

ASPRO N.V.

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Responsible Gaming Policy

Approved by the Board of Directors

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Definitions

- **Responsible Gaming:** A framework of policies and procedures aimed at minimizing gambling-related harm while promoting safe and controlled gaming behavior.
- **Vulnerable Groups:** Individuals at higher risk of developing gambling-related problems, including minors (<18 years), those with gambling addictions, low-income individuals, and those with mental health disorders.
- **Responsible Gaming Officer:** A designated authority responsible for implementing and overseeing responsible gaming practices.
- **Player:** An individual who participates in online gaming activities while adhering to legal age and regulatory guidelines.
- **Self-Exclusion:** A voluntary process that allows individuals to temporarily or permanently restrict access to gaming activities.
- **Marketing and Advertising:** Promotional strategies used to market gaming products, subject to strict ethical and responsible gaming standards.
- **Authorized Operator:** A licensed entity authorized by the regulatory authority to conduct gaming operations.

Policy Introduction

At **Aspro N.V.** (the Company), we are dedicated to upholding the principles of Responsible Gaming, as established by the Curaçao Gaming Authority (CGA). As a licensed operator (License No. OGL/2024/565/0553, issued on November 12th, 2024), **Aspro N.V.** (Company Registration No. 140802) recognizes its responsibility to maintain a safe, transparent, and fair gaming environment, allowing players to engage in gambling as a form of entertainment while minimizing associated risks.

In strict compliance with CGA regulations, we have developed and implemented a Responsible Gaming Policy aligned with industry best practices and tailored to the specific needs of our players. This policy incorporates a comprehensive framework designed to prevent problem gambling, protect vulnerable individuals, and promote responsible gaming behaviors throughout our platform.

Our Commitment to Responsible Gaming:

By embedding responsible gaming principles into our operational framework, we aim to:

- ✓ Foster a secure and controlled gaming environment that prioritizes player wellbeing.
- ✓ Prevent underage gambling by enforcing stringent age verification measures.
- ✓ Equip players with tools and resources to help them manage their gambling behavior effectively.

✓ Support problem gambling initiatives and promote access to professional assistance.

At **Aspro N.V.**, we value our players and encourage responsible gaming practices, ensuring that gambling remains a responsible and enjoyable form of entertainment. Our mission is to deliver a superior gaming experience while proactively preventing compulsive gambling and underage access to gaming services. As a responsible and fully licensed operator, we have implemented a range of policies, tools, and safeguards to promote responsible gaming.

Our Objective:

We strive to ensure that all players engage with our platform in a safe, secure, and supportive environment, fostering positive gaming habits and reducing the risk of gambling-related harm.

Player Information and Accessibility

As a licensed casino operator, we are committed to ensuring that players have access to clear, transparent, and easily accessible information to help them make informed decisions about their gaming activities. In compliance with the regulatory framework established by the Curaçao Gaming Authority (CGA), we integrate comprehensive Responsible Gaming measures throughout our platform, ensuring player safety and promoting responsible gambling practices.

Enhancing Player Awareness & Protection

- Our Responsible Gaming Policy is prominently displayed on our homepage and across key sections of our platform.
- The policy is available in multiple languages, ensuring that all players fully understand their rights and available responsible gaming resources.
- We provide direct access to player protection tools, empowering individuals to regulate their gambling activities effectively.

Responsible Gaming Tools

We offer a range of self-regulation tools designed to help players manage their gaming behavior responsibly, including:

1. Self-Exclusion

- Players can voluntarily restrict their gaming access for a specific or indefinite period.
- This decision is made at the player's discretion, allowing them to take control of their gambling habits.
- The Operator ensures compliance with self-exclusion requests to prevent further access.

2. Cooling-Off Periods

- A temporary self-exclusion tool designed to help players pause their gambling activities and regain control over their habits.
- During this period, players cannot deposit, place bets, or access gaming services.
- Cooling-off durations typically range from 24 hours to several months, depending on the platform's policies.

3. Deposit limits

- Players can set limits on the amount they deposit over a specific timeframe (daily, weekly, or monthly).
- Once the set deposit limit is reached, no further deposits can be made until the next period begins.

Support & Assistance for Responsible Gaming

To ensure that players have access to professional support, we provide direct links to reputable gambling addiction support organizations. Our Commitment to a Safe & Responsible Gaming Environment.

