminder to the players about effective limit tools such as spend limit, deposit limit, and session time limit and are given an option to personalize a limit-setting approach. Having a time-out to cool off temporarily is advisable for those who are predisposed to addictive behavior, experience changes in personal circumstances or exhibit signs of mental illness.

3.3. At zaza.com, we implement comprehensive behavior tracking to gain a full understanding of each player's interaction with our platform. This enables us to identify individuals who may be at risk and take timely, preventative action to minimize gambling-related harm.

3.4. Our monitoring includes, but is not limited to, the following key indicators:

- **Deposit and wagering behavior:** Sudden or unexplained increases in deposit amounts, wagering frequency, or duration of gaming sessions.

- **Failed transactions:** Repeated failed payment attempts due to insufficient funds.

- **Withdrawal reversals:** Multiple instances of cancelled withdrawal requests.

- **Extended gaming sessions:** Patterns of unusually long or continuous periods of play without logical breaks.

- **Customer support engagement:** Excessive or agitated communication, especially involving repeated bonus requests or emotional expressions.

- **Responsible Gaming tool manipulation:** Frequent setting, modifying, or removing of deposit or loss limits, or repeated use of the cooling-off feature.

- **Credit behavior:** Use of credit cards to their limit or beyond typical financial behavior.

- **Account circumvention attempts:** Efforts to create multiple accounts in order to bypass self-imposed or system-imposed limits.

3.5. This data is assessed in real-time and over time to support early intervention, ensure regulatory compliance, and promote safer gambling environments for all players.

4. PLAYER IDENTIFICATION AND INTERVENTION PROCEDURES

4.1. Development of Player Profiles

4.1.1. We compile and maintain detailed player profiles within our Player Account Management (PAM) system. Each profile includes key behavioral data such as:

- Frequency and length of gaming sessions
- Patterns in deposits and losses
- Notable changes in betting behavior
- History of self-exclusion or use of cooling-off periods
- Player communications or complaints related to gambling issues

4.2. Risk-Based Monitoring

4.2.1. To support player well-being and promote safer gambling practices, we have implemented a structured, tiered risk-based monitoring system. This approach ensures that the level of oversight and intervention is proportionate to each player's risk profile, based on their behavior and engagement patterns.

4.3. Risk Classification Levels

4.3.1. Players are continuously assessed and categorized into risk levels according to predefined behavioral thresholds and indicators:

- **Low Risk** – No clear signs of gambling-related harm; continued engagement with responsible gambling messaging is encouraged.
- **Moderate Risk** – Early warning signs or changes in behavior; warrants direct communication and guidance on available responsible gaming tools.
- **High Risk** – Strong indicators of problematic or uncontrolled gambling; requires immediate attention and potentially mandatory intervention measures.

4.4. Assessment Criteria

4.4.1. Risk levels are determined using a combination of behavioral data and transactional activity, including:

- Duration and frequency of gaming sessions
- Amount and regularity of deposits and losses
- Reversal or cancellation of withdrawal requests
- Repeated efforts to override deposit or session limits
- Expressions of emotional distress or complaints related to financial loss
- Use, avoidance, or manipulation of Responsible Gaming tools

4.4.2. This dynamic monitoring framework allows us to respond swiftly and appropriately to emerging risks, ensuring a safe and supportive gaming environment.

4.5. Corresponding Intervention Measures

Each risk level corresponds with specific actions:

Risk Level	Monitoring & Intervention
Low	Passive monitoring, display of RG messaging, offer of voluntary limits
Moderate	Personalized outreach, recommendation of RG tools, closer activity review
High	Mandatory limits, temporary suspension, or permanent exclusion; referral to support services if necessary

5. PLAYER NOTIFICATION

5.1. When a player is identified as exhibiting at-risk behavior, we will take prompt action to ensure appropriate support by:

- Informing the player in a timely and transparent manner
- Clearly outlining the available Responsible Gaming tools, including deposit limits, session time limits, cooling-off periods, and self-exclusion options

