

Gameplay International B.V.
Company Number: 148409

RESPONSIBLE GAMING POLICY

Approved by the Board of Directors

10/03/2025

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1. Key Terminology and Definitions

Games of Chance

A game where individuals place monetary wages or stakes of equivalent value in pursuit of financial rewards. The final outcome is dictated either entirely by chance or by a blend of chance and skill, with no substantial influence from the player. Examples of such games include sports betting and poker.

LOK – National Ordinance on Games of Chance

The primary regulatory framework governing gambling activities in Curaçao, outlining legal standards and compliance requirements for licensed operators.

Marketing, Promotion, and Advertising

All communication efforts intended to promote an operator's brand, gaming platform, or services, spanning multiple formats such as print media, digital advertisements, social media campaigns, and content marketing strategies.

Mandatory Compliance Requirements

The essential components of a Responsible Gaming Policy that must be adopted by all licensed operators. These elements are designed to align with the specific characteristics of the operator's target market and player base, ensuring adherence to responsible gambling standards.

Licensed Operator

A business entity holding a valid B2C gaming license issued by the Curaçao Gaming Control Board (GCB) or authorized under an Orange Digital Seal "Certificate of Operations", permitting the provision of gaming services.

Self-Exclusion

A player-initiated measure allowing individuals to voluntarily restrict their access to online gaming activities, either partially or entirely, for a designated period or permanently. This exclusion applies across all domains, platforms, and brands operated by the same licensee.

Vulnerable Individuals

As per Clause 1.1(h) of the LOK, a vulnerable person includes any individual who meets one or more of the following criteria:

- Under 18 years of age.

- Exhibiting signs of problem gambling, including an inability to regulate their betting behavior, which could lead to financial distress or harm to themselves or others.
- Prohibited from gambling due to legal restrictions or voluntary self-exclusion.
- Declared bankrupt, signifying a financially unstable condition incompatible with responsible gaming.

2. Overview of Responsible Gaming Policy

At Gameplay International B.V. we are dedicated to upholding a safe, transparent, and responsible gaming environment. As a licensed entity under the Curaçao Gaming Control Board (GCB), operating under license number OGL/2024/511/0630, our company enforces a comprehensive Responsible Gaming framework aimed at mitigating the risks associated with problem gambling and ensuring that gaming remains a form of entertainment rather than a source of harm.

Commitment to Responsible Gaming

To maintain industry-leading responsible gambling standards, Gameplay International B.V. ensures that:

- Responsible Gaming principles are integrated across all aspects of our operations, from player interaction to business strategy.
- A structured Responsible Gaming Policy is developed and maintained, fully aligned with GCB regulatory requirements.
- This policy is uploaded and updated regularly in the GCB Licensee Portal for ongoing compliance review.
- Periodic assessments and updates are conducted based on market trends, player behavior analytics, and regulatory changes.

Objective of the Responsible Gaming Policy

The primary goal of this policy is to provide effective tools, support mechanisms, and intervention strategies that empower players to maintain control over their gaming activities. Through education, self-regulation tools, and proactive intervention, Gameplay International B.V. ensures a gaming environment that prioritizes player well-being while fully complying with Curaçao Gaming Authority regulations.

3. Compliance and Player Protection Measures

As a licensed operator under the Curaçao Gaming Control Board (GCB), Gameplay International B.V. is committed to maintaining strict compliance with all regulatory requirements related to Responsible Gaming. To meet and exceed these obligations, the company enforces a structured Responsible Gaming framework that ensures both player protection and operational integrity.

