

EDJOWA-GAMING N.V.

## **RESPONSIBLE GAMBLING POLICY**

**Document / Revision History**

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| <b>EDJOWA-GAMING N.V.</b> | <b>RESPONSIBLE GAMBLING POLICY</b> |
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**Change control**

| <b>Revision #</b> | <b>Date</b> | <b>Written by/<br/>Responsible<br/>Officer</b> | <b>Approved by</b>         | <b>Description of Changes</b> |
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## 1. THE POLICY

This Responsible Gambling Policy (“**Policy**”) of EDJOWA-GAMING N.V. (“**Company**”) is hereby adopted to ensure full compliance with the mandatory standards, principles, and procedures established by the Curacao Gaming Authority (“**CGA**”), as detailed in the CGA Responsible Gaming Policy (Version 1.0, dated 17 April 2025) (“**CGA RG Policy**”). This Policy shall be binding upon all departments, personnel, business partners, and contractors engaged in the provision, promotion, management, and regulation of games of chance under the authority of a valid license issued by the CGA.

The Company recognizes its legal and ethical duty to mitigate gambling-related harms, prevent underage and vulnerable person participation, and promote a safe, fair, and responsible gambling (“**RG**”) environment.

## 2. DEFINITIONS

For the purposes of this Policy, the following definitions shall apply:

“**Minor**” shall mean any natural person under the age of 18 years, in accordance with the provisions of the CGA RG Policy and applicable laws of Curaçao. Minors are strictly prohibited from engaging in any form of gaming or gambling activity offered by the Company.

“**RG tools**” shall mean any technical, procedural, or system-based feature made available by the Company—whether on its website, mobile application, or affiliated platforms—for the express purpose of preventing gambling-related harm, supporting player self-regulation, and ensuring compliance with regulatory obligations concerning player protection. Such tools shall include, but are not limited to:

- Deposit, loss, wager, and session limits
- Time-out and self-exclusion functionalities
- Reality checks and activity notifications
- Access to behavioral analytics and self-assessment instruments
- Display of account history and gambling expenditure summaries
- Information and links to external support services

Unless otherwise expressly defined herein, all capitalized terms used in this Policy shall have the **same meaning as ascribed to them in Section 1 of the CGA RG Policy**.

## 3. RG GOVERNANCE

### 3.1. Appointment and Continuity of the RG Officer

**Timeline: 31.05.2025.**

The Company shall appoint a suitably qualified individual to serve as the RG Officer (“**RGO**”). The appointed individual shall possess demonstrable expertise, professional training, and relevant experience in regulatory compliance, player protection, and RG frameworks.

The RGO shall be vested with the authority and autonomy necessary to effectively implement, monitor, and enforce this Policy across all operational departments of the Company.

In the event of a vacancy, the Compliance Officer of the Company (excluding any officer concurrently responsible for Anti-Money Laundering and Counter Financing of Terrorism (“**AML/CFT**”) obligations shall be appointed as the interim RGO without undue delay, in order to ensure regulatory continuity and mitigate any compliance or operational gaps.

The RGO shall act as the primary point of contact with the CGA on matters pertaining to RG compliance and player protection obligations.

### 3.2. Annual RG Compliance Report

The RGO shall prepare and submit to the Company's Board of Directors or senior management an annual RG Compliance Report. The report shall include, at a minimum:

- (i) An evaluation of the effectiveness of the current RG framework, including identification of strengths, deficiencies, and risk areas;
- (ii) Quantitative and qualitative data relating to the usage of RG tools, incidents of self-exclusion, and behavioral monitoring outcomes;
- (iii) Recommendations for enhancements to procedures, technology, employee training, or player communication strategies.

The report shall be completed and submitted within 12 months of the previous report and shall form the basis of the Company's internal audit and review processes concerning RG obligations.

### 3.3. Summary

- (i) **RGO:** To be appointed by 31.05.2025, with relevant expertise and operational authority; interim replacement required in case of vacancy.
- (ii) **Regulatory Oversight:** RGO serves as the primary contact with the CGA and ensures company-wide enforcement of RG policies.
- (iii) **Annual Compliance Report:** RGO must submit a yearly RG report evaluating tool usage, risk areas, and recommending policy improvements.

## 4. IMPLEMENTATION OF RG MEASURES

### 4.1. Timeline for Implementation

The Company shall implement the RG measures detailed in the table below in strict accordance with the Implementation Schedule mandated by the CGA. Where necessary, the Company shall revise the table to ensure continued alignment with any updated regulatory directives, enforcement guidelines, or statutory obligations issued by the CGA or any other competent regulatory authority.

