

EDJOWA-GAMING N.V.

Suspension and Closure of Player Accounts Procedure

Document / Revision History

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Change control

Revision #	Date	Written by/ Responsible Officer	Approved by	Description of Changes
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1. PURPOSE AND LEGAL BASIS

EDJOWA-GAMING N.V. (“**Company**”) acknowledges and affirms its statutory, regulatory, and ethical obligations to mitigate gambling-related harm, to prevent access to gambling by underage or vulnerable individuals, and to ensure the provision of a secure, transparent, and socially responsible gambling (“**RG**”) environment.

This procedure constitutes a binding internal governance instrument and sets forth the formal process for the suspension, restriction, and closure of player accounts maintained on the Company’s online gaming platform(s). It is adopted in full conformity with the following regulatory instruments and frameworks:

- The Curaçao Gaming Authority (“**CGA**”) license conditions;
- The National Ordinance of the 20th of December 2024 Containing Rules concerning Games of Chance (National Ordinance on Games of Chance) (“**LOK**”);
- The CGA Responsible Gaming Policy (Version 1.0, dated 17 April 2025) (“**CGA RG Policy**”);
- The Regulations for the combating of Money Laundering, the Financing of Terrorism and Proliferation of weapons of mass destruction (applicable to Curaçao casinos and providers of other online games; January 2025) (“**CGA AML policy**”);
- The Company’s published General Terms and Conditions as accessible via its online gaming website(s) (“**T&C**”).

2. PRINCIPLES

This procedure is implemented in accordance with the following core principles, which underpin the Company’s governance and operational conduct:

1. Player Protection: To proactively identify, prevent, and mitigate risks associated with problem gambling, fraudulent behavior, underage participation, and other forms of regulatory non-compliance.
2. Due Process and Procedural Fairness: To ensure that all account suspensions or closures are based on clearly established evidence, executed in a manner that is lawful, proportionate, and transparent, and communicated to the player in a timely fashion.
3. Regulatory Alignment and Compliance: To ensure full adherence to all applicable obligations arising under Anti-Money Laundering and Counter-Financing of Terrorism (“**AML/CFT**”) framework, RG provisions, data protection regulations, and broader consumer protection standards.
4. Auditability and Record Integrity: To guarantee that every decision to suspend or close a player account is fully documented, traceable, and capable of withstanding internal audit, external regulatory inspection, or legal challenge.

3. GROUNDS FOR SUSPENSION OR CLOSURE

The Company reserves the right, and in certain circumstances is legally obligated, to suspend or permanently close a player’s account where one or more of the following grounds are identified. Each ground shall be assessed with due regard to applicable legal, regulatory, and contractual obligations.

3.1. RG Grounds

Pursuant to the LOK and the CGA RG Policy, account restrictions or termination shall be imposed in the following cases:

- The player voluntarily requests a cooling-off period or self-exclusion, including temporary or indefinite exclusion from all gambling services.
- The player exhibits observable signs of problematic gambling behavior, including but not limited to:
 - Persistent chasing of losses,
 - Notable escalation in session duration or frequency,
 - Aggressive or emotionally unstable communication with support teams.
- The player fails RG checks or breaches pre-set behavioral limits.

Further procedural and evidentiary details may be found in the Company’s RG Policy, which is fully incorporated by reference herein.

3.2. AML/CFT and KYC Compliance Grounds

Pursuant to the LOK and the CGA AML Policy, account restrictions or termination shall be imposed in the following cases:

- Where Know Your Customer (“KYC”) documentation is incomplete, expired, falsified, or otherwise unreliable.
- Where transactional behavior is indicative of money laundering or financial crime, including:
 - Structuring (splitting transactions to avoid thresholds),
 - Use of third-party payment instruments or proxy identities.
- Where the player is positively flagged by automated or manual screening, including matches on:
 - Sanctions lists,
 - Politically Exposed Persons (“PEPs”),
 - Adverse media databases.
- Where a lawful order is issued by the CGA, the Financial Intelligence Unit of Curaçao (“FIU”), or any other competent authority, requiring immediate account freeze, limitation, or closure.

Further procedural and evidentiary details may be found in the Company’s AML Policy, which is fully incorporated by reference herein.

3.3. Breach of the T&C Grounds

Pursuant to the T&C, player accounts may be suspended or terminated where any material breach is identified, including but not limited to:

- Operating multiple player accounts to circumvent promotional or bonus limitations.
- Engaging in bonus abuse, including exploitation of system vulnerabilities, coordinated betting, or value extraction schemes.
- Accessing the platform from prohibited jurisdictions, or using VPNs, proxies, or emulators to mask true location or identity.
- Engaging in activities that undermine game integrity, including:
 - Collusion with other players,
 - Use of automated bots or unauthorized software,
 - Tampering with or exploiting software behavior.

4. SUSPENSION PROCEDURE

The following stepwise procedure shall be implemented upon the identification of a legitimate trigger for account suspension, whether arising from automated detection, internal review, or third-party reporting.

Step 1 – Trigger Identification and Case Registration

- Potential risk indicators are identified via the Company’s automated surveillance systems (if/when available), manual reviews, or external alerts (e.g., regulator, payment provider, affected third party).
- A risk classification (e.g., RG, AML, T&C violation) shall be recorded.

Step 2 – Provisional Suspension Action*

Upon classification of the incident as sufficiently material, the account shall be placed in a “Suspended – Under Review” status.