By integrating robust responsible gaming measures, we strive to create a safe, transparent, and ethical gaming experience where players can enjoy gambling responsibly while minimizing potential risks.

Age Verification

To ensure compliance with responsible gaming regulations and prevent underage gambling, we implement a strict age verification process:

- **Mandatory Age Confirmation:** Players must verify that they are 18 years or older before making deposits or participating in gaming activities.
- **Verification Methods:** Age verification is conducted through multiple checks, including Date of Birth confirmation, an "I am over 18" declaration checkbox, and payment method verification (e.g., confirming credit card ownership).
- **Know Your Customer (KYC) Process:** Players are required to submit a government-issued identification document (passport, national ID, or driver's license) as part of our KYC procedures.
- **Enforcement Measures:** If a player is found to be underage:
 - Their accounts will be immediately closed.
 - Any deposits will be refunded, except in cases involving Anti-Money Laundering (AML) holds.
 - All winnings will be forfeited.
- **Regulatory Compliance:** We maintain detailed records of all verification attempts for regulatory audits and compliance reporting.

Parental Control & Internet Filtering

To further prevent underage access to gaming platforms, we encourage responsible adults to take proactive measures, including:

- **Safeguarding login credentials:** Protecting usernames, passwords, and payment details from unauthorized access.
 - Utilizing parental control tools: We recommend third-party software designed to block gambling content and restrict access for minors, such as
 - Net Nanny (www.netnanny.com)
 - GamBlock (www.gamblock.com)
 - CyberSitter (www.cybersitter.com)

By enforcing comprehensive age verification protocols and promoting parental control solutions, we remain committed to ensuring a safe and responsible gaming environment for all users.

Self-Assessment Tools

Players have access to their betting history and transaction records, allowing them to analyze their gambling habits and make informed decisions about their gaming behavior by offering comprehensive self-assessment tools, we empower players to identify early warning signs of problem gambling and take appropriate action to ensure responsible gaming habits.

Behaviour Tracking & Intervention

Our personnel, including customer service representatives and managers, play a crucial role in monitoring player behavior to detect potential signs of problem gambling. They analyze player interactions and patterns to identify at-risk behavior and take proactive measures.

When concerning behavior is detected, our trained responsible gaming specialists reach out to players, offering support tools such as deposit limits, cooling-off, and self-exclusion options. In more severe cases, mandatory account restrictions or enforced self-exclusion may be implemented to safeguard the player.

To strengthen our monitoring capabilities, we utilize a combination of human expertise and advanced technology, including:

- AI-driven analytics to track behavioral trends.
- Machine learning algorithms to detect irregular activity.
- In-game responsible gaming tools to help players manage their gambling habits.

Key Monitoring Indicators

Our system flags potential risk behaviors based on the following criteria:

- Deposit & Wagering Patterns – Identifying sudden increases in deposits, frequent high-stakes wagers, or irregular betting behavior.
- Use of Multiple Payment Methods – Monitoring players who use various payment methods, particularly when it appears to be an attempt to bypass deposit limits.
- Reversal of Withdrawals – Detecting players who frequently cancel withdrawal requests, which may indicate problematic gambling behavior.
- Extended Gaming Sessions – Monitoring players who engage in prolonged, uninterrupted gambling without taking breaks.
- Frequent Customer Support Interactions – Noting repeated contact with customer support, particularly for bonus requests or signs of frustration.
- Excessive Changes to Responsible Gaming Settings – Identifying players who frequently adjust deposit limits, use cooling-off periods, or modify other responsible gaming tools.
- High Spending Among Young Players – Closely monitoring players under 25 years old who exhibit significant spending patterns, particularly in casino or virtual games.
- Maxing Out Credit Cards – Flagging players who reach their credit limit and attempt to add additional cards.
- Unrealistic Spending Behavior – Identifying spending patterns that are inconsistent with the player's demographic profile.
- Attempts to Open Multiple Accounts – Preventing users from creating duplicate accounts to bypass deposit or loss limits.

By implementing robust monitoring strategies, we ensure that at-risk players receive timely intervention and appropriate support, reinforcing our commitment to responsible gaming and player well-being.

Player's Identification

Aspro N.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, cooling off, 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.