| <i>Measure</i>                                                                                                                                                                                                                                             | <i>Section in the CGA RG Policy</i> | <i>Deadline</i> |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------------------|-----------------|
| Marketing & advertising cannot knowingly and deliberately target vulnerable persons                                                                                                                                                                        | 12                                  | 30.04.2025.     |
| Terms & Conditions should be visible and clear                                                                                                                                                                                                             | 6.3                                 | 31.05.2025.     |
| RG policy: The document must be submitted to the CGA                                                                                                                                                                                                       | 2                                   | 31.05.2025.     |
| Management team to be aware of RG policy and its implementation                                                                                                                                                                                            | 2                                   | 31.05.2025.     |
| Designate suitably qualified RG tasks to a person within the operator's online business                                                                                                                                                                    | 2                                   | 31.05.2025.     |
| Information Accessibility: Prominent display of information regarding RG and gambling addiction in English, as well as the language of the target market, including information on the website that gambling is prohibited for minors (under 18 years old) | 6                                   | 31.05.2025.     |
| Gambling support referral: A prominent display of gambling treatment options in the target market, including local and/or international problem gambling support websites                                                                                  | 6                                   | 31.05.2025.     |
| Marketing & promotions (other than vulnerable persons)                                                                                                                                                                                                     | 12                                  | 30.09.2025.     |
| Age verification: prohibition of gambling by self-excluded individuals and minors on the website                                                                                                                                                           | 5.1<br>5.2                          | 30.09.2025.     |
| Self-exclusion option must be functional and meet all requirements (offering at least 1-year Self-exclusion period to players)                                                                                                                             | 9.2                                 | 30.09.2025.     |
| No credit offering for wagering                                                                                                                                                                                                                            | 2.1                                 | 30.09.2025.     |
| RG message on all advertising (mandatory)                                                                                                                                                                                                                  | 12                                  | 30.09.2025.     |
| Behaviour tracking and procedures for player identification and interventions must be functional                                                                                                                                                           | 8                                   | 31.03.2026.     |
| Safer gambling tools. Deposit limits                                                                                                                                                                                                                       | 10.1                                | 31.03.2026.     |
| RG training of staff with customer interaction (i.e. Customer support and VIP at a minimum and marketing)                                                                                                                                                  | 11                                  | 31.03.2026.     |
| Cooling-off option must be available to players                                                                                                                                                                                                            | 9.1                                 | 31.03.2026.     |
| Player self-assessments must be available to players                                                                                                                                                                                                       | 7                                   | 31.03.2026.     |
| Exclusion by the operator must be functional                                                                                                                                                                                                               | 9.3                                 | 30.09.2026.     |

|                                                                                            |    |             |
|--------------------------------------------------------------------------------------------|----|-------------|
| Other RG tools as necessary based on risk profile: for example, Reality Check, time limit. | 13 | 30.09.2026. |
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The Company acknowledges that failure to comply with the specified deadlines may result in regulatory sanctions, including but not limited to administrative penalties, reputational harm, or suspension of license, and therefore commits to ensuring timely, comprehensive, and verifiable implementation of all mandated measures.

## 4.2. Minimum Technical Standards for RG Tools

**Timeline: 31.05.2025.**

In accordance with the CGA RG Policy, the Company shall ensure that all RG tools meet or exceed the minimum technical and operational standards required by the CGA.

Specifically, all RG tools must be:

- Accessible via both website and mobile application, without exception, to ensure universal availability to all registered players regardless of device.
- Available in English and in the primary language(s) of the Company's core target market(s), as determined by market penetration data and player demographics.
- Operational in real time with minimal latency, ensuring that player interactions with RG tools, such as setting limits or initiating timeouts, are reflected immediately and without undue technical delay.

The Company affirms that these RG tools shall be developed, tested, and maintained in accordance with recognized industry standards for security, usability, and data integrity.

## 4.3. Minimum Online Information Accessibility

**Timeline: 31.05.2025.**

The Company shall ensure that all legally required information regarding RG, gambling risks, and player protection is prominently and continuously accessible across its online platforms, including websites and mobile applications, in full compliance with the CGA's regulatory standards and jurisdictional requirements.

### 4.3.1. RG Section

The Company shall maintain a clearly identifiable and continuously accessible RG section, made available in English and the official language(s) of the target market. In case of any discrepancy, the English version shall prevail.

The RG section shall:

- Provide clear, easy-to-understand information to support informed player decisions;
- Contain direct access to all key RG tools;
- Include educational content regarding gambling risks, addiction signs, and harm minimization;
- Display contact options for RG-related support, including email and live chat with the Company's support team.

### 4.3.2. Homepage & Footer Visibility

To ensure ongoing player access and visibility, the following shall be implemented:

- A clearly visible and functional link to the RG section must be present:
  - On the homepage of the website and mobile application;
  - Within the footer of all pages;
  - Within the help/support section and transactional workflows (e.g., deposit confirmations).
- The footer shall include:
  - A clear visual notice that gambling is prohibited for individuals under 18;
  - The Company's name and registered address;
  - The CGA license number;

- A statement confirming CGA oversight of the Company's operations;
- A link to the RG section;
- The CGA digital seal;
- Direct links to gambling support organizations, including GamCare, GambleAware, Gamblers Anonymous, and local services where available.

#### 4.3.3. *Terms & Conditions Integration*

- The RG section must be explicitly referenced within the Terms & Conditions;
- Terms & Conditions must be:
  - Clearly written and provided in English and the language(s) of the primary target market;
  - No more than 1-click away from the homepage;
  - Accessible:
    - At registration;
    - Before deposits or wagers;
    - Via footer link on all pages.

#### 4.3.4. *Gambling Support Resources*

The Company shall provide prominent access to reputable gambling support and treatment services, including:

- Local and international support services;
- Contact details and descriptions of available help (e.g., helplines, counseling, exclusion programs);
- Guidance for seeking help via the RG section and key areas of the platform.

