

Luckland Group B.V.

RESPONSIBLE GAMING POLICY

Version 2.0
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1. Definitions

Company means Luckland Group B.V., operating with a Certificate of Operation number OGL/2024/494/0671 from the Curaçao Gaming Control Board.

Compliance Officer means a senior officer at management level and independent from the games' operations, responsible, among others, for Responsible Gambling.

CGA means Curacao Gaming Authority.

Cooling Off means a pre-determined period that can comprise hours, days or months which is set by the player during which time the player may not place any wagers whatsoever.

Games of Chance means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome.

LOK is the National Ordinance on Games of Chance law of Curacao.

Marketing, promotion and advertising refer to all resources, messages and media that promote the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns.

Mandatory Requirements are the basic elements of a Responsible Gaming policy that must be implemented by all operators. These elements must reflect the target markets and players of the operator.

Minor means any person under the age of 18.

Operator is a holder of a B2C license from the Curacao Gaming Authority (or holder of an Orange Digital Seal "Certificate of Operations")

Self-exclusion is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator.

Vulnerable Person is defined in the Clause I.I (h) of the LOK as:

(a) under eighteen years of age; (b) has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people; (c) has been banned from playing any Game of Chance either by force or at his or her own request; (d) has been declared bankrupt.

2. Introduction

2.1. Compliance Statement

Luckland Group B.V. (“Luckland Group” or “the Company”), being established in and governed by the laws of Curaçao, is committed to implementing robust policies as a responsible gaming enterprise operating in the country. The Company acknowledges the paramount importance of upholding the integrity of our Principles of Responsible Gaming (RG). At Luckland Group we believe that gambling should be a form of entertainment, not a way to make money or a source of harm, in line with the CGA’s commitment to fostering a safe, transparent, and fair gaming environment.

2.2. Legislative Framework and Guidances

With the issuing of the Responsible Gaming Policy for Licensed Operators of 17th April 2025 (Version 1.0), the local authorities in charge of the supervision of online gaming providers established that they need to integrate Responsible Gaming principles into their business models ensuring that gambling remains a form of entertainment. As a general principle no credit can be offered to players for the purpose of wagering. Adherence to this Responsible Gaming policy is considered a requirement under the LOK, and failure to comply will be addressed by the Curacao Gaming Authority (CGA) in accordance with its monitoring and enforcement procedures.

According to the CGA’s Guidance, the operators’ policy must include proactive steps and processes to protect Vulnerable Persons, promote responsible gambling along with mitigation or prevention of problem gambling behaviour. This includes:

- Clear Responsible Gaming policy that is easily available to the players.
- Provision of Responsible Gaming tools and information resources to players.
- Monitoring mechanisms must be in place to detect and address problematic gambling behaviour.
- Compliance with all regulatory reporting and auditing obligations.

Operators must upload their Responsible Gaming policy to the CGA portal for CGA evaluation.

2.3. Document Maintenance and Review

This Policy is designed to meet the legal requirements as outlined by the Curaçao Gaming Commission and to foster a culture of compliance within our organization. Regular reviews and updates will be conducted to adapt to evolving regulations and business needs. The maintenance and review of this document will take place annually.

2.4. Consequences of Non-Compliance

Violations of this policy may result in severe consequences, including disciplinary actions up to and including termination of employment for staff members found in breach of these regulations. Additionally, noncompliance can expose the casino to significant legal implications, including fines, sanctions, and potential criminal charges, which could severely impact our reputation and operational viability. Furthermore, failure to adhere to Responsible Gambling Mandatory Requirements may lead to increased

scrutiny from regulatory authorities, loss of licenses, and damage to our business relationships.

3. Mandatory Principles

The policy applies the following Responsible Gaming elements are mandatory for operational compliance with the CGA gaming license:

1. Age verification (Section 5)
2. Information accessibility (Section 6)
3. Player self-assessments (Section 7)
4. Behaviour tracking (Section 8)
5. Cooling-off Periods (Section 9.1)
6. Self-exclusion (Section 9.2)
7. Deposit limits (Section 10)
9. Training of employees (Section 11)
8. Consumer Advertising and Marketing (Section 12)
9. Enhanced Responsible Gambling measures (Section 13).

With reference to high Risk Business Models the Company understands that the CGA expects those operators whose business model is entirely or partially high risk, to provide a policy that suitably accommodates those elements of the business that are high risk. That is why, for example, Luckland Group does not accept cryptocurrency and sets very low deposit and withdrawal limits.

Finally, the Company appointed an individual for the Responsible Gaming role, as mandatorily required.