Staff Training & Responsible Gaming Awareness

To uphold responsible gaming standards, the company ensures that customer service and responsible gaming personnel receive comprehensive training to effectively identify, address, and assist players exhibiting signs of gambling distress.

Key Training Areas:

- Recognizing Gambling-Related Distress – Staff are trained to identify behavioral indicators such as agitation, aggression, financial strain, preoccupation with gambling, and significant increases in betting frequency or stakes.
- Engaging with At-Risk Players – Employees are equipped with effective communication strategies to conduct empathetic and structured conversations, helping players understand and manage their gambling behaviors.

- Guiding Players to Support Resources – Team members provide information on self-exclusion programs, deposit limits, cooling-off, and external support services, including counseling and helplines
- Maintaining Compliance & Documentation – All player interactions related to responsible gaming are thoroughly documented, ensuring regulatory compliance and enabling proper follow-up actions.

Ongoing Training & Evaluation

- Annual & As-Needed Training – Staff undergo mandatory training sessions at least once a year, with additional sessions conducted as needed.
- Continuous Updates – The training program is regularly revised to integrate industry best practices, regulatory changes, and stakeholder feedback.
- Performance Assessments – Training effectiveness is measured through pre- and post-training evaluations, ensuring that staff are well-equipped to support responsible gaming initiatives.

By prioritizing education and awareness, the company ensures that its team is fully prepared to assist players responsibly, promoting a safe and supportive gaming environment.

Escalation & Intervention Procedures

To strengthen player protection measures and ensure timely intervention in cases of potentially harmful gambling behavior, the Company maintains a structured Responsible Gaming Intervention and Escalation Framework. This framework establishes clear procedures for identifying, assessing, documenting, and responding to gambling-related risks in accordance with Curaçao Gaming Authority (CGA) responsible gaming expectations.

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

Whereas 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.

Under no circumstances will employees encourage continued gambling where indicators of problem gambling have been identified.

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.

Staff Responsibilities & Training

Employees involved in customer support, compliance, payments, VIP management, and player monitoring receive responsible gaming training to assist them in identifying and escalating potential indicators of gambling harm.

Training includes:

- Recognition of problematic gambling behaviour.
- Customer interaction procedures.

- Escalation and reporting obligations.
- Use of responsible gaming tools and controls.

Regulatory responsibilities under Curaçao Gaming Authority requirements.

Refresher training is conducted periodically to ensure continued effectiveness and regulatory compliance.

Cooling-Off Period: Responsible Gaming Commitment

As part of our commitment to responsible gaming, we ensure that players can access the cooling-off period feature easily, immediately, and without interference. If any technical or platform updates are required to implement this feature, we will provide manual support until a fully automated solution is in place. Cooling-off restrictions become effective immediately upon activation

Availability & Accessibility

Players can activate a cooling-off period for the following durations:

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

During this period, they will be temporarily restricted from all gambling activities across our platform. The cooling-off option is prominently displayed on our website and can be activated with a single click, eliminating the need for email requests or manual approval.

Immediate Activation & Restrictions

Once a player selects the cooling-off option, the following actions are applied immediately to reinforce responsible gaming:

- Clear Information on Options – Players are provided with details distinguishing a cooling-off period from self-exclusion, allowing them to choose the best-suited option.
- Instant Implementation – The restriction is enforced immediately to ensure players adhere to their decision.
- Temporary Account Suspension – The player's account is locked, preventing access to gambling activities for the selected period.
- Marketing & Promotions Opt-Out – Players can unsubscribe from promotional communications throughout their cooling-off duration.
- **Ethical Standards: No Interference or Pressure**

To uphold integrity and responsible gaming principles, our policy strictly prohibits any interference with a player's decision to take a break, including:

- ✗ Questioning the Player's Decision – The player's choice is fully respected, with no inquiries made.
- ✗ Persuasion or Delays – No attempts are made to delay or discourage the player from proceeding with their decision.
- ✗ Incentives to Continue Playing – We strictly refrain from offering bonuses, promotions, or rewards to encourage continued gambling.

Post-Cooling-Off Procedures

Once the selected cooling-off period ends, the following measures are implemented:

- ✓ Automatic Account Reactivation – The player's account is reinstated without additional steps required.
- ✓ Further Responsible Gaming Options – Players are reminded about additional responsible gaming tools, including cooling-off or self-exclusion, should they need continued restrictions.