6. ESCALATION PROTOCOL

6.1. If concerning behavior continues or intensifies, we implement a structured, tiered intervention process:

- **Step 1:** Impose mandatory limits on deposits and/or session durations
- **Step 2:** Temporarily suspend the player's account to allow for a thorough risk assessment and further engagement
- **Step 3:** If the player's risk level remains high or problematic behavior persists, proceed with permanent account exclusion to prevent further harm

7. SELF-ASSESSMENT AND SUPPORT RESOURCES

7.1. Players have the right to access a detailed record of their betting and wagering history, including transaction timestamps, covering at least the previous six months. This information is available directly through their player account, without affecting any longer retention obligations required by applicable laws and regulations.

7.2. If a player requests records beyond the six-month period, these must be provided within 10 working days. In cases where this timeframe cannot be reasonably met, we may apply to the Curacao Gaming Authority (CGA) for an extension, which may be granted at the CGA's discretion based on the circumstances.

7.3. We encourage you to regularly reflect on your gaming behavior to ensure your gambling remains within healthy and manageable limits. A helpful resource is the 20-question self-assessment quiz provided by Gamblers Anonymous, available on their website at <https://gamblersanonymous.org/20-questions/>.

7.4. This brief quiz takes only a few minutes to complete and can offer valuable insight into the nature of your gambling habits.

7.5. In such case, the player will also need to contact Support which will ask a set of questions to ensure that the player is able to gamble within his own means, or he doesn't experience any other problems.

7.6. Also, we provide you with the CAGE Questionnaire (Adapted for Gambling). Please, answer the following questions honestly:

1. C – Cut Down: Have you ever felt you should cut down on your gambling?
2. A – Annoyed: Have people annoyed you by criticizing your gambling habits?
3. G – Guilty: Have you ever felt guilty about your gambling?
4. E – Eye-Opener: Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended

7.7. Please take into consideration that there are organizations in many countries that help to cope with addiction to the games, such as:

www.gamblingtherapy.org

www.gamblersanonymous.com

www.gamcare.org.uk

www.begambleaware.org

800gambler.org

8. BEHAVIOUR TRACKING

8.1. We undertake behavior tracking by holistically analysing the player's relationship with zaza.com, we can identify at-risk individuals and take proactive steps to prevent gambling-related harm.

8.2. Key monitoring factors include:

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- A pattern of Inexplicable extended play sessions.
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period.
- Players maxing out a credit card.
- Attempts to open multiple accounts to bypass deposit or loss limits.

9. COOLING-OFF AND SELF-EXCLUSION PROCEDURE

9.1. At zaza.com, players have access to two distinct Responsible Gaming tools designed to support safer gambling:

- **Cooling-Off:** A short-term, temporary break from gambling that the player can customize according to their needs.
- **Self-Exclusion:** A long-term, non-reversible exclusion from all gambling activities offered under the zaza.com license.

These options serve different purposes, and their key differences are outlined below:

Criteria	Cooling Off	Self-Exclusion
Wagering	Prohibited. Player selection – all or by vertical.	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or all operator brands – as selected	All brands/domains under the operator’s license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None
Antepost bets	Remain	Refunded/cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing messages	Opt-out given as an option	None. All messages blocked
Activation	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected options must be enabled within 24 hours.	Self-executed by player on the website. Very limited intervention by operator in this process. In exceptional cases, the player may request via email or chat and elected option must be enabled within 24 hours. Operator should have a plan to fully automate this process in short term.
Reactivation	Automatic	Player initiated

9.2. Cooling-Off Procedure

9.2.1. You have the option to initiate a **Cooling-Off period**, which temporarily restricts your access to gambling activities. This self-imposed break is designed to help you regain control and reflect on your gaming behavior. When activating a Cooling-Off period, you will be required to specify the following:

1. **Duration (mandatory)** – You may choose to suspend all wagering activity for one of the following predefined periods: 24 hours, 7 days, 1 month, or 3 months.
2. **Brand Scope** – Apply the restriction to either the current website or all websites operated under our brand.
3. **Vertical Scope** – Select to restrict all gambling activity or limit access to specific product verticals (e.g., Casino, Fixed Odds Betting, Poker, and other peer-to-peer games). For Casino, you may further specify “All Games” or “Slots Only.”
4. **Marketing Opt-Out (mandatory)** – You must opt out of marketing communications during the Cooling-Off period.