4. Appointment of the Responsible Gaming Person

In this policy the Company entrusts Ms. Daniela Pesci as the individual who fulfills the Responsible Gaming role in the organization, in her capacity of Compliance Officer. She is responsible for implementing and enforcing the Responsible Gaming policy and providing a report to the Company's management team, at least once every twelve (12) months as to the effectiveness of the policy and relevant procedures. This report shall provide recommendations to management as to any necessary operational or policy enhancements, ensuring that any material changes to the Responsible Gaming policy are reported to the CGA. She will:

Monitor to prevent marketing & advertising to knowingly and deliberately target vulnerable persons.

Verify that Terms & Conditions are visible and clear.

Collaborate with the designated suitably qualified Responsible Gaming operational staff in the Company's online business.

Luckland Group shall continuously monitor and enhance the effectiveness of these policies, procedures, and controls, ensuring that it maintains thorough documentation of its risk assessments, detailing all actions taken and the rationale behind them.

5. Age Verification

The Company acknowledges that according to Article 1.4(d) of the LOK, it is prohibited for the gambling licence holder to allow a minor the opportunity to participate in games of chance. Therefore, we implement rigorous age verification processes to ensure that all participants are of legal gambling age.

During the account registration process, we verify that the player is not a minor. This begins with self-attestation, where the player is required to enter their date of birth and confirm they are over 18 by selecting a designated checkbox and additional checks are carried out to gain sufficient certainty that the individual is not a minor. If at any point, notwithstanding the checks put in place, the Company becomes aware that the player is a minor, the account will be closed immediately. The civil law implications of this action must be considered. These may include the obligation to refund all deposits made by the player and the forfeiture of any winnings. The Company clearly communicates the reason for the account closure to the minor.

Regardless of the above, proof of age document submission and checks are subject to the CGA's Know Your Customer and AML policies and include at a minimum a government-issued valid ID check (such as a passport, national ID, or driver's license) on reaching specified thresholds and in any case prior to first withdrawal. Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification, may be undertaken by Luckland Group at its own discretion, but do not supersede the government-issued document requirement.

The Company maintain records of all age verification processes and their outcomes. These records are made available for regulatory review.

6. Information Accessibility

With respect to information accessibility Luckland Group maintains a prominent display of information regarding responsible gambling and gambling addiction in English, as well as the language of the target market, including information on the websites (quoted below) that gambling is prohibited for minors (under 18 years old). We offer a wide range of gambling treatment options in the target market, including local and/or international problem gambling support websites. We refer players to:

Gambling Therapy: www.gamblingtherapy.org

Gamblers Anonymous: www.gamblersanonymous.org

BeGambleAware: www.begambleaware.org

NCPG: www.ncpgambling.org

The main contents:

- Marketing & promotions (other than vulnerable persons)
- Age verification: prohibition of gambling by self excluded individuals and minors on the website
- Self-exclusion are functional and meet all requirements (offering at least 1-year Self-exclusion period to players)
- Mandatory Responsible Gaming message on all advertising
- Behaviour tracking and procedures for player identification and interventions must be functional
- Safer gambling tools.
- Deposit limits
- RG training of staff with customer interaction
- Cooling-off options are available to players
- Player self-assessments are available to players
- Exclusion by the Company is functional.

Other Responsible Gaming tools are necessarily based on risk profile: for example, Reality Check, time limit.

Our reality check measures are varied, and are implemented without compromising the user experience. However, if used they must be fit-for-purpose and measures include, but are not limited to:

1. A real-time session timer that remains visible at all times while the player is logged in.
2. A real-time clock in the player's time zone.
3. Periodic pop-up reminders or prompts about session duration.
4. Player-Activated Reality Checks. Players may have the option to set customized reality check alerts at specific time intervals. When triggered, it requires the player to confirm that they have read the message before resuming play and offers the option to end the session or continue playing.

Our customised Reality Checks must suspend play momentarily and require the players to confirm they have read the message before resuming play.

Custom messages:

- Clearly indicate how long the player has been playing.
- Display the player's winnings and losses during that period.

7. Player Self Assessment

The Company makes players able to access a detailed record of their wagering history and timestamps of transactions from their player account for at least the last six months, without prejudice to retention periods required by other applicable laws and regulations. Longer periods of transactions may be requested from us and provided within 10 working days. If this timeframe is not reasonably achievable given the circumstances, we will show the CGA, who may grant us an extension for a period it deems appropriate.

Our players are encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits by providing self-assessment tools that allow them to answer a series of questions designed to help identify potential problem gambling behaviours. These tools empower players to make informed decisions about their gambling activity. Alternatively, we provide players with access to scientifically recognized screening tools.

Luckland Group ensures that the Player self-assessments are made available to players.

8. Behaviour tracking

Our active monitoring detects signs of problematic gambling and clear intervention strategies for high-risk players in order to mitigate harm in line with article 1.4 (e) of the LOK, which prohibits the operator to give a person who, can reasonably be assumed to be a Vulnerable Person, the opportunity to play games of chance. By holistically analysing our player's relationship with with us, we can identify at-risk individuals and take proactive steps to prevent gambling-related harm.

