

Responsible Gaming Policy

Pelican Entertainment B.V.

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Definitions

Responsible Gaming: This term refers to principles and practices aimed at preventing and addressing reckless behaviour around Gaming, to protect vulnerable groups.

Vulnerable Groups: The term vulnerable groups refers to sectors of society such as minors (<18 years), people on low-income, people with gambling addictions, and those suffering from mental illness or psychological disorders.

Responsible Gaming Officer: An individual appointed as set forth in this policy, to lead the Responsible Gaming Programme.

Player: an individual, of legal age, who places bets or pays for the right to participate in a game of luck or chance to an entity acting in the capacity of an authorised Operator, which, in exchange, offers the player a prize in money or in kind, which he or she will win if they correctly guess the result thereof, this result not being foreseeable with certainty because it is determined by luck, chance or coincidence.

Self-Exclusion: A voluntary process in which individuals can opt out of the gaming site or specific areas of the same. This is a self-help and self-control technique that allows you to take a break and assess the possible consequences of your pattern of behaviour when it comes to gambling.

Marketing, promotion, and advertising encompass all strategies, messages, and media employed to promote an operator's domains, brands, products, or services. This includes, but is not limited to, print media, digital marketing, content marketing, and social media campaigns. These activities are integral components of the marketing communications mix, which utilizes various channels and tools to deliver clear and consistent messages to target audiences.

Authorised operator: legal entity authorised by the corresponding authority to operate games of luck and chance.

Policy Overview

At Pelican Entertainment B.V. (the Company) we are fully committed to upholding the principles of Responsible Gaming as outlined by the Curaçao Gaming Authority (CGA). As a licensed operator with License number OGL/2024/561/0554 issued November 15th, 2024, Pelican Entertainment B.V. (Company registration number 134359) we recognize our responsibility to foster a safe, transparent, and fair gaming environment where players can enjoy gambling as a form of entertainment while minimizing potential risks.

In compliance with the Curaçao Gaming Authority (CGA) regulatory framework, we have developed and implemented a Responsible Gaming Policy that aligns with industry best practices and the specific needs of our target markets. Our policy includes measures to prevent problem gambling, protect vulnerable players, and ensure responsible gaming behaviour across our platform.

By integrating Responsible Gaming principles into our operations, we aim to:

- Promote safe and controlled gaming.
- Experiences for all players.
- Prevent underage gambling and ensure compliance with age restrictions.
- Provide tools and resources to help players manage their gambling behaviour.
- Support initiatives that address problem gambling and player well-being.

We value our players and hope that you enjoy our products responsibly, and that gambling continues to be fun and entertaining. It is our mission to provide our players with the most entertaining gambling experience and it is our duty to help prevent compulsive use of and underage access to our gaming products. As a responsible, licensed gaming company, we have implemented a number of company policies and tools to promote responsible gambling.

Our objective is to ensure that our players enjoy our services in a safe, secure and supportive manner.

Player Information and Accessibility

As a licensed casino operator, we are committed to ensuring that players have access to clear, transparent, and accessible information that allows them to make informed decisions about their gaming activities. In compliance with the regulatory requirements set by the Curaçao Gaming Authority (CGA), we provide comprehensive Responsible Gaming measures throughout our website and application interface.

Our Responsible Gaming Policy is prominently displayed on our homepage and is easily accessible from all relevant sections of our platform. This policy is available in English as well as the language(s) of our target markets, ensuring that all players can fully understand their rights and the available responsible gaming resources.

We offer direct access to player protection tools that enable players to manage their gaming behaviour effectively: These tools include:

- **self-exclusion options**

Self-exclusion is a decision taken by the player in strict exercise of his self-control and willpower. It is intended as a tool for making conscious and informed decisions regarding gaming and, therefore, it is the player's own responsibility to fulfil it, without prejudice to the actions that the Operator may take with respect to excluded players to ensure compliance with the self-exclusion decision.

- **cooling-off periods**

A cooling-off period in gambling is a temporary self-exclusion tool that allows players to take a break from gambling for a specific period of time. It is designed to help individuals regain control over their gambling habits and prevent impulsive behaviour.

During a cooling-off period, the player cannot deposit, place bets, or access gambling services on the platform. Unlike permanent self-exclusion, a cooling-off period is temporary and typically lasts from 24 hours to several months, depending on the platform's responsible gaming policies.