#### 4.3.5. *Placement & Ongoing Review*

- All required information must be visible without requiring account registration;
- Placement must be consistent and intuitive across the platform;
- Content shall be reviewed periodically to ensure relevance, accuracy, and alignment with updates to the CGA RG Policy.

### 4.4. Availability of Self-Assessment Tools

**Timeline: 30.03.2026.**

In furtherance of the Company's obligation to promote informed and RG behavior, and as required under the CGA RG Policy, the Company shall integrate at least 1 scientifically validated, industry-recognized gambling behavior self-assessment tool within the RG section of its websites and mobile applications.

Acceptable tools may include, but are not limited to:

- The CAGE Questionnaire.
- The GA 20-Question Tool.
- Any other instrument explicitly approved or endorsed by the CGA for self-assessment purposes.

The self-assessment tool shall be presented in a user-friendly and non-intrusive format, and must be:

- Voluntarily accessible, without requiring player authentication or affecting gameplay.
- Confidential and anonymous, ensuring that responses and outcomes are not stored, linked to the player gaming account, or used for any commercial, promotional, or disciplinary purposes.
- Educational purpose, with the sole function of raising player awareness and prompting voluntary consideration of RG behaviors.

While results shall not affect the player's gaming account standing, access, or available services, players whose responses suggest potential gambling-related harm shall be immediately presented with tailored informational content and directed to available support resources, including professional helplines and intervention services.

The Company shall monitor usage of the tool for aggregate data insights (without storing personal data) to evaluate effectiveness and report high-level trends to the CGA upon request.

#### 4.5. Summary

- (i) **RG Tool Standards:** RG tools must function in real time, be available on all platforms (web/mobile), and support multiple languages including English and target market languages.
- (ii) **Online RG Information:** Clearly display 18+ info, RG info, Terms & Conditions, underage prevention messages, and support referrals across all platforms—accessible without login and in user-appropriate languages.
- (iii) **Self-Assessment Tool:** A CGA-approved, anonymous self-assessment tool must be integrated for player awareness, without storing personal data or affecting account status.

### 5. AGE VERIFICATION & PREVENTION OF UNDERAGE GAMBLING

#### 5.1. Obligations & Verification Procedures

**Timeline: 30.09.2025.**

The Company is under a strict legal and regulatory obligation to prevent access to gambling services by Minors.

Accordingly, the Company shall expressly prohibit the registration, deposit, wagering, or participation in any gambling-related activity by Minors, and shall implement robust age verification procedures to enforce this prohibition.

All account registrations shall be subject to a mandatory, multi-tiered age verification protocol, including, at a minimum:

- (i) Self-declared date of birth, provided at the point of registration;
- (ii) Mandatory checkbox confirming the player has reached the age of majority, which shall be a condition precedent to player gaming account creation; and
- (iii) Documentary verification of identity and age, which shall be required:
  - Prior to the first withdrawal, and/or
  - Immediately upon reaching any threshold limits specified under the Company's AML/CFT Policy, whichever occurs first.

Verification documentation shall include a valid government-issued photo identification document, such as a:

- National passport;
- Official local/national identification card; or
- Valid driver's license.

Alternative or supplementary verification methods (e.g., biometric scans, electronic databases, or third-party identity verification services) may be employed in addition to, but not as a replacement for, the primary ID requirement.

#### 5.2. Response to the Identification of a Minor

In the event that a registered player is discovered to be a Minor, whether during or after the registration process, the Company shall take the following immediate remedial actions, without limitation:

- (i) Immediate suspension and permanent closure of the player's gaming account;
- (ii) Full refund of all deposits made by the Minor;
- (iii) Forfeiture of all winnings;
- (iv) Notification to the Minor of the reason for the gaming account suspension and closure, along with a reference to the applicable legal provisions and regulatory obligations.

The Company shall maintain a secure and confidential internal record of any identified incidents of underage gambling or attempted registration by a Minor, for the sole purpose of preventing future re-registration or access.

Such records shall be stored in accordance with applicable data protection laws and internal compliance protocols.

The Company also shall evaluate all such findings as part of its internal compliance and risk assessment processes, and shall actively seek and implement appropriate technical and procedural measures to restrict further attempts at access, including but not limited to:

- Blocking of duplicate accounts;
- IP address flagging; and
- Account name and credential monitoring.

### 5.3. Summary

- (i) **Strict Prohibition:** The Company strictly prohibits access to gambling services by Minors and enforces this via mandatory, multi-tiered age verification at registration and before withdrawals or AML/CFT thresholds.
- (ii) **Verification Requirements:** Players must provide self-declared age, confirm majority via checkbox, and submit government-issued photo ID. Supplementary methods like biometric, or database checks may be used.
- (iii) **Response to Minors:** If a Minor is identified, the gaming account is suspended and closed, deposits refunded, winnings forfeited, and appropriate notices issued.
- (iv) **Preventive Actions:** Incidents are recorded confidentially; technical measures such as IP blocking, credential monitoring, and duplicate account checks are used to prevent future access.