Core Responsible Gaming Measures

Gameplay International B.V. implements key safeguards designed to promote responsible gaming and minimize the risks associated with problem gambling:

- Age Verification – Players must meet the minimum legal age requirement (18+), confirmed through strict identity verification processes.
- Transparency & Accessibility – All responsible gaming information is clearly displayed across our platforms, ensuring players can easily access guidance and tools.
- Self-Assessment Tools – Players have access to self-evaluation questionnaires that help identify signs of excessive gambling behavior.
- Player Behavior Tracking – The platform monitors betting patterns, deposit frequency, and gaming habits to detect early warning signs of problematic gambling.
- Cooling-Off & Self-Exclusion – Players can opt for temporary breaks (cooling-off periods) or permanent account restrictions (self-exclusion) to regain control over their gambling activities.
- Deposit Limits – Individuals can set daily, weekly, or monthly financial limits to regulate their spending and promote responsible wagering.
- Employee & Partner Training – Staff members, affiliates, marketing partners, and social media influencers receive specialized training on responsible gaming policies and ethical player engagement.
- Marketing & Advertising Compliance – All promotional activities strictly adhere to GCB regulations, ensuring they do not target vulnerable individuals, minors, or self-excluded players.

Commitment to Exceeding Industry Standards

While fulfilling all mandatory GCB requirements, Gameplay International B.V. goes beyond the minimum standards by incorporating advanced responsible gaming measures, ensuring continuous improvements in player protection and harm prevention.

Responsible Gaming Oversight & Policy Management

To ensure the successful implementation and enforcement of our Responsible Gaming framework, the company will designate a Responsible Gaming Officer (RGO). Until a dedicated RGO is assigned, the Compliance Officer (excluding AML/CFT duties) will assume responsibility for monitoring, evaluating, and reporting on Responsible Gaming initiatives.

The Compliance Officer is responsible for:

- Conducting an annual review of the Responsible Gaming Policy and assessing its effectiveness.
- Providing a detailed performance report to the Executive Management Team, outlining key insights and improvement recommendations.
- Reporting any updates, amendments, or compliance modifications to the GCB in a timely manner.

Player Protection Measures

Gameplay International B.V. is fully committed to fostering a safe and responsible gaming environment by implementing the following player-centric protections:

- Comprehensive Responsible Gaming Programs – A well-documented Responsible Gaming Policy outlines the company's approach to safe and ethical gaming practices.
- Player Support & Education – Players receive access to educational materials, self-help resources, and responsible gaming tools to assist in maintaining healthy gambling habits.
- Proactive Behavior Monitoring & Risk Detection – Advanced behavior-tracking mechanisms identify potential gambling-related issues, allowing proactive intervention strategies.
- Regulatory Compliance & Auditing – The company undergoes regular GCB compliance audits, maintains detailed reporting records, and updates operational protocols to meet industry best practices.

By integrating these protective measures, Gameplay International B.V. ensures a transparent, compliant, and player-first approach to responsible gaming, prioritizing player well-being, regulatory integrity, and ethical operational standards.

4. Player Information & Accessibility

At Gameplay International B.V., providing transparent and easily accessible Responsible Gaming information is a core principle of our commitment to safe and ethical gambling practices. Players must have unrestricted access to relevant information at all times, empowering them to make informed decisions and take proactive control over their gaming activities.

Integration of Responsible Gaming Information

To ensure seamless accessibility, responsible gaming content is strategically integrated throughout the website and application interface. This includes:

- Homepage Visibility – The Responsible Gaming Policy is prominently displayed on the homepage, ensuring players can access it with ease from key sections of the platform.
- Multilingual Availability – The policy is provided in English and additional languages relevant to our target markets, ensuring clarity and understanding for all players.
- Direct Access to Player Protection Tools – Players can easily navigate to responsible gaming tools, including:
 - Self-Exclusion options for temporary or permanent gambling restrictions.
 - Cooling-off periods to allow players to take short breaks from gambling.
 - Deposit limits to assist in managing and controlling financial exposure.
- Dedicated Support Contact – A responsible gaming assistance section is available on the homepage, providing direct contact options via email and live chat.

Responsible Gaming Policy and Terms & Conditions

To further reinforce player awareness, the Responsible Gaming Policy is explicitly referenced within the Terms & Conditions of Gameplay International B.V. This ensures:

- Players are fully informed about the available responsible gaming features and tools.
- The Terms & Conditions remain easily accessible and no more than one click away from the homepage.
- Players have the ability to review key responsible gaming guidelines at any time.