- **deposit and loss limits**

Players have the option to set a cap on the total amount they can deposit within a specified timeframe, such as daily, weekly, or monthly.

Once the set deposit limit is reached, the player will be restricted from making additional deposits until the limit resets for the next period.

Furthermore, we provide direct links to reputable gambling addiction support organizations, such as **GamCare** ([GamCare.org.uk](https://www.gamcare.org.uk)) which is a national resource for gambling-related problems, educational resources and training to ensure gaming remains a positive experience. **Gamblers Anonymous**, that provides support for

compulsive gamblers, including online forums and support groups (GamblersAnonymous.org.uk/) and **BeGambleAware** is an independent organization that provides free, confidential support and resources for individuals struggling with problem gambling (www.begambleaware.org)

Through these comprehensive measures, we strive to create a safe, transparent, and responsible gaming environment where gambling remains an enjoyable form of entertainment while minimizing potential risks associated with problem gambling.

Age Verification

To prevent underage gambling, we enforce a strict age verification process:

- Players must confirm they are 18 or older before depositing or playing.
- Age verification is conducted via Date of Birth confirmation, an "I am over 18" checkbox, and payment method verification (e.g., credit card ownership).
- Government-issued IDs (passport, national ID, or driver's license) must be provided as part of the Know Your Customer (KYC) process.
- If a player is found to be underage, their account will be closed, deposits will be refunded (except in cases of AML holds), and any winnings will be forfeited.
- Records of all verification attempts are maintained for regulatory review.

Parental Control and Internet Filtering

To prevent underage access, we encourage adults to safeguard usernames, passwords, and payment details. We also recommend third-party parental control software such as:

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

Self-Assessment Tools

Players can access their betting history and transaction records to assess their gambling behaviour. We provide self-assessment tools like the Gamblers Anonymous 20-question quiz (<https://gamblersanonymous.org/20-questions>) and the CAGE Gambling Questionnaire, which helps players identify problematic gambling patterns.

Players are encouraged to answer the following questions honestly:

1. **C – Cut Down:** Have you ever felt you should cut down on your gambling?
2. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
3. **G – Guilty:** Have you ever felt guilty about your gambling?
4. **E – Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.
- 2 or More Yes Answers: High risk.
- further evaluation and intervention are strongly recommended.

Behaviour Tracking, Intervention & Escalation

Frontline personnel, such as customer service representatives and VIP managers, are responsible for monitoring player behaviour to identify potential issues through patterns and direct interactions. When at-risk behaviour is detected, trained responsible gaming professionals reach out to the players, offering options like deposit limits, time-outs, and self-exclusion. In severe cases, mandatory account restrictions or self-exclusion may be enforced. The company also employs trained staff and technological tools, including gaming platform features, in-game tools, artificial intelligence (AI), and machine learning (ML), to enhance monitoring efforts.

Identification of High-Risk Gambling Behaviour

The Company utilizes automated monitoring systems and manual reviews to identify behavioral indicators that may suggest problematic or excessive gambling activity. The following non-exhaustive indicators may trigger a responsible gaming review:

- Significant increases in deposit frequency or wagering activity.
- Extended gambling sessions without meaningful breaks.
- Repeated failed deposit attempts or use of multiple payment methods.
- Frequent requests to reverse withdrawals.
- Indicators of financial distress or loss-chasing behaviour.
- Aggressive, distressed, or emotionally unstable communication with customer support staff.

- Multiple account creation attempts or attempts to circumvent responsible gaming restrictions.
- Repeated changes to deposit limits or responsible gaming settings.
- Gambling activity occurring during prolonged or unusual hours.
- Customer disclosures relating to gambling addiction, financial hardship, or mental distress.

The Company reserves the right to assess player activity using a risk-based approach and apply enhanced responsible gaming measures where necessary.

Internal Escalation Procedures

Where concerning gambling behaviour is identified, the matter is escalated internally in accordance with the severity and frequency of the observed activity.

Initial alerts generated through automated systems or staff observations are reviewed by the Responsible Gaming team or designated compliance personnel. Where appropriate, the matter is escalated to the Responsible Gaming Officer (RGO) and senior compliance management for further assessment.

Escalation measures may include:

- Enhanced account monitoring.
- Direct responsible gaming interactions with the player.
- Temporary account restrictions.
- Mandatory cooling-off recommendations.
- Deposit limit reductions.
- Suspension of marketing communications.
- Temporary or permanent account suspension.
- Operator-initiated self-exclusion where justified.