## 6. PLAYER PROTECTION TOOLS

### 6.1. Deposit Limits

**Timeline: 31.03.2026.**

In compliance with the CGA RG Policy, the Company shall provide all registered players with the ability to voluntarily establish deposit limits on their gaming accounts, as a core harm-minimization measure.

Players shall be permitted to set deposit limits over the following timeframes, at a minimum:

- Daily limits
- Weekly limits
- Monthly limits

These limits shall be readily accessible via the RG section of both the Company's websites and mobile applications and shall be designed to ensure ease of use and clarity.

The following rules govern the adjustment of deposit limits:

- (i) Any request to increase the severity of a deposit limit shall be implemented immediately upon submission, without delay and without the option to reverse the change during the applicable limit period;
- (ii) Any request to decrease the severity of a deposit limit shall be subject to a mandatory cooling-off period of no less than 24-hours before it may take effect.
- (iii) All requests to adjust deposit limits shall be:
  - Clearly logged and timestamped in the player's account history;
  - Accompanied by a confirmation prompt to ensure informed consent;
  - Subject to system-level enforcement to prevent circumvention, including via duplicate or alternate accounts.
- (iv) The Company shall ensure that once a deposit limit is in place, no deposits exceeding that limit may be processed, whether through single or multiple transactions within the applicable time period.

The deposit limit functionality shall be developed in accordance with the minimum technical standards set forth by the CGA and shall operate in real time with minimal latency.

The Company acknowledges that any failure to properly enforce deposit limits may be deemed a material breach of its regulatory obligations and shall be subject to internal review and remediation.

## 6.2. Time-Based Controls

**Timeline: 30.09.2026.**

In accordance with the CGA RG Policy, the Company shall provide players with a range of time-based controls to foster RG practices. These controls shall include session timers, reality checks, and log-out notifications, all of which shall be fully customizable by the player to suit individual preferences.

At a minimum, the following time-based controls shall be implemented:

- (i) Reality Checks: The Company shall enable reality checks to be provided at player-defined intervals (e.g., hourly, bi-hourly), displaying the player's time spent, the balance, and a prompt to encourage a pause or self-reflection.
- (ii) Session Timers: The Company shall provide a default hourly session alert that notifies the player of the total time spent playing. The alert shall include the following information:
  - The total time spent in the current session;
  - The current account balance;
  - An option to log out immediately.
- (iii) Log-Out Notifications: Players shall receive a notification alerting them to log out, at a minimum, when a session exceeds pre-determined durations or when session limits are approaching.
- (iv) Customizability: Players shall be afforded the option to adjust the frequency and format of session alerts, reality checks, and log-out notifications. However, any customization shall not override the Company's minimum legal obligations and default settings, which shall be in place to ensure player protection.

The Company shall ensure that these time-based controls are:

- Readily accessible within the player's gaming account settings;
- Operational in real-time, with no delay in notification or enforcement; and
- Enforced by the system to prevent circumvention or non-activation of the player's selected settings.

The Company shall ensure that no player is able to bypass these notifications or disable them for more than a specified period (e.g., 24 hours), to prevent misuse or disregard of RG practices.

## 6.3. Cooling-Off and Self-Exclusion

In compliance with the CGA RG Policy, the Company shall provide players with the ability to voluntarily initiate cooling-off periods and self-exclusion measures to support RG practices. The Company shall ensure that these measures are fully accessible, transparent, and enforced in accordance with all applicable legal and regulatory requirements.

2 key mechanisms must be made available to players at all times via the RG section:

- Cooling Off: A short-term, temporary restriction from gambling activities, which the player can customize.
- Self-Exclusion: A long-term, irrevocable exclusion from all gambling activities under the Company's license.

Players must be clearly informed of the differences between the 2 options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable.

|                          | <b>Cooling-Off</b>                                                                                                                                                                                                 | <b>Self-Exclusion</b>                                                                                                                                                                                                                                                                                    |
|--------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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 the selected option must be enabled within 24 hours. The operator should have a plan to fully automate this process in the short term. |
| Reactivation             | Automatic                                                                                                                                                                                                          | Player initiated                                                                                                                                                                                                                                                                                         |

### 6.3.1 Cooling-Off Period

**Timeline: 31.03.2026.**

Players shall have the option to initiate a cooling-off period lasting between 24 hours and 3 months.

During such a period:

- No wagering shall be permitted on the player's account, and all related gaming functions shall be temporarily suspended.
- Players shall be given the option to select the duration of the cooling-off period, with a minimum term of 24 hours and a maximum term of 3 months.
- No reactivation of account functionality shall be possible during the cooling-off period unless the player has voluntarily requested an extension, or a new cooling-off period, with appropriate safeguards in place to ensure player consent.

### 6.3.2 Self-Exclusion

**Timeline: 30.09.2025.**

The Company shall provide players with the ability to voluntarily self-exclude from gambling activities for a period of no less than 1 year, with the option to select a longer exclusion period if desired.