Footer Information & Regulatory Compliance

As part of our ongoing commitment to responsible gaming, critical responsible gambling messages and licensing details are displayed in the website's footer, including:

- A clear statement prohibiting underage gambling (18+ only).
- The official name and registered address of Gameplay International B.V.
- The license number issued by the Curaçao Gaming Control Board (GCB).
- A statement confirming regulatory oversight under GCB jurisdiction.
- A direct link to the Responsible Gaming Policy Statement for quick reference.
- The GCB's official digital seal, validating our compliance with licensing requirements.

Support for Players Experiencing Gambling Harm

Recognizing the importance of external support services, Gameplay International B.V. provides direct links to established gambling addiction organizations to assist players who may need additional help.

By ensuring responsible gaming tools, policies, and support mechanisms are readily available, Gameplay International B.V. upholds its commitment to a safe and responsible gaming environment, in full compliance with Curaçao Gaming Authority regulations.

5. Age Verification and Parental Control Tools

At Gameplay International B.V., we maintain strict age verification protocols to prevent underage gambling and ensure compliance with Curaçao Gaming Control Board (GCB) regulations. Before being granted access to register, deposit funds, or place wagers, all players must confirm they are at least 18 years old. Any account found to belong to a minor is immediately restricted and closed, with strict enforcement of regulatory policies.

Age Verification Process

To verify a player's age, Gameplay International B.V. requires the following:

1. Date of Birth Confirmation – During the registration process, players must provide their full date of birth and formally declare that they are 18 years or older.
2. Government-Issued ID Verification – A valid passport, national identity card, or driver's license must be submitted as proof of age in case KYC or AML milestones are reached by the player; however, if Gameplay International B.V. has any doubt of a player's age before the mentioned milestones are reached, ID Verification is to be requested earlier
3. Verification of Payment Method – Where applicable, the company may validate payment methods (e.g., credit card authentication) to further confirm a player's eligibility.

Handling Underage Accounts

If Gameplay International B.V. detects an underage player or has reasonable suspicion of false age declarations, immediate action is taken:

- The account is suspended pending further verification.
- If underage gambling is confirmed:
 - Access to the account is revoked permanently.
 - Deposited funds are refunded (except where restricted under AML policies).
 - All winnings are forfeited, in line with regulatory guidelines.
 - A formal notification is issued to the minor, outlining the reason for account closure.

Enhanced Age Verification & Security Measures

To reinforce compliance and prevent circumvention, Gameplay International B.V. may implement:

- Secondary verification methods, including:
 - Proof of address confirmation via utility bills or bank statements.
 - Selfie verification, requiring the player to submit a live photo holding their identification document.
 - Third-party database cross-checks to confirm identity and age.

- Proactive age verification before reaching KYC or AML milestones, if there is any doubt about a player's age.
- Detailed record-keeping of all age verification attempts and results, with logs readily available for regulatory audits upon request.

Parental Controls & Internet Filtering

Recognizing the importance of parental responsibility, Gameplay International B.V. encourages parents and guardians to take preventative steps to ensure that minors do not access gambling websites. Adults should secure:

- Devices used for online gambling.
- Account login details, including usernames and passwords.
- Saved payment methods, preventing unauthorized transactions by minors.

To assist in restricting underage access, we recommend using third-party parental control software, such as:

- Net Nanny (www.netnanny.com)
- GamBlock (www.gamblock.com)
- CyberSitter (www.cybersitter.com)

By enforcing strict age verification protocols and providing parental control resources, Gameplay International B.V. ensures a legally compliant and secure gaming environment, protecting minors from exposure to gambling activities.

6. Self-Assessment Tools for Players

At Gameplay International B.V., we encourage all players to actively monitor their gambling habits and make well-informed decisions about their gaming activity. As part of our commitment to responsible gambling, we provide self-assessment tools designed to help players evaluate whether their gambling behavior remains within healthy limits.

Review of Betting & Wagering Activity

To assist players in tracking their gambling patterns, we provide access to a detailed betting and wagering history, including:

- Transaction timestamps, allowing players to monitor their spending behavior.
- Comprehensive game and bet history, helping players analyze trends in their gambling activity.
- Deposit and withdrawal records, ensuring transparency in financial transactions.

By regularly reviewing these records, players can detect early signs of excessive gambling and take corrective action when needed.