Without limitation, the following immediate restrictions shall be imposed:

- Deposits: Disabled.
- Withdrawals: Frozen.
- Gameplay and bonus participation: Suspended.
- Account access (login): Blocked where the nature of the risk justifies full lockout (e.g., suspected identity theft, multiple accounts, regulatory breach).

** Notwithstanding the above, this Step 2 shall not apply to suspension or closure actions arising from RG or AML/CFT matters. In such cases, the Company shall strictly follow the procedures, timelines, and controls as detailed in the Company’s RG Policy and/or the Company’s AML Policy, which may provide for immediate, temporary, or permanent restrictions independent of this general suspension procedure.*

Step 3 – Formal Notification to Player

Within 24 hours of account suspension, the player shall receive a formal written notice transmitted via registered email and, where technically feasible, via user interface notification.

The communication shall contain:

- The effective date of suspension.
- A clear description of the reason(s) for the action, including reference to the applicable clause(s) of the T&C and/or legal basis.
- A list of remedial actions or documentation required to initiate review and potential reinstatement.
- A description of the resolution timeline, including response and review periods, and the right to appeal (if applicable).

5. REVIEW AND RESOLUTION TIMELINE

The following procedural timelines shall govern the resolution of account suspensions:

Stage	Action	Timeline
1	Player submits requested information, documents, or clarification	Within 14 calendar days from date of notification
2	Compliance team reviews case, verifies information, and determines outcome	Within 5 business days of complete receipt
3	Final outcome communicated to player in writing	Within 3 business days following decision

Failure by the player to respond within the prescribed timeframe may result in automatic escalation to permanent account closure, subject to further internal and/or regulatory review.

6. OUTCOMES

Upon completion of the internal review process, the Company shall render a final decision concerning the status of the player account, resulting in one of the following outcomes:

6.1. Reinstatement

Where, following investigation, the Company determines that no regulatory breach, contractual violation, or ongoing risk exists:

- The player account shall be fully reinstated with all prior functionalities restored.
- The player shall receive a formal written confirmation of reinstatement, including a summary of the findings and assurance of service continuity.

6.2. Extended Suspension

Where the investigation is inconclusive or the underlying risk remains unresolved—particularly in cases involving ongoing inquiries by law enforcement, the FIU and/or the CGA (as applicable):

- The account shall remain in a “suspended” status for a further defined period.
- The player shall be notified in writing of:
 - The basis for the continued suspension,
 - Any additional steps or conditions required for review, and
 - Whether the matter has been referred or escalated to the CGA, FIU, or other competent body.

6.3. Permanent Closure

A permanent and irrevocable account closure shall be executed under the following circumstances:

- A confirmed violation of applicable law, license condition, or regulatory policy (including but not limited to money laundering, fraud, or the operation of a re-registered self-excluded account).
- A material and/or repeated breach of the T&C.
- A formal instruction or enforcement action issued by the CGA, FIU, or other competent body.
- A strategic or legal necessity to withdraw access due to regulatory risks or jurisdictional restrictions.

Consequences of Permanent Closure:

- The player shall receive written notification of the closure, including the factual and legal basis, effective date, and relevant consequences.
- Any available withdrawable funds shall be returned to the player unless:

- Such funds are proven or suspected to derive from fraudulent, abusive, or unlawful conduct,
- There exists a regulatory freeze or hold under the direction of the CGA, FIU, or other competent body.
- Non-withdrawable funds, including unused bonuses, promotional credits, or loyalty rewards, shall be automatically forfeited, in line with the T&C and applicable legal framework.

7. APPEALS AND ADR PROCESS

- A player subject to account suspension or closure shall have the right to submit a written appeal to the Company within 30 calendar days of receiving the formal notice of action.
- All appeals shall be reviewed by a designated Customer Support Supervisor and/or the Company's Responsible Gaming Officer ("RGO").
- Where the matter remains unresolved or the player contests the outcome, and where applicable under the CGA RG Policy and/or the T&C, the player shall be referred to the appointed Alternative Dispute Resolution ("ADR") entity, as listed on the Company's website and recognized by the CGA, subject to the applicable legal framework.
- ADR outcomes shall be final and binding to the extent permitted by applicable law and the CGA license conditions.

8. DATA HANDLING AND REPORTING

- The Company shall maintain a comprehensive and tamper-proof record of all account actions, including the trigger, rationale, communications, supporting documentation, investigative notes, and final outcome, for a minimum retention period of 5 years from the date of closure or resolution.
- Suspicious Activity Reports ("SARs") submitted to the FIU, or any other competent authority shall be retained securely and separately from standard case records, in accordance with applicable data protection and AML/CFT requirements.
- A periodic summary report of account suspensions, permanent closures, self-exclusion triggers, RG flags, and escalations shall be compiled by the RGO and submitted to the CGA in the required format, in accordance with applicable CGA license conditions and applicable law.

9. OVERSIGHT AND REVIEW

- This procedure shall be subject to formal review and revision on an annual basis, or earlier where necessitated by changes in applicable law, regulatory guidance, or internal policy developments.
- All relevant personnel, including the customer support team, compliance analysts, and risk investigators, shall undergo mandatory internal training on enforcement standards and the implementation of this procedure on an annual basis, in accordance with the Company's RG Policy.
- The Company shall conduct quarterly random audits of closed case files to ensure:
 - Procedural compliance,
 - Accurate documentation,
 - Fair and consistent application of criteria across cases.

10. CONTACT INFORMATION

The contact person for matters relating to this procedure is:

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

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