Where serious gambling-related harm is suspected, immediate protective measures may be implemented without prior notice to the player.

Customer Interaction Procedures

When intervention is deemed necessary, the Company may contact the player using appropriate communication channels, including email, live chat, or telephone communication where applicable.

Responsible gaming interactions may include:

- Providing information regarding responsible gambling tools and support services.
- Encouraging the player to consider deposit limits, cooling-off periods, or self-exclusion.
- Issuing safer gambling reminders based on observed behavior.
- Requesting additional source of funds or affordability information where appropriate.
- Offering links to independent gambling support organizations.

All communications with players are conducted in a professional, non-confrontational, and responsible manner, with the primary objective of minimizing gambling-related harm.

Key monitoring factors

- **Deposit and Wagering Frequency:** Noticing sudden increases or irregular patterns in deposits, wagers, or gaming sessions.
- **Multiple Payment Methods:** Observing the use of various payment options, especially if it seems aimed at bypassing limits.
- **Reversing Withdrawals:** Identifying players who frequently cancel withdrawal requests.
- **Extended Play Sessions:** Monitoring prolonged gaming periods without breaks.
- **Increased Communication with Customer Support:** Tracking frequent contacts, especially those involving bonus requests or signs of agitation.
- **Frequent Changes to Responsible Gaming Tools:** Watching for repeated adjustments to deposit or loss limits or frequent use of cooling-off periods.
- **Young Players Spending Substantial Amounts:** Paying attention to players under 25 years old who spend significantly, particularly on casino or virtual games.
- **Maxing Out Credit Cards:** Noting players who exhaust their credit limits and attempt to register additional cards.
- **Unrealistic Spending Patterns:** Detecting spending behaviours that don't align with the player's demographic profile.
- **Attempts to Open Multiple Accounts:** Identifying efforts to create multiple accounts to circumvent deposit or loss limits.

Procedures for Player Identification and Intervention

Pelican Entertainment B.V has a structured approach to addressing problem gambling behaviour:

Risk Assessment of Players Profile

- Establishing player profiles with relevant data to assess individual risk levels.
- Continuously monitoring behavioural risk factors with real-time alerts for concerning activities.

Direct Player Interaction:

- Initiating contact with players exhibiting concerning behaviour through trained responsible gaming professionals.
- Documenting interactions, indicators of concern, and actions taken within the Player Account Management system.

Interventions of Responsible Gaming:

- Informing at-risk players about tools like deposit limits, time-outs, and self-exclusion.
- Following clear guidelines for escalating concerns, which may involve applying deposit limits, temporarily suspending access pending further review, or excluding the player in cases of extreme risk.

To uphold a secure, fair, and transparent gaming environment, Pelican Entertainment B.V implements a rigorous player identification and verification process. This process serves to:

- Confirm player identities
- Prevent fraudulent activity
- Ensure compliance with responsible gaming and regulatory requirements

The level of verification varies based on the player's risk profile, with enhanced checks applied in higher-risk cases.

Identification Process

Upon registration, players must provide the following information to establish their identity:

- Full Name
- Permanent Residential Address

- Date and Place of Birth
- Nationality
- Government-Issued Identification Number

For low-risk players, this basic information may be sufficient. However, in cases where there is a heightened risk, additional details may be required to assess potential financial risks and meet regulatory obligations.

Risk Assessment

Each new player undergoes an initial risk assessment based on the information provided at registration. This rating determines the level of due diligence necessary.

- Risk ratings are dynamic: They are continuously updated based on gameplay behaviour, transaction patterns, and updated verification data.
- Higher-risk players may be subjected to more frequent or in-depth verification checks.