Self-exclusion shall be governed by the following provisions:

- Irrevocability:** Once initiated, self-exclusion shall be irrevocable for a minimum term of 1 year, during which the player will be excluded from all gambling activity across all brands and platforms operated under the Company's license.
- Self-Initiation:** The self-exclusion process shall be fully self-initiated by the player online, through the Company's websites and mobile applications. The player must explicitly confirm their self-exclusion request before it becomes effective.
- Confirmation of Exclusion:** The player shall receive a confirmation notification upon the successful initiation of self-exclusion, detailing the exclusion period, the consequences of the exclusion, and available support services.
- No Incentives or Bonuses:** During the self-exclusion period, the Company shall prohibit the offering of any promotional incentives or bonuses to the self-excluded player. The Company shall ensure that no promotional communications are sent to the player during the exclusion period.
- Reactivation Process:** Upon the expiry of the self-exclusion period, the player shall not be automatically reactivated. Any request to reactivate the player's account shall require written confirmation from the player, including a cooling-off period of no less than 24 hours before reactivation can take place. The Company shall ensure that no player is automatically reactivated without this request, in order to mitigate risks of impulsive behavior.

- (vi) **Internal Monitoring and Enforcement:** The Company shall employ system-level controls to ensure that self-exclusion is enforced across all platforms and brands under its license, preventing any attempt by the player to bypass the exclusion. Duplicate account detection and identity verification procedures shall be in place to prevent circumvention of self-exclusion.

#### 6.4. Operator-Initiated Exclusion

**Timeline: 30.09.2026.**

The Company reserves the right to initiate the exclusion of a player from its platform where there are clear behavioral indicators, evidence of criminal misuse, or concerns arising from staff interactions that suggest the player is engaging in activities that contravene the Company's policies, regulatory requirements, or the integrity of the platform.

Operator-initiated exclusions shall be governed by the following provisions:

- (i) **Grounds for Exclusion:** The Company may exclude a player if any of the following conditions are met:
  - **Behavioral Indicators:** Evidence of gambling patterns or behaviors that suggest the player may be engaging in compulsive gambling, fraud, money laundering, or other prohibited activities;
  - **Staff Interactions:** Reports or observations from Company staff indicating suspicious or unethical conduct by the player, including but not limited to attempts to circumvent self-exclusion or manipulate the system;
  - **Evidence of Criminal Misuse:** Any indication that the player is engaging in or attempting to engage in illegal activities, including but not limited to fraud, the use of stolen payment methods, or other criminal behavior.
- (ii) **Enforcement Across Platforms:** The exclusion shall apply across all platforms and brands operated under the Company's license, ensuring that the player cannot circumvent the exclusion by re-registering or accessing alternative services under a different account.
- (iii) **Player Notification:** The player shall be notified of the exclusion in a clear and professional manner, including the reasons for the exclusion, any relevant evidence or behavioral observations, and information on how they can appeal the decision if applicable.
- (iv) **Appeal Process:** The Company shall provide a formal appeal process for players who wish to challenge the operator-initiated exclusion. The process must be clearly communicated to the player at the time of exclusion and provide for a timely and fair review of the decision by an independent committee or senior compliance officer.
- (v) **Ongoing Monitoring and Compliance:** The Company shall continue to monitor any player who has been excluded, and enforce the exclusion across all channels, ensuring no circumvention of the exclusion through new account creation, false identification, or manipulation of the system.
- (vi) **Documentation and Retention:** All operator-initiated exclusions must be clearly documented, including a detailed explanation of the reasons for the exclusion and any supporting evidence, such as communication records, transaction history, or behavioral analysis. Documentation must be retained securely for a minimum period of 5 years, in compliance with applicable regulatory requirements and data retention policies.

#### 6.5. Summary

- (i) **Deposit Limits:** Players can set daily, weekly, or monthly deposit limits. Increases apply immediately; decreases require 24-hour delay. Limits are enforced in real time and logged.
- (ii) **Time-Based Controls:** Includes session timers, reality checks, and log-out alerts. Players can customize, but default safeguards remain. Tools must function in real time.
- (iii) **Cooling-Off & Self-Exclusion:**
  - **Cooling-Off:** 24 hrs–3 months; cannot be reversed.
  - **Self-Exclusion:** Minimum 1 year, irrevocable, across all Company's platforms. No reactivation without the player's written request and applies with a 24-hour delay.

- (iv) **Operator-Initiated Exclusion:** Permitted based on risk indicators or misuse. Applies across all Company's platforms. Players are notified and may appeal. All actions are documented and retained.

## 7. MONITORING & INTERVENTION

### 7.1. Behavioural Monitoring

**Timeline: 31.03.2026.**

The Company shall implement a comprehensive Behavioral Monitoring Program designed to proactively identify patterns of play and detect activity indicative of problematic or high-risk gambling behavior. This monitoring shall form an integral component of the Company's RG Framework and shall operate in accordance with the CGA RG Policy and other applicable regulatory standards.

#### 7.1.1. Scope of Monitoring

The Company shall continuously monitor player activity for behavioral red flags, including but not limited to:

- Uncharacteristic or rapid increases in deposit amounts;
- Frequent or repeated cancellation of withdrawal requests;
- Excessively long or uninterrupted session durations;
- High frequency of changes to RG tools or limits;
- Multiple failed or suspicious attempts to create duplicate or alternate accounts;
- Sudden shifts in gameplay patterns, wager size, or betting frequency;
- Indicators of distress in player communications or support interactions.