Self-Assessment Tools for Responsible Gambling

To further support players in evaluating their gaming behavior, Gameplay International B.V. offers access to internationally recognized self-assessment tools, including quizzes and questionnaires designed to help identify whether a player may have a gambling addiction.

By offering comprehensive self-assessment tools and full access to gambling history, Gameplay International B.V. empowers players to make responsible gaming choices while maintaining full compliance with Curaçao Gaming Control Board (GCB) regulations.

7. Monitoring Player Behavior and Risk Detection

At Gameplay International B.V., we have implemented real-time monitoring systems designed to detect early indicators of problematic gambling behavior. Our approach combines advanced technology and human oversight to identify at-risk players and intervene promptly, ensuring full compliance with Curaçao Gaming Control Board (GCB) regulations.

Monitoring and Identifying High-Risk Gambling Patterns

Our behavior tracking system continuously analyzes player activity to detect gambling habits that may indicate risk. The following factors are monitored:

- Unusual deposit and wagering patterns, such as sudden spikes or erratic betting behavior.
- Use of multiple payment methods in an attempt to bypass deposit limits.
- Frequent withdrawal reversals, where players cancel pending withdrawals multiple times.
- Extended gaming sessions without breaks, signaling potential compulsive gambling.
- Repeated contact with customer support, particularly when requesting bonuses or displaying signs of distress.
- Frequent modifications to responsible gaming settings, such as continuously increasing deposit limits or repeatedly activating cooling-off periods.
- Significant spending by younger players (under 25 years old), particularly on high-risk games like casino or virtual betting.
- Maxing out credit cards and attempting to register additional payment methods.
- Spending habits that do not align with the player's known financial profile.
- Attempts to open multiple accounts to circumvent deposit or loss limits.

Player Risk Profiling & Assessment

Each player has a risk profile that is continuously updated based on betting behavior, transaction history, and gameplay patterns. If any irregularities or risk indicators emerge, our system triggers real-time alerts for further review by our Responsible Gaming Team.

Intervention Strategies for Problematic Gambling

When a player is identified as being at higher risk for gambling-related harm, Gameplay International B.V. takes immediate action. Our intervention strategies include:

- Direct Player Interaction – Our trained responsible gaming professionals contact the player, assess the situation, and offer guidance on responsible gambling tools.
- Customized Player Restrictions – If necessary, we apply deposit limits, time restrictions, or temporary account suspensions.
- Self-Exclusion Measures – In extreme cases, players may be permanently self-excluded from the platform.
- Ongoing Monitoring & Follow-Up – Players identified as at risk may receive additional follow-ups to ensure they remain in control of their gambling habits.

Staff Training & Readiness

To ensure effective intervention and player support, our Responsible Gaming and Customer Support teams undergo specialized training, including:

- Recognizing signs of gambling distress, such as agitation, frustration, or financial desperation.
- Conducting sensitive and structured conversations with at-risk players.
- Guiding players towards responsible gaming tools, including deposit limits and self-exclusion options.
- Documenting all interactions to ensure full regulatory compliance and internal tracking.

Escalation Protocol for High-Risk Cases

If a player's behavior indicates severe problem gambling, the case is immediately escalated to the Responsible Gaming Officer or Compliance Officer for review. Depending on the severity of the case, the following actions may be taken:

- Further account restrictions or exclusions.
- Referral to external gambling support organizations.
- Submission of regulatory reports in accordance with GCB guidelines.

By utilizing real-time behavior tracking, proactive intervention, and regulatory oversight, Gameplay International B.V. ensures that gambling-related risks are identified and addressed early. This structured approach reinforces our commitment to responsible gaming and player protection while ensuring full compliance with Curaçao Gaming Authority regulations.

8. Temporary Account Suspension (Cooling-Off Periods)

At Gameplay International B.V., we provide players with easily accessible, immediate cooling-off options, allowing them to pause gambling activities whenever necessary. This temporary self-imposed restriction helps players regain control over their gaming habits and promotes a healthy, responsible gambling environment.

If technical enhancements are required to improve this feature, Gameplay International B.V. will manually process cooling-off requests until a fully automated system is in place.