Verification Process

To confirm player identities and maintain compliance with industry standards, Pelican Entertainment B.V. requires:

- A government-issued photo ID (*passport, national ID card, or driver's licence*)
- Proof of residential address (*utility bill or bank statement not older than six months*)
- Verification of address, which may include official letters, email confirmation, or direct phone contact

Additional Security Measures

For enhanced verification and fraud prevention, Pelican Entertainment B.V. may implement the following security protocols:

- Biometric verification: Matching ID photos with real-time uploaded selfies
- Database cross-referencing: Checking identity details against official records
- IP address tracking: Detecting suspicious login locations to prevent identity fraud
- Validation of payment methods: Ensuring that all deposits originate from legitimate, regulated financial institutions

Enhanced Due Diligence

If initial verification is inconclusive, Pelican Entertainment B.V. may request additional documentation, including:

- A real-time selfie holding an ID
- Proof of first deposit (*from a verified financial institution*)

These extra layers of security help protect against:

- Identity theft and fraud
- Underage gambling
- Money laundering and financial crimes

Staff Training

The company ensures that customer service and responsible gaming staff are trained to:

- **Recognize signs of gambling distress**, identify indicators such as agitation, aggression, financial desperation, preoccupation with gambling, and significant increases in gambling frequency or stakes
- **Conduct sensitive and structured conversations with at-risk players**. Engage with at-risk players empathetically, utilizing effective communication techniques to discuss their gambling behaviours and offer support.
- **Direct players to appropriate support resources and responsible gaming tools**. Inform players about available resources, including self-exclusion programs, deposit limits, time-outs, and external support services like counselling and helplines.
- **Document all interactions for compliance and follow-up actions**. Maintain detailed records of all interactions with players concerning responsible gaming to ensure compliance with regulatory requirements and facilitate appropriate follow-up actions.

Responsible gaming training is conducted annually and upon onboarding for all relevant employees. The training program is regularly updated to incorporate the latest best practices and feedback from internal and external stakeholders. Effectiveness is evaluated through formal mechanisms, such as pre- and post-training assessments, to ensure staff are well-prepared to support responsible gaming initiatives.

Intervention Logging & Record Keeping

All responsible gaming alerts, assessments, customer interactions, interventions, and decisions are documented and securely retained within the Company's internal compliance systems.

Records maintained may include:

- Details of the identified behavioral indicators.
- Dates and outcomes of customer interactions.
- Actions taken by responsible gaming personnel.
- Restrictions or limitations applied to the account.
- Internal escalation notes and management approvals.
- Copies of player communications relating to responsible gaming interventions.

Responsible gaming records are retained for a minimum period required under applicable Curaçao regulatory requirements and may be made available to the Curaçao Gaming Authority upon request.

Cooling-Off Period

As an operator committed to responsible gaming, we ensure that the cooling-off period is easily accessible, immediate, and free from interference. If technical or platform modifications are required to implement this feature, we will provide this service manually until a technological solution is fully integrated. Cooling-off restrictions become effective immediately upon activation.

Availability and Accessibility

We offer players the option to activate a cooling-off period of 24 hours, 7 days, 1 month, or 3 months, on all product verticals available on our platform, during which they will be temporarily restricted from gambling activities. The cooling-off option will be clearly displayed on our website and accessible via a single-click button, without the need for email communication or operator approval.

Immediate Activation and Restrictions

Upon a player's selection of the cooling-off option, the following measures are implemented to promote responsible gambling:

- **Clarification of Options:** Players are informed about the distinctions between a cooling-off period and self-exclusion, allowing them to make an informed choice. They may opt for self-exclusion if it better suits their needs.
- **Instant Enforcement:** The chosen restriction is applied immediately, ensuring prompt adherence to the player's decision.
- **Account Suspension:** The player's account is temporarily locked, preventing any gambling activities during the specified cooling-off period.
- **Marketing Opt-Out:** Players are provided the option to remove themselves from marketing communications throughout the duration of the cooling-off period.

To uphold ethical standards, our policy strictly prohibits any actions that may discourage players from initiating a cooling-off period, including:

- **Questioning the Player's Decision:** Respecting the autonomy of the player's choice without inquiry.
- **Offering Reassurances to Delay the Process:** Avoiding any attempts to persuade the player to reconsider or postpone their decision.
- **Providing Incentives to Continue Playing:** Refraining from offering bonuses, promotions, or similar incentives to encourage continued play.

Reactivation and Additional Time-Out Options

At the conclusion of the cooling-off period, the following procedures are in place:

- **Automatic Account Reactivation:** The player's account is automatically reactivated, allowing the resumption of gaming activities without the need for further action.
- **Availability of Additional Time-Out Options:** Players are informed about the availability of further time-out options or self-exclusion programs should they feel the need for extended or more permanent restrictions.

These measures are designed to support responsible gambling practices and ensure that players have control over their gaming activities.