#### 7.1.2. Methodology

Behavioral monitoring shall be conducted through a dual-layered approach:

1. Automated Detection Systems: The Company intends to deploy algorithmic and AI-driven tools capable of real-time pattern recognition and risk scoring. These systems shall flag accounts for further review when defined thresholds or combinations of red flags are met.
2. Manual Oversight and Intervention: Trained RG personnel shall perform manual reviews of flagged accounts, conduct follow-up assessments, and escalate concerns in accordance with internal escalation protocols.

#### 7.1.3. Staff Training and Review Protocols

All staff responsible for monitoring or responding to behavioral triggers shall receive regular training in:

- Recognizing indicators of gambling harm;
- The use and interpretation of monitoring tools;
- Procedures for responsible intervention and escalation.

Behavioral monitoring reports shall be subject to periodic audit and internal compliance review to ensure effectiveness, consistency, and alignment with applicable data protection and regulatory standards.

#### 7.1.4. Data Handling and Retention

All data collected through behavioral monitoring shall be processed in compliance with applicable data protection laws, including but not limited to the General Data Protection Regulation (GDPR) or any relevant data protection regulations in Curacao. Records of monitoring activities flagged incidents, and subsequent actions shall be retained for a minimum of 5 years.

### 7.2. Intervention Protocols

In accordance with the CGA RG Policy, the Company shall establish and maintain a clearly defined Intervention Protocol to be activated upon detection of player behavior indicative of potential gambling-related harm. These protocols ensure timely, proportionate, and structured engagement with affected individuals, while balancing regulatory obligations and player welfare.

### 7.2.1. Trigger and Assessment

Where behavioral monitoring identifies red-flag activity, the case shall be reviewed by trained RG personnel. Based on the severity, frequency, and context of the flagged behavior, the Company shall determine the appropriate level of intervention.

### 7.2.2. Tiered Response Framework

Intervention measures shall be carried out in a tiered and proportionate manner, escalating in accordance with the player's risk profile and responsiveness:

1. Initial Outreach. The Company shall initiate contact using neutral, factual, and non-judgmental messaging. Communications shall be made via the player's registered communication channel and may include:
  - Notification of observed behaviour;
  - Educational content on RG;
  - Information on available RG tools.
2. Recommendation of RG Measures. Players shall be encouraged to engage with RG tools, including deposit limits, time-outs, reality checks, and self-assessment questionnaires. Guidance shall be clear and actionable.
3. Escalated Intervention. If risk indicators persist or intensify, the Company shall escalate the intervention, which may include:
  - Direct contact by a RGO;
  - Temporary account restrictions;
  - Mandatory cooling-off periods;
  - Suspension or enforced exclusion from play in accordance with Section 6.4.
4. Involuntary Exclusion. In cases of acute risk, or where the player is deemed unable or unwilling to engage safely, the Company reserves the right to enforce operator-initiated exclusion, effective immediately across all brands and platforms under the Company's license.

### 7.2.3. Documentation and Record-Keeping

All intervention steps, including communications, risk assessments, actions taken, and player responses—shall be accurately logged and timestamped in the Player Account Management system. These records shall be:

- Maintained for a minimum period of 5 years;
- Made available to competent regulatory authorities upon lawful request;
- Subject to regular audit and compliance review.

## 7.3. Summary

### (i) Behavioral Monitoring:

- **Scope of Monitoring:** Continuous tracking of behavioral red flags, such as deposit spikes, cancelled withdrawals, excessive session durations, frequent RG tool changes, multiple account attempts, and changes in gameplay patterns.
- **Methodology:** Combination of automated detection systems (AI-driven tools) and manual oversight by RG personnel.
- **Staff Training:** Regular training for staff in recognizing gambling harm indicators and using monitoring tools.
- **Data Handling & Retention:** Compliance with data protection laws (GDPR, Curacao) and retention of records for 5 years.

### (ii) Intervention Protocols

- **Trigger & Assessment:** Behavior flagged by monitoring is reviewed by RG personnel, with appropriate intervention levels determined.
- **Tiered Response Framework:**
  - Initial outreach with educational content and RG tool recommendations.
  - Escalated interventions if risks persist, including temporary restrictions or mandatory cooling-off periods.

- Involuntary exclusion in cases of acute risk or non-compliance.
- **Documentation & Record-Keeping:** All interventions and player responses logged for 5 years and available to regulators.

## 8. ADVERTISING & MARKETING

### 8.1. Prohibited Practices

**Timeline: 30.04.2025.**

In accordance with the CGA RG Policy and any applicable advertising codes, standards, or regulations, the Company shall ensure that all advertising and promotional activities are conducted in a socially responsible manner.

The Company shall strictly prohibit the creation, dissemination, or sponsorship of any marketing material—whether online or offline:

- (iii) Targets or appeals to minors or vulnerable persons, including the use of characters, themes, language, or imagery likely to resonate with individuals under the age of majority, or those with cognitive or behavioral vulnerabilities;
- (iv) Misrepresents gambling as a means of financial success, social advancement, or income generation, including implying guaranteed winnings, risk-free play, or portraying gambling as a solution to financial problems;
- (v) Contains explicit or overtly sexualized content, or uses nudity, suggestive themes, or adult content to attract attention or incentivize participation;
- (vi) Utilizes testimonials, influencers, brand ambassadors, or social media figures in a manner that exploits social pressure, peer influence, or aspirational messaging to encourage participation in gambling activities;
- (vii) Promotes or encourages prolonged, impulsive, or emotionally-driven gambling, including messaging that implies urgency (“bet now”), fear of missing out (FOMO), or glorification of continuous play.