Availability & Activation

Players can initiate a cooling-off period for any of the following durations:

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

This option is clearly visible on our website and can be activated instantly with a single click, without requiring manual approval or email communication. Players can apply cooling-off periods to specific gaming categories or all gambling activities within the platform.

Immediate Restrictions Upon Activation

Once a player selects the cooling-off period, the following actions take place immediately:

- The player is informed of the difference between Cooling-Off and Self-Exclusion, with an option to proceed directly to Self-Exclusion for a longer restriction.
- The account is temporarily locked, restricting all gambling activities for the selected duration.
- Players are offered the option to opt out of marketing communications, ensuring they do not receive promotional material during their break.

No Interference or Player Deterrence

Gameplay International B.V. strictly prohibits any attempts to discourage players from initiating a cooling-off period. The following practices are not permitted:

- Questioning the player's decision or persuading them to reconsider.
- Requiring unnecessary approvals that could delay activation.
- Offering incentives, bonuses, or promotions to influence the player to continue gambling.

Account Reactivation & Additional Player Support

- Once the cooling-off period expires, the player's account is automatically reactivated, allowing them to resume gaming without any further steps.
- If a player feels they need additional restrictions, they are encouraged to use longer-term time-out options or self-exclusion programs for extended breaks from gambling.

By ensuring that cooling-off periods are instant, player-driven, and free from interference, Gameplay International B.V. upholds its commitment to responsible gambling and player well-being, maintaining full compliance with the GCB regulations.

9. Long-Term Player Restrictions (Self-Exclusion Program)

At Gameplay International B.V., we provide a comprehensive self-exclusion program to assist players in regaining control over their gambling habits and reducing the risk of gambling-related harm. This option is readily accessible, takes effect immediately upon request, and applies to all platforms and brands operated by Gameplay International B.V.

How to Initiate Self-Exclusion

Players can activate self-exclusion directly from the website through an easily accessible option, where they will find:

- A step-by-step guide on how to initiate self-exclusion.
- Available self-exclusion durations and their implications.
- Information on the benefits of self-exclusion, emphasizing its role in promoting responsible gambling and harm prevention.

The self-exclusion process is fully automated, requiring no manual approval or email correspondence, ensuring that requests are processed within 15 minutes or less.

Immediate & Irreversible Restrictions

Once a player submits a self-exclusion request, the following restrictions are applied instantly:

- All access to gambling activities is revoked, and the player's account is locked.
- Deposits, wagers, and withdrawals are immediately disabled.
- All associated payment methods are blocked to prevent circumvention of restrictions.
- The player's details are added to the Self-Exclusion Register, which is maintained for a minimum of seven years beyond the exclusion period.
- Players are strongly encouraged to extend their self-exclusion to other gambling platforms for additional protection.

- Duplicate account detection mechanisms are in place to ensure that players cannot bypass restrictions by creating new accounts.

Self-Exclusion Durations

As per Clause 5.4(2) of the LOK, players may choose from the following self-exclusion periods:

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

Once a self-exclusion request is activated, it cannot be reversed before the exclusion period ends.

Prohibited Actions During Self-Exclusion

Gameplay International B.V. strictly prohibits any attempts to influence or dissuade a player from initiating self-exclusion. This includes:

- Questioning the player's decision or encouraging them to reconsider.
- Delaying activation through unnecessary processes.
- Offering bonuses, incentives, or promotions to encourage continued play.

Players can choose to exclude themselves from specific gaming categories or from the entire platform, depending on their needs.

Financial & Account Management During Self-Exclusion

For players opting for full self-exclusion, the following account actions are enforced:

- All gambling-related transactions are blocked immediately.
- The player's account is fully deactivated, preventing any gaming activity.
- Any remaining funds (except where frozen due to AML policies) are refunded to the original payment method within two business days.
- All marketing and promotional materials are permanently disabled to ensure players are not tempted to resume gambling.

For partial self-exclusion (limiting access to specific game types rather than full platform exclusion), gameplay and wagering are blocked in line with the player's selected preferences.