These measures are designed to empower players with control over their gambling behavior, ensuring a safe, transparent, and responsible gaming experience.

Comprehensive Self-Exclusion Program

We have developed a robust and well-documented self-exclusion program designed to empower players in managing their gambling habits while minimizing potential harm. This initiative ensures that individuals who need a break from gambling have a clear, effective, and enforceable mechanism to do so.

Key Features of the Self-Exclusion Program

1. Immediate Implementation – Upon a player's request for self-exclusion, the restriction is applied instantly, preventing further access to gambling activities.
2. Self-Exclusion Register Maintenance – A dedicated Self-Exclusion Register is maintained, storing records of self-excluded players. These records are kept for a minimum of five years after the exclusion period ends, ensuring compliance with regulatory standards and enabling continued support.
3. Payment Method Restrictions – Any registered payment methods linked to self-excluded players are automatically blocked, preventing circumvention of self-exclusion measures. Comprehensive Support & Resources – Players who choose self-exclusion receive guidance and access to professional counseling services, helplines, and support groups to assist them in managing their gambling behavior.
4. Regular Program Evaluation – The self-exclusion program undergoes routine reviews to ensure its efficacy, regulatory compliance, and alignment with

industry best practices. Player feedback is actively used to enhance the program.

By implementing these measures, we strive to create a secure and responsible gaming environment, supporting individuals in maintaining control over their gambling behavior.

Self-Exclusion Process & Requirements

Accessibility & Transparency

To make self-exclusion as accessible and transparent as possible, we provide:

✓ **Prominent Visibility** – The self-exclusion option is clearly displayed on our website and player account settings.

✓ **Comprehensive Information** – Players receive clear instructions regarding:

- The step-by-step process to request and complete self-exclusion.
- Available self-exclusion duration options.
- The benefits of self-exclusion in managing gambling behavior.

Instant & Irreversible Implementation

- **Immediate Activation** – Players can self-exclude instantly online without requiring email confirmation, manual approval, or customer support intervention.
- **User-Friendly Process** – The self-exclusion process is streamlined and can be completed within 15 minutes.
- **Fraud Prevention** – Advanced verification measures are in place to detect duplicate accounts and prevent self-excluded players from creating new accounts using different credentials.
- **Comprehensive Blocking** – Once a player is self-excluded, they are restricted across all company platforms and encouraged to enroll in national self-exclusion schemes for broader protection.

Self-Exclusion Durations & Restrictions

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

1 Year

3 Years

5 Years

10 Years

Lifetime Self-Exclusion

- Instant Enforcement – Once a request for self-exclusion is submitted, it is applied immediately without delay.
- Ethical Implementation – We strictly prohibit any actions that may discourage self-exclusion, including:

Questioning the player's decision.

Offering bonuses, promotions, or incentives to continue playing.

Providing reassurances or suggestions to reconsider the decision.

Delaying or obstructing the self-exclusion request.

- Irreversible Commitment – Once self-exclusion is activated, it cannot be revoked or shortened before the designated period ends.
- Customizable Exclusion – Players may choose to self-exclude from specific gaming products (e.g., casino, sportsbook, poker) or opt for a full exclusion from all gambling activities on our platform.

By enforcing a strict and transparent self-exclusion policy, we ensure that players have full control over their gambling choices, reinforcing our commitment to responsible gaming and player well-being.

Post – Exclusion Protocols

Full Self-Exclusion Measures

When a player opts for full self-exclusion across all gaming verticals, the following actions are immediately enforced:

- ✓ Transaction Blocking – All gambling-related transactions are halted to prevent further activity.
- ✓ Account Suspension – The player's account is deactivated, restricting access to all gaming services.
- ✓ Fund Reconciliation – Any remaining withdrawable funds (except those subject to Anti-Money Laundering (AML) restrictions) will be refunded to the original payment method within two business days.
- ✓ Marketing & Promotional Opt-Out – The player is permanently removed from all marketing, promotional, and advertising communications.

Partial Self-Exclusion

For players who choose to self-exclude from specific gaming verticals (e.g., casino, sportsbook, poker), the following measures apply:

- ✓ Targeted Restrictions – Access to restricted products is blocked, while approved

products remain accessible.

