

SEVENTIP N.V

Responsible Gaming Policy



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Responsible Gaming Policy

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VERSION CONTROL

Next Review Date

The policy will be reviewed on the following basis:

No less than once annually, with such review to be initiated by the policy owner approximately one month prior to the date following 12 months from which the policy was last approved.

- I. No less than once annually, with such review to be initiated by the policy owner approximately one month prior to the date following 12 months from which the policy was last approved.
- II. in response to any changes in relevant regulation and/ or legislation.
- III. in response to general guidance notes or best practice guidance issued by any relevant regulator.
- IV. in response to any regulatory action taken against any operator by any relevant regulator.
- V. in response to findings of a relevant internal or external audit; or
- VI. upon request of the management of the company.

NAME

ROLE

Christina Bali

Head of Operations

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Introduction

WPTGlobal's aim is to create an environment where all its clients can enjoy gambling and have fun while also remaining in control. The majority of the clients who use the products and services do so in a controlled and safe manner. On the other hand, we also acknowledge that gambling can be addictive to some and have negative consequences.

With that in our mind we have created our Procedures based on the Responsible Gaming Policy to be able to identify customers that are vulnerable or at risk and help and encourage them to seek help.

Limits

In order for the relevant departments and teams to ensure Responsible Gaming the company has put considerable effort into developing tools that allow customers to regulate their gambling by requesting limits, checks as well as timeouts and self-exclusions to either manage or terminate their use of WPTGlobal's APP and website.

Customers must confirm that they are of legal age upon registration stage and accept the following statement: 'I accept WPTGlobal's Terms and Conditions. I have read and understood WPTGlobal's Privacy Policy & Cookie Policy as published on the site and confirm I am 18 years of age or over'.

Once the customers have registered a player account, they are given the option to ask for certain limits to be implemented.

Once a limit is set it is effective immediately and once a limit is reached, the players are notified immediately and are not allowed to gamble beyond their limit.

Here is an overview of the various tools that are available to the players:

- Self-exclusion, permanent or for a specific period of time (6 months, 1 year, 2.5 years and 5 years)
- Cool off for a specific period of time - (24hrs, 72hrs, 1 week, 1 month, 3 months)

Customers who asked to set a permanent or temporary self-exclusion will not have their accounts automatically re-opened on the expiry of the exclusion period. Such customers can only have their accounts re-opened after contacting us themselves and after the RG team reviews the customer case. Moreover, all marketing communication is switched off for all self-excluded player accounts.

Reports and Triggers

Reports

Our reporting system focuses on various indicators of harm such as High-Risk Deposit Amounts, Increase in Deposits, Increase of Stakes and/or Losses, Overnight and/or Long-Lasting Game play sessions.

- Reports on deposits within 24 hours
- Reports on failed deposits due to insufficient funds
- Reports on percentage of days active within a month
- Reports on player gaming activity (stakes)
- Reports on losses
- Reports on the number of different payments methods used by the player

Triggers and flags

- Total deposits are 15 times greater than the ones of the previous month
- Deposited amount equals or exceeds 10k within 24 hours
- Number of cancelled withdrawals exceeds the number of 4 in 24 hours
- Number of failed deposits due to insufficient funds exceeds 5 within 24 hours
- Percentage of losses is 100% higher than the previous quarter
- Spikes in customer contacts
- Number of used payment methods is equal or greater than 3 within a calendar year

Customers that hit any of the above triggers, will be flagged to the Responsible Gambling Team for further review.

Protecting Minors

WPTGlobal, will be providing following information in the footer section:

- the company's details within the footers;
- a sign which indicates that underage gaming is not permissible. Clicking on the logo the customer is directed to a page where information with the below content can be found:

'Over 18s only

It is an offense for anyone under the age of 18 to open an account or to gamble with WPTGlobal. We carry out age-verification checks on all customers who use payment mechanisms which are available to under 18s and additionally perform random age-verification checks on customers using other forms of funding mechanisms. We may ask for information to verify your age and could restrict or suspend your account until your age is confirmed.

PLEASE NOTE THAT ANYONE UNDER THE AGE OF 18 YEARS OLD FOUND TO BE USING THIS SITE WILL HAVE ANY WINNINGS FORFEITED AND MAY ALSO BE REPORTED TO THE POLICE'.

