

Responsible Gaming Policy

Top X Go N.V.

Company Registration Number: 165952

Domains: www.top-x-go.com

Director: Ecorpp Management N.V.

Compliance Officer: Derek Hendriks

1. Introduction

Top X Go N.V. (“the Company”) recognizes that gaming, while a popular form of entertainment, carries potential risks when not conducted responsibly. We firmly believe that we have a duty of care to our players, regulators, employees, and society to create a safe, transparent, and supportive gaming environment.

Responsible gaming is not only a legal and regulatory requirement under the Curaçao Gaming Authority (“CGA”), but also a central element of our corporate values. We strive to ensure that gaming remains a positive recreational activity, free from exploitation or harm, and we are committed to protecting those who may be vulnerable to gambling-related risks.

This Responsible Gaming Policy (the “Policy”) establishes the principles, practices, and procedures adopted by the Company to minimize the risks associated with gaming, ensure compliance with regulatory standards, and promote a culture of fairness, accountability, and integrity across all our operations.

2. Scope of the Policy

This Policy applies to:

- All products and services provided by Top X Go N.V. through its domains (www.top-x-go.com).
- All employees, contractors, and partners involved in the provision of gaming services.
- All interactions with customers, whether through online platforms, marketing activities, or customer support channels.

The Policy is binding on all staff members and forms part of our internal governance framework.

3. Objectives

The objectives of this Policy are to:

1. Protect players from the adverse consequences of problem gambling.
2. Provide effective tools and resources to empower players to control their gaming activity.
3. Prevent underage and unauthorized access to gaming services.

4. Ensure that marketing and promotional activities are conducted ethically and responsibly.
5. Establish monitoring mechanisms to detect and address risky behavior.
6. Maintain ongoing dialogue with regulators, industry bodies, and support organizations.
7. Foster a corporate culture that prioritizes player welfare alongside commercial goals.

4. Principles of Responsible Gaming

Our approach to responsible gaming is guided by the following principles:

- **Transparency:** Rules, terms, and conditions must be clear and accessible.
- **Protection:** Safeguards must be in place for minors and vulnerable groups.
- **Prevention:** Early identification of risk behaviors is prioritized over reactive measures.
- **Support:** Players who experience difficulties must be guided towards professional help.
- **Accountability:** The Company and its employees are accountable for ensuring compliance and upholding this Policy.
- **Continuous Improvement:** Practices and technologies must evolve with industry standards and regulatory expectations.

5. Player Self-Control and Protection Tools

To empower players to manage their gambling behavior, the Company provides a comprehensive set of tools, including but not limited to:

5.1 Deposit Limits

Players can establish daily, weekly, or monthly deposit limits at any time. Once set, these limits cannot be increased until the expiry of the relevant period, although players may request to lower their limits immediately.

5.2 Loss Limits

Players may define a maximum allowable loss over a chosen timeframe. This ensures that players cannot lose more than the amount they have predetermined.

5.3 Wagering Limits

Restrictions can be applied to total wagers within a specified period, preventing excessive betting.

5.4 Session Time Limits

Players can limit the duration of their gaming sessions. Once the time limit is reached, the session will automatically terminate.

5.5 Cooling-Off Periods

Players may suspend their accounts temporarily (e.g., 24 hours, 7 days, or 30 days). During this period, they cannot access gaming services.

5.6 Self-Exclusion

For players requiring a longer break, the self-exclusion tool allows account suspension for a defined or indefinite period. During exclusion, marketing communications are stopped, and accounts cannot be reopened until the period expires.

6. Monitoring of Player Behavior

The Company employs advanced monitoring systems and manual reviews to identify potentially problematic behavior. Indicators include:

- Frequent and escalating deposits.
- Extended late-night or irregular gaming sessions.
- Attempts to override previously set limits.
- Expressions of financial distress during customer support interactions.
- Evidence of “chasing losses” (continuing to play after repeated losses in an attempt to recover them).

When such patterns are identified, the Company will:

1. Contact the player directly to express concern.
2. Provide clear information on available self-control tools.
3. Suggest or enforce temporary limits or exclusions.
4. Refer the player to external professional support services.

7. Prevention of Underage Gambling

The Company enforces a strict **18+ policy**. Measures include:

- Verification of age and identity during account registration (KYC procedures).
- Use of third-party identity verification tools.
- Prominent placement of “18+” symbols across websites and platforms.
- Encouragement of parents and guardians to install parental control software (e.g., Net Nanny, CyberPatrol).

Any account suspected of underage use is immediately suspended and investigated.

8. Support and Assistance

Top X Go N.V. is committed to supporting players at risk of problem gambling. Beyond internal support, we provide links and referrals to external organizations specializing in gambling-related assistance:

- **GamCare** – www.gamcare.org.uk
- **Gamblers Anonymous** – www.gamblersanonymous.org

- **Responsible Gambling Foundation** – www.responsiblegambling.org
- **BeGambleAware** – www.begambleaware.org

Contact details for these organizations are displayed prominently on our website, as well as in account settings and communications relating to responsible gaming.

9. Advertising and Marketing Standards

All advertising and promotional activities shall comply with the following standards:

- Marketing materials shall never target minors or vulnerable groups.
- Promotions shall not be misleading or create unrealistic expectations of winning.
- Bonuses and offers shall always include transparent terms and conditions.
- Marketing shall include responsible gaming messages and links to support organizations.
- Affiliates and third-party partners must adhere to the same standards, with compliance monitored by the Company.

10. Employee Training and Responsibilities

All employees undergo mandatory training on responsible gaming at induction and at least annually thereafter. Training covers:

- Understanding gambling addiction and behavioral indicators.
- Use of monitoring and reporting tools.
- Procedures for handling self-exclusion and limit requests.
- Communication skills for interacting with at-risk players.
- Escalation protocols and reporting obligations.

The Compliance Officer, Derek Hendriks, ensures training programs remain up to date and effective.

11. Record Keeping and Data Protection

All records relating to responsible gaming measures (including self-exclusion, limits, and monitoring reports) are securely maintained for a minimum of five (5) years in compliance with data protection laws and regulatory requirements.

Data is processed in line with the General Data Protection Regulation (GDPR) and Curaçao legislation, ensuring confidentiality, integrity, and lawful use of customer information.

12. Governance and Oversight

- The Board of Directors bears ultimate responsibility for the oversight of this Policy.
- The Compliance Officer is responsible for daily implementation, monitoring, and reporting to the CGA.
- Independent audits and regulatory inspections may be conducted to assess compliance.

13. Review and Continuous Improvement

This Policy shall be reviewed at least annually, or more frequently if required by regulatory updates or operational needs. The review process includes:

- Assessment of the effectiveness of current tools and procedures.
- Consultation with regulators, employees, and industry experts.
- Incorporation of technological innovations (e.g., AI-based monitoring).
- Updates to reflect evolving industry standards and player behavior patterns.

The Company is committed to continuous improvement, recognizing that responsible gaming is an evolving area requiring proactive adaptation.

14. Conclusion

Top X Go N.V. considers responsible gaming to be a cornerstone of sustainable business operations. By prioritizing player protection, supporting those at risk, and maintaining transparent and ethical practices, we ensure compliance with the Curaçao Gaming Authority while fulfilling our social responsibility.

Through this Policy, the Company reaffirms its pledge to safeguard its customers, promote fairness, and uphold the highest standards of responsible gaming in all areas of operation.