The Company shall ensure that all third-party affiliates, marketing partners, and platform operators acting on its behalf are contractually bound to comply with the above standards and shall monitor such activities for ongoing compliance. Violations shall result in immediate suspension of campaigns and potential termination of partner agreements.

### 8.2. Mandatory Messaging

**Timeline: 30.09.2025.**

All advertising and promotional materials disseminated by or on behalf of the Company, whether digital, print, broadcast, or in-person, shall prominently and clearly include the following RG disclosures:

- (i) A visible and legible RG message, such as “*Gamble Responsibly*” or an equivalent phrase approved by the CGA or other competent authority;
- (ii) A direct link to the RG section of the Company’s websites and mobile applications, clearly identified and easily accessible from the material;
- (iii) A reference to at least one recognized independent support organization, such as GamCare, GambleAware, or an equivalent authority appropriate to the Company’s target market(s).

These elements shall be designed and placed to ensure maximum visibility and legibility, and may not be obscured by design elements, animation, or formatting. The Company shall ensure consistency across all formats and platforms, including third-party placements and social media content.

### 8.3. Third-Party Responsibility

All marketing affiliates, brand ambassadors, influencers, and sponsored content creators engaged by or acting on behalf of the Company shall be contractually bound to comply with the terms of this Advertising & Marketing Policy.

The Company shall:

- Incorporate explicit contractual clauses requiring third parties to adhere to RG standards and applicable advertising regulations;
- Conduct ongoing monitoring and compliance reviews of third-party content to ensure adherence to these obligations;
- Retain the right to suspend or terminate any third-party arrangement immediately upon discovering non-compliant activity;
- Maintain a registry of active marketing partners, including their jurisdiction of operation and applicable oversight history.

Failure by any third party to comply with these obligations shall constitute a material breach of contract, entitling the Company to pursue all available remedies, including but not limited to termination, indemnification, and regulatory self-reporting where legally required.

### 8.4. Summary

- (i) **Prohibited Practices:**
  - Bans marketing targeting vulnerable groups, misleading claims, explicit content, and impulsive gambling promotion.
  - Ensures third-party partners comply, penalties apply for violations.
- (ii) **Mandatory Messaging:** All ads must include RG messages, a link to RG resources, and a reference to support organizations, ensuring clarity and consistency.
- (iii) **Third-Party Responsibility:** Requires affiliates and influencers to follow RG standards, with monitoring and penalties for non-compliance.

## 9. ENHANCED RG MEASURES

### 9.1. High-Risk Player Segments

Where the Company's internal Risk-Based Assessment Procedures identify a concentration or disproportionate volume of activity from high-risk player segments, including but not limited to:

- VIP or high-stakes players;
- Players transacting primarily via cryptocurrency or high-risk payment methods;
- High-frequency, high-duration, or high-velocity gambling behaviour;

The Company shall implement Enhanced RG Protocols tailored to mitigate elevated risk. These may include, without limitation:

- (i) Mandatory deposit or session limits, regardless of prior player preferences or opt-outs;
- (ii) Direct contact from trained RG personnel, with documented outreach and follow-up;
- (iii) Temporary suspension of gameplay, pending player interaction, RG assessment, or third-party intervention;
- (iv) Mandatory re-evaluation of account status, including potential downgrade from VIP programs or revocation of high-stakes privileges.

All interventions applied under this provision shall be proportionate to the risk presented, logged in the Player Account Management system, and subject to audit by the Company's Compliance and RG teams. These procedures shall be reviewed no less than annually for efficacy and alignment with regulatory standards.

## 9.2. Internet Filtering Tools

As part of its commitment to player protection and harm-prevention, the Company shall actively promote the use of reputable third-party internet filtering and parental control tools, particularly in environments where access by minors or vulnerable persons is reasonably foreseeable.

### 9.2.1. Purpose and Scope

The objective of this measure is to empower players and guardians to implement device-level restrictions that limit access to gambling-related content, thereby extending protection beyond the Company's platform.

### 9.2.2. Minimum Standards

At a minimum, the Company shall:

- (i) Provide clear, prominent links and guidance regarding reputable filtering software—such as BetBlocker, Gamban, or other tools approved by the CGA or equivalent regulatory authorities—within the RG section of its websites and mobile applications;
- (ii) Include references and recommendations to such tools in all self-exclusion confirmation communications and other relevant RG-related player correspondences;
- (iii) Encourage voluntary adoption of filtering solutions as a proactive and preventative measure, especially in connection with temporary play suspensions, self-exclusion, or suspected harm-related behaviour.

### 9.2.3. Monitoring and Review

The Company shall remain informed of material developments in internet filtering technology and maintain an updated list of recommended tools, subject to periodic review. The effectiveness and accessibility of this feature shall be audited as part of the Company's broader RG compliance review framework.