9.2.2. All selected restrictions take effect immediately and must be enforced according to your preferences.

9.2.3. For Cooling-Off periods of 1 or 3 months, a simple online verification may be used to confirm your decision (e.g., “You wish to cool off for one month. Please confirm.”). This step is presented in a neutral and non-intrusive manner.

9.2.4. During the Cooling-Off period:

- **Your account remains active**, but all gambling functionalities will be disabled.
- **Your funds remain available** and can be withdrawn at any time.
- **No marketing materials** will be sent if you have opted out, and you will not receive any bonuses, free play offers, or promotional incentives.

9.2.5. At the end of the Cooling-Off period, your account will be **automatically reactivated**, and no further action is required on your part.

9.3. Self-Exclusion Procedure

9.3.1. Preliminary Blocking

9.3.1.1. Players may initiate a temporary block on their account by contacting us through any available communication channel (e.g., live chat, email, or directly via their account manager). Upon receiving such a request—regardless of format—we will apply an immediate block to the account for a minimum of **24 hours** (referred to as *preliminary blocking*).

9.3.1.2. Following this action, the player will receive an email containing a self-exclusion form to complete. This form will request details such as the **desired exclusion period** and the **reason for the request**. Once the completed form is received, our Support Team will activate the self-exclusion for the duration specified by the player.

9.3.1.3. If the player does not complete the form, the account will be **automatically reactivated** once the preliminary blocking period ends.

9.3.1.4. Alternatively, players may access and complete the self-exclusion form **independently** without assistance from the Support Team.

9.4. Self-Exclusion Options

9.4.1. Players may choose to permanently exclude themselves from all gambling activity under the zaza.com license. The self-exclusion settings include:

1. **Duration** – Long-term self-exclusion periods available: **1 year, 3 years, 5 years, 10 years, or Lifetime.**
2. **Brand Coverage** – Applies to **all brands and domains** operated under the license.
3. **Activity Scope** – Full restriction on **all gambling products and verticals.**
4. **Marketing** – An **automatic opt-out** from all promotional and marketing communications.

9.4.2. We may implement a simple online verification step to confirm the player's decision to self-exclude. This check is intended to ensure the player is fully aware of their choice and its consequences. The messaging must remain neutral, e.g., *"You have chosen to self-exclude for 5 years. Please confirm."*

9.5. Lifetime Self-Exclusion and Account Access

9.5.1. Confirmation of Lifetime Self-Exclusion

9.5.2. To confirm a lifetime (permanent) self-exclusion, the player must complete an additional identity verification process to ensure the request is valid and intentional.

9.6. Account Access and Restrictions

- Access to an account under temporary self-exclusion cannot be restored until the selected exclusion period has fully expired. Once the designated period ends, account access will be **automatically reinstated** without further action required by the player.
- If any promotional or bonus offers expire during a temporary or preliminary block, **such offers cannot be reinstated or compensated** once the account is reopened.
- For accounts subject to **permanent (lifetime) self-exclusion**, access will **not be restored under any circumstances.**

9.7. Handling of Player Funds. In the case of permanent self-exclusion, we will make all reasonable efforts to return any remaining balance in the player's account to a verified payment method registered in the player's name, such as a bank account or approved e-wallet.

9.8. Immediate Enforcement

Self-exclusion measures take immediate effect and must be enforced strictly according to the player's selections.