Self-Exclusion

We have established a comprehensive and well-documented self-exclusion program

designed to empower players to manage their gambling behaviour and mitigate potential harm. Key components of this program include:

1. **Immediate Implementation:** Upon a player's request for self-exclusion, the restriction is enforced without delay, effectively preventing access to gambling activities.
2. **Self-Exclusion Register Maintenance:** We maintain a dedicated Self-Exclusion Register, recording details of self-excluded players. These records are retained for a minimum of five years following the conclusion of the exclusion period, ensuring compliance with regulatory obligations and facilitating ongoing support.
3. **Payment Method Restrictions:** Any known payment methods associated with a self-excluded player are blocked during the exclusion period. This measure prevents the circumvention of self-exclusion restrictions and reinforces the effectiveness of the program.
4. **Comprehensive Support and Resources:** We provide self-excluded individuals with information about available support services, including counselling and support groups, to assist in managing their gambling behaviour.
5. **Regular Program Evaluation:** Our self-exclusion program undergoes regular assessments to ensure its effectiveness and alignment with evolving best practices in responsible gambling. Feedback from participants is utilized to enhance the program continually.

By implementing these measures, we aim to create a safer gambling environment and support individuals in maintaining control over their gambling activities.

Self-Exclusion Process and Requirements

Accessibility and Communication

To ensure that self-exclusion is easily accessible and transparent, we provide the following:

Prominent Visibility: The self-exclusion option is clearly displayed across our website, ensuring easy access for all players.

Comprehensive Information: Players will receive clear guidance on:

- The steps required to initiate and complete self-exclusion.
- The range of available self-exclusion durations.
- The benefits of self-exclusion as a responsible gaming tool to prevent problem gambling.

Multi-Channel Availability: Self-exclusion information and tools will be accessible via the website, mobile app, customer support, and responsible gaming help sections.

Immediate and Irreversible Action

Instant Activation: Players can self-exclude entirely online without requiring email confirmation, manual approval, or customer support intervention.

User-Friendly Process: The self-exclusion process is streamlined to be easy to understand and completed within 15 minutes.

Fraud Prevention Measures: Advanced verification tools are in place to detect duplicate accounts and prevent self-excluded players from registering new accounts using alternative credentials.

Comprehensive Blocking: A self-excluded player will also be restricted across all our domains and will be encouraged to self-exclude from other gambling operators via national self-exclusion schemes.

Self-Exclusion Periods and Restrictions

In strict compliance with regulatory standards, we offer long-term self-exclusion options, including:

- **1 Year, 3 Years, 5 Years, 10 Years, and Lifetime Self-Exclusion**
- **Instant Enforcement:** Once a self-exclusion request is submitted, it is applied immediately without delay.
- **Ethical Implementation:** We strictly prohibit any actions that discourage self-exclusion, including:
 - Questioning the player's decision.
 - Offering incentives, bonuses, or promotions.
 - Providing reassurances to reconsider the decision.
 - Delaying or obstructing the self-exclusion process.
- **Irreversible Commitment:** Once self-exclusion is confirmed, it cannot be revoked or shortened before the designated period ends.
- **Customizable Exclusion:** Players may self-exclude from one, multiple, or all product verticals (e.g., casino, sportsbook, poker).

Financial and Account Management

When a player opts for full self-exclusion across all verticals:

- **Transaction Blocking:** All gambling-related transactions are immediately halted.

- **Account Deactivation:** The player's account is suspended to prevent further engagement.
- **Fund Reconciliation:** Any remaining withdrawable funds, excluding those subject to AML (Anti-Money Laundering) restrictions, will be refunded to the original payment method within two business days.
- **Marketing Removal:** The player is permanently unsubscribed from all promotional and marketing communications.

For **self-exclusion from specific verticals:**

- **Targeted Restriction:** Gameplay and wagering access are restricted according to the player's chosen exclusions while allowing access to permitted products.

Reactivation and Post-Exclusion Protocol

At the conclusion of the self-exclusion period:

- **Written Reactivation Request:** Players must submit a formal request to restore their account.
- **Responsible Gaming Support:** Before reactivation, players will receive responsible gaming guidance, including reminders of available protective measures.
- **Gambling Awareness Questionnaire:** To encourage informed decision-making, players will be asked to complete a self-assessment questionnaire regarding their gambling habits.
- **Account Reactivation Under Original Credentials:** The player's gaming history is preserved, and their account is only restored under the original registered details to prevent circumvention of previous exclusions.