## 9.3. Summary

- (i) **High-Risk Players:** Enhanced RG protocols (e.g. limits, direct outreach, temporary suspension) are triggered for VIPs, crypto users, or players showing high-risk behavior, with all actions logged and audited.
- (ii) **Mandatory Safeguards:** Measures may override player preferences to ensure responsible play, including reassessment of account or VIP status.
- (iii) **Internet Filtering Tools:** The Company promotes third-party software (e.g. BetBlocker, Gamban) to help restrict gambling access, especially for minors or vulnerable users.
- (iv) **Ongoing Review:** All enhanced measures and tools are reviewed regularly to ensure effectiveness and compliance with regulatory standards.

## 10. STAFF TRAINING & ENFORCEMENT

### 10.1. Mandatory Training Requirements

#### **Timeline: 31.03.2026.**

The Company shall ensure that all customer-facing personnel, including but not limited to those operating within Customer Support/ RG, VIP/Account Management, and Marketing departments, undergo mandatory RG training as follows:

- Initial training must be completed within 45 days of commencement of employment;
- Refresher training shall be conducted at least annually or more frequently where role-specific updates or regulatory changes so require.

Training programs shall be administered by qualified internal or third-party professionals and shall be documented in the employee's personnel file.

## 10.2. Training Content

All RG training modules must include, at a minimum:

- (iv) Recognition of gambling-related harm and behavioral risk indicators, including early warning signs and high-risk engagement patterns;
- (v) Appropriate protocols for player engagement, including non-confrontational communication, escalation paths, and referral to RG resources;
- (vi) Operational knowledge and application of the Company's RG tools, player account management systems, and intervention protocols.

## 10.3. Disciplinary Enforcement

Any material breach of this Policy, including failure to complete mandatory training or neglect in applying RG procedures, shall be treated as a compliance violation and may result in disciplinary measures, up to and including suspension, reassignment, or termination of employment in accordance with the Company's internal HR policies and applicable labor laws.

The Company shall maintain a training and compliance register, available for inspection by regulatory authorities upon request.

## 10.4. Summary

- (i) **Mandatory Training:** All customer-facing staff must complete RG training within 45 days of hiring and undergo annual refreshers; training is documented and role-specific.
- (ii) **Training Content:** Covers identifying gambling harm, responsible player interaction, and correct use of RG tools and systems.
- (iii) **Enforcement:** Failure to comply with training or RG procedures is a disciplinary matter, potentially leading to suspension or termination.
- (iv) **Compliance Oversight:** A training register is maintained and made available to regulators upon request.

# 11. POLICY REVIEW

This Policy shall be reviewed at least annually following the submission of the RGO report, and additionally whenever warranted due to internal developments, changes in the Company's business, regulatory updates, or upon request by the CGA.

## 11.1. Periodic Review Obligations

This Policy shall be subject to formal review and evaluation by the Company no less than once every 12 months following the submission of the RGO annual report, or more frequently where circumstances warrant such review.

## 11.2. Triggering Events for Interim Review

In addition to the annual review, this Policy shall be immediately reviewed and, where necessary, amended in response to any of the following events:

- (i) Operational or Structural Changes: Any material alteration in the Company's business model, operational structure, product offering, target market, technological platform, or corporate ownership that may affect the application or adequacy of the Policy;
- (ii) Internal Incidents or Regulatory Breaches: Any incident, breach, or identified deficiency in the implementation of RG controls that reveals potential weaknesses in the existing framework;

- (iii) **Legislative or Regulatory Change:** Any modification, enactment, or repeal of applicable laws, regulations, or official guidance issued by the Curacao Gaming Authority (CGA) or any other competent authority having jurisdiction over the Company's gaming operations;
- (iv) **Regulatory Request:** Upon formal written request from the CGA or any other competent regulatory authority requiring a review, revision, or clarification of the Company's RG framework.

### 11.3. Amendment Procedure

Any proposed amendment to this Policy shall be documented in writing, specifying the rationale for the change and its legal or operational basis. Material amendments shall be:

- (i) Subject to prior review and approval by the Company's executive management and/or board of directors;
- (ii) Notified to the CGA within 10 days of approval, where such amendment constitutes a material change to the Company's RG framework or operations.

### 11.4. Version Control and Record-Keeping

The Company shall maintain a version-controlled archive of all iterations of this Policy, including records of each review, amendment, and associated approvals. All such records shall be retained for a minimum of 5 years and made available for inspection by the CGA upon request.

### 11.5. Summary

- (i) **Annual and Ad Hoc Reviews:** The Policy must be formally reviewed at least once every 12 months following the RGO report, and more frequently if triggered by internal developments or regulatory requirements.
- (ii) **Trigger Events:** Interim reviews are required in response to business changes, internal incidents, regulatory updates, or at the request of the CGA.
- (iii) **Amendment Process:** All material changes must be documented, approved by senior management, and notified to the CGA within 10 days if applicable.
- (iv) **Record-Keeping:** A version-controlled archive of all Policy iterations and amendments must be maintained for a minimum of 5 years for regulatory inspection.

## 12. CONTACT INFORMATION

The contact person for matters relating to this Policy is:

Name, surname: Aleksandr AVERICHEV  
 Email: legal@planbet.com

Any questions, requests for clarification, or concerns regarding this Policy should be directed to the contact person(s) listed above.