Any wagers placed after a self-exclusion request but before the restriction becomes active must be voided, and the corresponding funds returned to the player.

9.9. Tournaments and Progressive Jackpots

- Players must complete any in-progress tournaments (e.g., poker tournaments) that began prior to the activation of the self-exclusion.
- Contributions to progressive jackpots made before self-exclusion remain valid; however, the player will no longer be eligible to participate in those jackpots once self-exclusion is in place.

Marketing and Communication

No direct marketing or promotional communications will be sent to players who are self-excluded, regardless of the duration or scope of their exclusion.

9.10. Reactivation and Post-Self-Exclusion Protocol

Once the self-exclusion period has expired, the player must submit a **written request**—via email or live chat—to have their account unblocked.

This request may be initiated either:

- In response to a login attempt following the end of the exclusion period, or
- Through direct, unsolicited written communication from the player using approved support channels.

Under no circumstances may reactivation be initiated by the operator through re-establishing contact with the player. Self-exclusion, once activated by the player, is **binding and irreversible** for the entire duration selected.

We retain records of all self-excluded accounts in accordance with applicable data retention laws and regulatory requirements.

Additionally, where technically feasible and permitted by regulation, we will block any **previously known payment methods** associated with a self-excluded player to prevent circumvention of self-exclusion measures.

10. COMPANY-INITIATED EXCLUSION

10.1. zaza.com reserves the right to initiate an account exclusion as a high-risk intervention measure in the following cases:

- The player exhibits signs of problematic or harmful gambling behavior
- The player is suspected of attempting or engaging in criminal activity through the platform

10.2. All operator-initiated exclusions are formally documented, with records securely maintained for a minimum of **five years**, in line with regulatory obligations. The **Curacao Gaming Authority (CGA)** may request access to these records at any time.

11. LIMITS

11.1. To support responsible gambling, zaza.com offers players the ability to set **deposit limits** to manage their spending. These limits may be customized based on the player's preferences and applied over daily, weekly, or monthly periods.

11.2. Deposit Limits

- Players can define the total amount they are permitted to deposit within a selected time frame (daily, weekly, or monthly).

- Once the limit is reached, no additional deposits can be made until the limit resets.
- Requests to **increase the strictness** of a limit (e.g., lowering the maximum deposit) take **effect immediately**.
- Requests to **decrease the strictness** (e.g., increasing the deposit cap) are subject to a **24-hour cooling-off period** before taking effect.
- Any existing or pending wagers placed **before the limit was applied** remain valid and are not retroactively affected.

Exceptions to Limits and Exclusions

While deposit limits and exclusions are applied immediately upon activation, certain exceptions apply in the case of **active wagers or ongoing gameplay**, including:

- Players actively participating in a poker tournament at the time a time-based limit is triggered
- Players with unresolved **ante-post bets** on future events

In these cases, the restriction will be applied **after** the completion of the relevant tournament, game, or betting event. Until then:

- The player may not initiate new wagers or enter new gameplay sessions
- The restriction applies to all future gambling activity not tied to the unresolved event

11.3. Once the active gameplay or wager concludes, the restriction (limit or exclusion) becomes fully enforceable across the account.

12. UNDERAGE PROTECTION

12.1. Minors should be safe

12.2. All we know is the global network nature: the internet provides its users with unlimited opportunities. Since the casino entertainments are widely available, we use all necessary measures to keep minors from playing and do not allow anyone under the age of 18 (or other age specifically prescribed by law in certain targeted jurisdictions) to open zaza.com account. Still, we encourage you to cooperate with us in children's protection.

12.3. We have implemented age verification procedures to ensure all participants meet the legal gambling age requirements. All players must verify their age by checking a designated box and uploading a valid government-issued document (such as a passport, national ID, or driver's license) before placing any bets. If we discover that a player is a minor, their account will be immediately closed.