The company follows the key monitoring factors outlined in the CGA's Responsible Gaming Policy, considering that it is recognised that any 'single/individual factor' shall not necessarily, by itself, classify a player as a potential gambling addict. A determination of problematic gambling behaviour may require the presence of multiple indicators occurring simultaneously and consistently.

Behaviour tracking is undertaken by our frontline staff (such as customer service representatives or player account managers) as they are in the best position to identify problematic behaviour through patterns and direct interactions. We adopt a structured process for flagging potential vulnerable gamblers that serves as a trigger for a more detailed behavioural analysis.

In addition to using frontline staff, Luckland Group uses technological tools such as gaming platform features, in-game tools, artificial intelligence (AI) and/or machine learning (ML).

An example of the key monitoring factors in use:

- 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.

The Procedures for Player Identification and Intervention:

We adopt a structured and documented process for responding to identified indicators of problem gambling. This process must include the following components:

- Player Profiling and Risk Assessment establishing and maintain player profiles incorporating relevant data points to assess individual risk levels.
- A risk-based approach must be adopted to determine the appropriate level of monitoring and intervention.
- All Responsible Gaming interactions, whether initiated by the player or the Company must be recorded

in the Player Account Management (PAM) system, along with the indicators of concern and any actions taken.

9.1 Cooling-off Periods

9.1. The Company offers players the option to activate a cooling-off period, during which they are temporarily restricted from gambling activity. The options regard:

1. Duration
2. Brand: (includes both the primary and any mirror domains of that brand)
3. Vertical
4. Marketing Opt-Out

The Duration and Marketing Opt-Out categories are mandatory. Inclusion of the Brand and Vertical categories are at the discretion of the Company.

- Duration Only: Restriction on all wagering activity for the period selected on the brand where the restriction was initiated.
- Duration, Vertical and Brand: Restrictions as selected, on brands selected, on verticals selected.

The player must select (by tick-box) their preference in each of these categories. Tick-boxes must not be pre-checked:

9.1.2 Duration Options

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

9.1.3 Vertical Options

9.1.4 Brand Options

- The current brand (website and/or app)
- All of the Company's brand

9.1.5 Marketing

- Opt-out.

9.1.6 Actions and Implementation

9.1.6.1 Timing

The restrictions take effect immediately and are enforced according to the player's selections. The Company does not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The Company adopted a verification check for the elected periods of 1 or 3 months for the player to confirm the decision to take a break from gambling during the selected cool-off period, and checks are online only and neutrally expressed e.g. “You wish to cool off for one month. Please confirm”.

9.1.6.2 Player Account

- Player funds remain accessible for withdrawal.
- Account remains active but with gambling features disabled.

9.1.6.3 Marketing and Communications

- Marketing materials must not be sent to players during their Cooling Off period if they have opted out.
- No bonuses, free play, or incentives may be offered during the cooling-off period.

9.1.7 Reactivation and Post-Cooling Off Protocol

- Accounts must be automatically reactivated after the selected Cooling Off period expires.
- No further action is required by the player.

9.2 Self-Exclusion

9.1. Luckland Group offers players the option to self-exclude from all gambling activity.

1. Duration: In accordance with LOK clause 5.4(2) we offer a long-term self exclusion periods of at least 1 year.

2. Brand: All brands/domains operated under Luckland Group’s license.

3. Vertical: All gambling activity

4. Marketing: Automatic opt-out

The player must select (by tick-box) their preference as to the duration of the self-exclusion period, all the other elements are automatic.

With regard to the self-exclusion process(s) we offer, at the very least the player must be able to initiate and complete the self-exclusion process fully online, without requiring email communication or our approval.

9.2.2 Duration Options

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

9.2.3 Actions and Implementation

9.2.3.1 Timing

The restrictions must take effect immediately and be enforced according to the player’s selections.

The civil law implications must be considered and may entail that any wagering that takes place following the self-exclusion request and prior to it being in effect must be voided and funds must be returned to the player.

The Company does not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

Luckland Group implements one simple verification check to ensure that the player is aware they have chosen to self-exclude and understands the consequences of this decision. The verification should be conducted online, and be brief and straightforward. The wording should be neutral, for example: "You have chosen to self-exclude for 5 years. Please confirm".

Player Account:

- Account is closed. Player can no longer log-in.
- The Company has robust measures in place to identify where reasonably possible duplicate accounts exist and prevent self-excluded individuals from creating new accounts under different credentials.
- The civil law implications must be considered. These may include that any ante-post bets must be voided and refunded, subject to AML/CFT regulations.
- The player must complete any tournaments (for example poker tournament) that is in-running at the time of the self-exclusion.
- Contributions to progressive jackpots that were made by the player through gameplay prior to the self-exclusion request remain in-situ, but the player is no longer entitled to participate with the jackpot after the self-exclusion is in effect.