Players with minors in the house that use the Internet are advised to set up parental controls in their operating system or install specialist software. There are a number of third-party applications available that parents or guardians can use to monitor or restrict the use of their computer's access to the Internet. These include:

- Net Nanny filtering software protects children from inappropriate web content:
www.netnanny.com
- CYBERSitter filtering software allowing parents to add their own sites to block:
www.cybersitter.com

Furthermore, there are responsible gambling messages displayed on the website such as "Gambling can be addictive. Please play responsibly" that are linked with our dedicated RG page that informs the customer about the possible risks and the strategies that could be employed to make gambling an enjoyable experience. Other useful info/tools to practise RG, for example info on how to gamble responsibly, a self-assessment, information for concerned third parties with the behaviour of their loved ones, indicators of when gambling can be considered an issue and what to do in those circumstances, information on support organisations and tools to blocking gambling sites.

How to Protect the vulnerable customers

One of our biggest priorities is to provide our Services for fun and entertainment. In cases where our Responsible Gambling team notices that this is no longer the case for a customer, action is being taken to protect the vulnerable person and its family and close environment.

The customer is contacted from our side via our established communication channels and is asked how he or she feels: if gambling has affected his/her life in any way; if personal commitments are neglected and deadlines missed; if the customer is having financial difficulties or struggling with payments and expenses in general, etc. (RG to be checked template to be linked here)

Once the customer has shared more information on the above, the Responsible Gambling Team will review the account and take all necessary actions, which can vary from proposing or imposing the setting of limits, providing a cool off so that customers can distance themselves from gambling, permanent closure of the account in case the customer indeed faces a problem and of course assisting and proposing professional help through official phone lines and websites.

Affordability Checks

At WPTGlobal, our aim is to ensure that all our customers are comfortable with their spendings and in line with their income. Therefore, our Responsible Gambling Team is performing regular affordability checks on the flagged player accounts. The customers might be asked to send over documentation on their monthly and/or yearly income such as Payslips or Bank statements or any other official document showing their financial status.

In the event where a customer refuses to hand in the required documentation the company reserves the right to suspend the player account temporarily or permanently.

Complaints and Communication

As part of the operational process, we will keep for at least 2 calendar years from the date of the last interaction a record of:

- all player interactions/complaints;
- date of each interaction; and
- whether an interaction has been ruled out and the reasons for this.

Our RG team will respond to player complaints within 3 days from when these were logged. The players can find all communication details on our website and reach us via email.

Training and Identification of Potential Gambling Problem

WPTGlobal is taking Responsible Gaming very seriously and therefore has invested in external and internal Training of its employees by experts who are very well trained and have a vast knowledge in Responsible Gambling or Gambling Addiction.

Our aim is to ensure that our Customer Support and Responsible Gambling team can identify any potential harm, monitor and interact with customers that might show some signs of problematic gambling behaviour demonstrating signs of agitation, distress, intimidation, aggression, and/or any other behaviour.

Following (but not limited to) statements can act as indicators that the customer might be at risk:

- I have lost too much money;
- I have financial difficulties, debts;
- It is very difficult to keep up with the expenses now;
- What I am doing is not healthy anymore;
- I am suffering/ I have problems;
- My family is being affected;
- Please refund me anything, I really need this money;
- Please process my withdrawal now I need the money urgently;
- Customer is begging for a bonus constantly;
- Customer contacts via chat/email are increasing rapidly;
- Constant change in limits set.

Our CS agents are trained to pick up on these cues and when they suspect that a customer is experiencing difficulty as a result of their gambling, they will point them to the support organizations that could assist them. They would also notify the Responsible Gambling Team about their concerns, who would then need to perform a thorough check on the player account and advise on the next steps. Those can vary from temporary or permanent account closure, refund of any remaining balance, block of financial and game play activity, block of all payment methods used by the customer and others.

Support Organisations and Helplines



The Responsible Gaming Foundation was founded in 2014 in Malta, and a national helpline was set up to provide support and guidance to individuals, family members, or significant others who are experiencing any problems related to gambling. www.rgf.org.mt



BeGamble Aware: aims to provide the facts about gambling in an accessible manner and supports initiatives that help prevent gambling from becoming a problem and minimise gambling-related harm. It is administered by The GREaT Foundation, a charity which raises funds from the gambling industry to support research, education and treatment of Problem Gambling. www.begambleaware.org / Freephone 24-7 National Gambling Helpline :0808 8020 133.



Gambling Therapy: In addition to these English language services, help is available in several other languages at Gambling Therapy. www.gamblingtherapy.org.