These policies ensure that self-exclusion remains an effective tool for players seeking control over their gambling behaviour while promoting a safer and more responsible gaming environment.

Marketing and Contact Restrictions

During and after a self-exclusion period, the following restrictions will apply:

- **Limited Communication:** Players will not receive any contact from us unless it pertains to legal matters or essential non-promotional information.
- **No Marketing or Incentives:** Self-excluded players will not be sent promotional content, free play offers, bonuses, or any form of gambling-related incentives.

- **Reactivation Procedures:** While cooling-off periods conclude automatically, reactivating an account after self-exclusion requires explicit player action to resume gameplay.

Compliance and Regulatory Obligations

To ensure full compliance with responsible gaming regulations, all self-exclusion activities will be documented in real time. In the event that a self-excluded player or an underage individual gains access to gambling services beyond their exclusion settings:

- **Refund of Deposits:** Any deposited funds (excluding those restricted by Anti-Money Laundering (AML) policies) will be refunded within two business days.
- **Immediate Account Suspension:** The account will be blocked to prevent further access.
- **Regulatory Reporting:** A formal incident report will be submitted to the relevant regulatory authority within five working days.

Initiated Exclusion

In certain circumstances, we may proactively exclude a player as part of our high-risk intervention measures, particularly if:

- **Evidence of Problematic Gambling Behaviour:** The player exhibits signs of compulsive or high-risk gambling behaviour.
- **Involvement in Criminal Activities:** The player engages in fraudulent or unlawful activities on our platform.

All cases of initiated exclusion will be formally documented, with records retained for a minimum of five years to ensure regulatory compliance and responsible gaming enforcement.

Limits

We offer a suite of tools designed to help players manage their gambling activities responsibly. These tools include the ability to set deposit limits on a daily, weekly, or monthly basis. Players can decrease their limits at any time with immediate effect, while requests to increase limits are subject to a waiting period to ensure informed decision-making.

Deposit and Other Limits

- **Deposit Limits:** Players can set maximum deposit amounts for specified periods (daily, weekly, or monthly). Once a limit is reached, no additional deposits are permitted until the next period begins.
- **Modification of Limits:**
 - **Decreasing Limits:** Requests to lower deposit limits take effect immediately, allowing players to promptly reduce their spending.
 - **Increasing Limits:** Requests to raise deposit limits are subject to a mandatory seven-day waiting period, promoting thoughtful decision-making and preventing impulsive increases.
- **Additional Limits:** Depending on market requirements, we may offer other customizable limits, such as loss limits, time limits, or wager limits, to further support responsible gambling practices.

By providing these customizable tools, we aim to empower players to maintain control over their gambling activities and promote a safe and enjoyable gaming environment.

Reality Check

To support responsible gambling practices, we have implemented comprehensive reality check measures designed to help players monitor and manage their gaming activities effectively:

1. **Visible Real-Time Session Timer:** A continuously displayed timer tracks the duration of each gaming session, allowing players to remain aware of the time spent on the platform.
2. **Player-Activated Reality Check Alerts:** Players can configure periodic notifications that pause gameplay at set intervals. These alerts provide information on session duration, amount wagered, and current winnings or losses, prompting players to reflect on their activity before choosing to continue or take a break.

By integrating these tools, we aim to promote safer gaming habits and empower players to maintain control over their gambling behaviour.

Marketing and Advertising

We adhere to responsible gaming principles in all marketing and advertising efforts. Direct marketing (emails, SMS, push notifications) is strictly prohibited during active cooling-off or self-exclusion periods.

Advertising and Marketing Restrictions

We ensure:

- No aggressive, misleading, or irresponsible advertising.
- No targeting of vulnerable groups, minors, or problem gamblers.
- No portrayal of gambling as an investment or financial solution.
- No emotional manipulation or misleading representations of skill vs. chance.

Affiliate and Social Media Advertising

- All affiliates must comply with responsible gaming standards.
- Social media influencers must be of legal age, have appropriate audiences, and refrain from sexually provocative content.
- Sponsorships must not target vulnerable individuals, minors, or youth-related events.

This policy reinforces our commitment to responsible gaming and ensures compliance with regulatory standards. This policy is subject to regular reviews and will be updated as necessary. All revisions are subject to approval by the Board of Directors.



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Director of PELICAN ENTERTAINMENT B.V.
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