Post-Exclusion Reactivation Process

Once the self-exclusion period ends, the player must:

1. Submit a written confirmation requesting account reactivation.
2. Receive a responsible gaming notification, reminding them of available safeguards and tools.

3. Be encouraged to complete a self-assessment, such as the Gamblers Anonymous 20-Question Quiz, to evaluate their readiness to return to gambling responsibly.

The player's account history remains intact, and reactivation is only permitted under their original account credentials, ensuring no duplicate accounts are created.

Marketing & Communication Restrictions

During and after the self-exclusion period:

- Gameplay International B.V. will not send any promotional materials or gambling incentives.
- Players will not be contacted regarding gambling activities, unless legally required (e.g., account security notices).
- Unlike cooling-off periods, self-exclusion requires the player to actively initiate their return once the exclusion term expires.

Compliance & Regulatory Reporting

All self-exclusion requests and interventions are documented in real time. If a self-excluded player or underage individual is found gambling, the following actions are taken:

- Immediate account suspension.
- Refund of any deposited funds within two business days, except where restricted under AML policies.
- A formal report is submitted to the GCB within five working days, detailing how the incident occurred and what corrective measures have been implemented.

Operator-Initiated Exclusion

In cases where problematic gambling behavior is evident, Gameplay International B.V. reserves the right to proactively exclude a player as a high-risk intervention measure. This may occur if:

- Financial distress is evident, indicating gambling-related harm.
- The player demonstrates signs of compulsive gambling.
- Fraudulent or criminal activities are detected on the platform.

All operator-initiated exclusions are formally documented, with records maintained for a minimum of five years. The GCB may request these records at any time for compliance verification.

By implementing a structured, transparent, and player-driven self-exclusion process, Gameplay International B.V. ensures strong player protection, full regulatory compliance, and a safer gambling environment for all users.

10. Limits & Player-Controlled Restrictions

At Gameplay International B.V., we empower players to manage their gambling activity responsibly by offering customizable financial limits. These tools allow individuals to control their spending habits, set boundaries that align with their gaming preferences, and reduce the risk of excessive gambling.

Deposit Limits & Player Control

To help players regulate their gambling expenditures, we offer deposit limit options that can be set for:

- Daily limits – Restricting the total deposits allowed within a single day.
- Weekly limits – Capping the amount that can be deposited over a seven-day period.
- Monthly limits – Setting a maximum deposit amount for a full calendar month.

Once a player reaches their self-imposed deposit limit, they will be unable to deposit additional funds until the specified period resets.

Flexibility & Enforcement of Limits

- Stricter limits can be applied at any time and take effect immediately to enhance player protection.
- Requests to increase deposit limits are subject to a mandatory seven-day waiting period, ensuring players have time to consider their decision carefully before raising their financial thresholds.

Exceptions for Active Gameplay & Wagers

In certain cases, a deposit limit or self-exclusion request may temporarily allow ongoing wagers to complete before full enforcement takes place. These exceptions include:

- Players participating in an active poker tournament when a time limit is reached.
- Unresolved ante-post bets on future events, where the wager remains valid until the event concludes.

In these scenarios, while new deposits, bets, or gaming activities will be restricted immediately, active wagers or games will be allowed to finish before the limit takes full effect.

Commitment to Responsible Gambling

By integrating customizable deposit limits, additional safeguards, and responsible gaming restrictions, Gameplay International B.V. ensures that players have the necessary tools to manage their gaming responsibly, while maintaining full compliance with the Curaçao GCB regulations.

11. Session Monitoring and Reality Check

At Gameplay International B.V., we promote responsible gambling and player awareness through Reality Check feature – Real-Time Session Timers, which help players monitor their gaming duration and spending habits. These tools ensure that individuals remain fully informed of their gameplay time and financial activity, enabling them to make conscious, responsible gambling decisions.

A persistent session timer remains visible at all times while a player is logged into their account. This allows players to track the duration of their gaming activity in real time, helping them recognize how long they have been actively playing.

Commitment to Responsible Gaming

By incorporating Reality Check features, Gameplay International B.V. ensures that players stay informed and in control of their gambling behavior, reinforcing responsible gaming principles in full compliance with Curaçao Gaming Control Board regulations.