12.4. Here are some easy things you can do, to create a safe environment and prevent your child from accessing the casino website:

- don't use auto-fill for login details, and keep them out of the children's reach;
- avoid playing on gambling websites, if there are children nearby you;
- if you use one device for all family members, as soon as you finish the gaming session, please log out;
- keep your payment cards safe and private;
- educate your child about all the risks connected with the use of the internet and gaming sites, particularly.

12.5. Learn more about parental tools that you can use on your devices. zaza.com recommends parents install a reputable filtering software system, for example, www.betblocker.org, www.netnanny.com, www.gamban.com, betblocker.org, gamblock.com or any other alternative.

- 12.6. We do not target underage players with our marketing and advertising. It is neither good business nor consistent with our personal and corporate values to attract underage players.
- 12.7. Any underage player who violates age restrictions and provides false or misleading information or documents regarding their true age may have all winnings confiscated and could face criminal prosecution.
- 12.8. We keep records of all age verification processes and their outcomes.

13. TRAINING AND STAFF READINESS

13.1. Our customer service and Responsible Gaming teams undergo training to handle player interactions professionally and effectively. The training includes:

- Identifying signs of gambling distress (e.g., agitation, aggression, or financial desperation).
- Conducting sensitive and structured conversations with at-risk players.
- Directing players to appropriate support resources and Responsible Gaming tools.

14. DIRECT PLAYER INTERACTION

14.1. We use manual pop-up notifications in response to concerning behaviors:

14.2. Financial Behaviors

- Frequently increasing deposit amounts within a short period.
- Making large or irregular deposits inconsistent with past behavior.
- Often requesting deposit limit increases or removing limits.
- Chasing losses by placing higher bets.
- Reversing or canceling withdrawal requests shortly after initiation.
- Complaining about financial losses or expressing desperation to recover money.

14.3. Time-Related Behaviors

- Long or continuous play sessions without breaks.
- Logging in during unusual hours (e.g., late at night or early morning).
- Rapid re-deposits within a single session.
- Playing multiple sessions in one day.

14.4. These notifications include a link for players to contact a trained Responsible Gaming professional.

When we observe behavior suggesting a player may be at risk, we initiate direct contact. This communication encourages the player to review the Responsible Gaming area and consider using available tools and support services.

15. REALITY CHECK

15.1. We implement a variety of reality check measures, including:

1. A real-time session timer visible at all times while the player is logged in.
2. A real-time clock set to the player's time zone.
3. Periodic pop-up reminders or prompts about session duration.
4. Player-activated reality checks.

15.2. Players can customize their reality check alerts to appear at specified time intervals. When triggered, the player must confirm they've read the message before continuing, with an option to end the session or keep playing. Customized reality checks temporarily suspend play and require confirmation before resuming, displaying information such as the time spent playing and showing winnings and losses during the session.

15.3. PLAYERS AT ALL TIMES REMAIN SOLELY RESPONSIBLE FOR THEIR GAMING BEHAVIORS. FOR THOSE PLAYERS WHO WISH TO RESTRICT THEIR GAMBLING, WE PROVIDE A VOLUNTARY SELF-EXCLUSION POLICY, WHICH ALLOWS THE PLAYER TO TAKE CERTAIN STEPS IN ORDER TO CLOSE THEIR ACCOUNT OR RESTRICT THEIR ABILITY TO PLAY GAMES ON THE WEBSITE FOR A DESIRED PERIOD.

16. CONTACT INFORMATION

16.1. For any questions regarding this policy, please contact: support@zaza.group or send a mail on the address: Kaya Richard J. Beaujon Z/N Landhuis Joonchi II, Willemstad, P.O. Box 6248, Curacao.

17. POLICY HISTORY

June 17, 2025	Policy update (Annual update)
December 01, 2024	Policy update (legal changes)
June 12, 2024	Policy update (legal changes)
May 28, 2024	Policy update (Annual update)
December 12, 2023	Policy update (legal changes)
May 20, 2023	Policy update (Annual update)
May 24, 2022	Initial Policy