9.2.3.2 Marketing and Communications

- No direct marketing or advertising can be sent to the player.

9.2.4 Reactivation and Post-Cooling Off Protocol

After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account. The written request can be prompted at the point of the player attempting to log in after the exclusion period has ended or by unprompted written communication by the player via the official customer support channels. Reactivation cannot be instigated by the Company re-commencing communications with the player. Activation of a self-exclusion by a player is irreversible and irrevocable for the duration of the exclusion period selected.

- The Company retains records of self-excluded in accordance with the applicable retention periods. Additionally, where possible, and in line with surrounding regulations, any payment method known directly by the Company used by a self-excluded player must be blocked for future use during any exclusion period to prevent circumvention of restrictions.

9.3 Operator-Initiated Exclusion

Luckland group excludes a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour.
- The player attempts or engages in criminal activities through our platform.

Luckland Group does not exclude players solely on the basis of the amount of their winnings.

Operator-initiated exclusions must be formally documented, and records are kept for at least five years.

The CGA may request these records at any time.

10. Deposit Limits

The Company offers the player with tools to control their gambling activity by setting deposit limits. Players can set these limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

10.1 Deposit Limits

Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).

- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.
- If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.
- Any resolved or unresolved wagers made prior to the deposit limit being set in place remains unaffected regardless of the limits set.

Exceptions to Limits and Exclusions:

- A limit or exclusion has the potential to affect active wagering – including, but not limited to:
- A time limit set when a player is active in a poker tournament.
- A limit or exclusion when a player has an unresolved ante-post bet on a future event.

In these situations, the restrictions as outlined above must be honoured immediately with the exception of the active gameplay or wager(s). Upon completion of the active gameplay, relevant tournaments, wagers or events the restrictions apply. Prior to the event's completion, no further wagering is permitted (for example a player cannot enter another tournament or engage in other gameplay while the current tournament remains in progress, or a player may not place any wagering while an ante-post bet remains unresolved).

11. Training of Employees

Luckland Group trains Customer Service and Responsible Gaming staff to handle player interactions professionally and effectively.

Training covers, at least:

- Recognizing 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.

12. Consumer Advertising and Monitoring

Luckland Group does not engage in irresponsible advertising.

- Targeting of Vulnerable Groups – Marketing including visual content must not directly target Vulnerable People.
- No Portrayal of Gambling as an Investment – Advertising must not promote gambling as a way to achieve financial success or solve financial difficulties.
- No Misrepresentation of Skill vs. Chance – Marketing must not suggest that skill can influence the outcome of games that are purely based on chance.
- No Emotional Manipulation – Advertising must not portray gambling as a substitute for financial, emotional, or mental well-being
- Marketing materials must not feature minors or depict them engaging with gambling content.
- No Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
- No Encouragement of Unrelated Harmful Behaviours and there must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.

Bonus Conditions:

- Bonuses and promotions are communicated transparently with clear terms and conditions.
- The Company does not use bonuses to encourage excessive gambling.

Third Party Involvement:

- The Company is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors social media influencers, including wordings and visual representations, where the influencers actions and/or statement are paid placement or advertisement.
- The Company makes any contracted third-party aware of their Responsible Gaming policy and require them to adhere to it.
- Responsible Gaming Messaging – All advertising must include a clearly visible responsible gaming message or slogan.
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13. Enhanced Responsible Gambling Measures

At Luckland Group, Enhanced Responsible Gambling measures are based on higher levels of risk which the Company may detect.. Higher levels of risk may come out due to our business model being inherently high risk or because of a disproportionately high number of players being assessed to be at risk either due to our own led checks or the numbers of players choosing to exclude/cool-off. These are possible scenarios the Company is equipped to identify, analyze and manage if/when they may occur.

13.1 Internet Filtering Tools

To further prevent underage gambling, the Company reminds adults that they should take pre-cautions when sharing devices with minors - such as safeguarding usernames, passwords, and payment details.

The Company, upon need, may also consider links to third-party software that can help restrict access to gambling websites.

13.2 Direct Player Interaction

- The Company may adopt automatic or manual pop-up notifications in response to concerning behaviours. These notifications must include a link for the player to contact a trained Responsible Gaming professional.
- When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the Company initiates direct contact. This communication must advise the player to review the Responsible Gaming area and consider using the available tools and support services.

At Luckland Group B.V. the above direct interaction is actioned through the following contacts:

Email: support@casinomidas.com

'Phone and Live Chat': Accessible via our websites

13.3 Other Limits

In line with Luckland's Group B.V.'s target player and/or market, other limits may be considered, including loss limits, time limits or wager limits.