12. Marketing & Advertising

At Gameplay International B.V., we are committed to ensuring that all marketing, promotional, and advertising activities align with responsible gaming principles and do not encourage excessive gambling. Our advertising approach is based on transparency, fairness, and player protection, ensuring that no misleading content, unethical marketing strategies, or irresponsible promotions are used.

All marketing efforts must never target minors, self-excluded players, or financially vulnerable individuals. Furthermore, all business partners, including affiliates, influencers, and VIP representatives—must strictly adhere to responsible gaming standards.

Responsible Advertising Guidelines

To maintain full compliance with the Curaçao GCB regulations, Gameplay International B.V. enforces strict advertising and promotional restrictions, including:

- No aggressive or misleading tactics – All advertisements are truthful, non-coercive, and transparent.
- No targeting of vulnerable groups – Marketing materials are never directed at minors, self-excluded players, or individuals showing signs of problem gambling.

- No portrayal of gambling as an investment – Gambling is not advertised as a way to generate income, escape financial hardship, or secure financial success.
- No misrepresentation of skill vs. chance – Marketing strategies do not imply that games of chance can be influenced by player skill, except where applicable to skill-based games.
- No emotional manipulation – Gambling is not marketed as a way to cope with stress, depression, or personal struggles in any of Gameplay International B.V.’s marketing materials.
- No child-friendly content – Cartoons, animations, or imagery appealing to minors are strictly prohibited in Gameplay International B.V.’s marketing materials.
- No use of celebrities or influencers with significant underage audiences – Social media personalities, entertainers, or public figures targeting minors are not used for gambling promotions in Gameplay International B.V.’s marketing materials.
- No sexual or explicit content – Gameplay International B.V. avoids suggestive, provocative, or inappropriate imagery in the marketing materials.
- No association with harmful behaviors – Gameplay International B.V.’s gambling promotions are never linked to smoking, drug use, excessive alcohol consumption, or other high-risk behaviors.

Bonus Promotions & Transparency

To ensure responsible gaming practices, Gameplay International B.V. enforces strict transparency in bonus promotions:

- Bonus terms and conditions are clearly stated and easy to understand.
- Promotions do not encourage excessive gambling or suggest that losses can be recovered through continued play.
- Marketing campaigns do not mislead players about bonus wagering requirements, restrictions, or eligibility.

Commitment to Responsible Gaming in Advertising

To reinforce responsible gambling awareness, all marketing materials must include clear responsible gaming messaging.

- All advertisements display responsible gambling disclaimers and helpline resources.
- Offline advertising complies with responsible gambling regulations set by GCB and media platforms.
- Social media gambling advertisements must be age-gated and explicitly identified as gambling-related content.
- Direct marketing campaigns (emails, SMS, push notifications) must exclude self-excluded players and those who have set gaming limits.

Affiliate & Influencer Marketing Compliance

Gameplay International B.V. requires all affiliates, influencers, and marketing partners to follow strict responsible gaming policies. To ensure compliance:

- Affiliates must sign legally binding agreements enforcing responsible marketing standards.
- Regular compliance audits are conducted to prevent misleading or unethical advertising.
- Penalties and contract terminations are enforced for any violations of responsible gaming policies.

For social media influencers, we require:

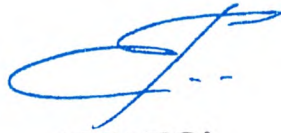
- Strict age verification to ensure they target an adult audience.
- No association with minors or vulnerable individuals.
- Avoidance of sexually provocative or misleading gambling endorsements.

Sponsorship & Responsible Branding

All sponsorships and branding agreements are subject to strict responsible gaming controls:

- Marketing materials must not appeal to minors or appear on youth sports equipment.
- Gambling-related branding is prohibited at events targeting underage individuals.
- All sponsorship content must incorporate responsible gambling messages.

By prioritizing responsible advertising, maintaining transparency, and enforcing compliance, Gameplay International B.V. ensures that all marketing activities adhere to ethical gaming standards while protecting players from misleading or excessive gambling influences.



(SMES)

**Solutions for Management
and Employment Support N.V.**

21-03-2025