Reactivation & Post-Exclusion Protocols

At the conclusion of the self-exclusion period, players must complete the following steps before account reactivation:

- ✓ Formal Reactivation Request – Players must submit a written request to reinstate their account.
- ✓ Responsible Gaming Support – Before reactivation, players receive guidance on responsible gaming tools, including deposit limits, and other protective measures.
- ✓ Gambling Awareness Questionnaire – Players are required to complete a self-assessment questionnaire to evaluate their gambling habits and ensure informed decision-making.
- ✓ Account Reactivation with Original Credentials – The player's account is restored under the original registered details, preventing circumvention of prior exclusions.

These policies ensure that self-exclusion remains a powerful and effective tool for players seeking control over their gambling habits, reinforcing a safer and more responsible gaming environment.

Marketing & Communication Restrictions

The following communication restrictions apply:

- ✗ Limited Contact – Players will only receive essential, non-promotional communication, such as legal notifications or regulatory updates
- ✗ No Marketing or Incentives – Self-excluded players will not receive any promotional materials, bonus offers, free play incentives, or advertisements.
- ✗ Controlled Reactivation – While cooling-off periods automatically expire, self-exclusion requires explicit player action for account reinstatement.

Compliance & Regulatory Obligations

To maintain full compliance with responsible gaming regulations, all self-exclusion activities are monitored and documented in real time. If a self-excluded player or underage individual gains access to gambling services in violation of their exclusion settings, the following actions are taken:

- ✓ Deposit Refunds – Any deposited funds (excluding those restricted by AML policies) will be returned within two business days.
- ✓ Immediate Account Suspension – The account will be permanently blocked to prevent further access.

✓ Regulatory Reporting – A formal incident report will be submitted to the relevant gaming authority within five working days.

Operator-Initiated Exclusion

In some instances, the company may proactively exclude a player as part of its high-risk intervention strategy under the following conditions:

- ✓ Problem Gambling Indicators – The player displays compulsive or high-risk gambling behavior.
- ✓ Suspicious or Criminal Activity – The player is found to be engaged in fraudulent, illegal, or unethical activities on the platform.

All cases of operator-initiated exclusions are formally documented, with records retained for a minimum of five years, ensuring regulatory compliance and responsible gaming enforcement.

These strict exclusion policies reinforce our commitment to responsible gaming, ensuring a secure and ethical gaming environment for all players.

Player – Controlled Limits

To support responsible gaming, we provide a comprehensive set of tools that allow players to manage their gambling activities effectively. These tools include the ability to set and modify deposit limits on a daily, weekly, or monthly basis, ensuring players have full control over their spending.

Deposit & Other Limits

✓ Deposit Limits – Players can set a maximum deposit amount for a chosen period (daily, weekly, or monthly). Once the limit is reached, no further deposits will be allowed until the limit resets.

✓ Modifying Limits:

- Decreasing Limits – Players can lower their deposit limits at any time, with changes taking immediate effect, allowing them to reduce spending promptly.
- Increasing Limits – Requests to raise deposit limits are subject to a mandatory seven-day waiting period, ensuring that changes are made with careful consideration rather than impulse.

By offering these customizable control features, we empower players to manage their gambling responsibly, fostering a safer, more enjoyable gaming experience.

Reality Check

To promote responsible gambling, we have introduced comprehensive reality check feature – Real-Time Session Timer that enables players to monitor and manage their gaming activities effectively.

#Real-Time Session Timer is a visible on-screen timer continuously tracks the duration of each gaming session, helping players stay aware of how much time they spend on the platform.

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

Marketing and Advertising

We are committed to responsible gaming principles in all our marketing and advertising efforts. To protect players and uphold ethical standards, direct marketing (including emails, SMS, and push notifications) is strictly prohibited during active cooling-off or self-exclusion periods.

Advertising & Marketing Guidelines

We ensure that all marketing communications adhere to the following responsible gaming standards:

- ✓ No aggressive, misleading, or irresponsible advertising.
- ✓ No targeting of vulnerable individuals, including minors or problem gamblers.
- ✓ No portrayal of gambling as an investment opportunity or a way to achieve financial success.
- ✓ No use of emotional manipulation or misleading claims regarding the role of skill vs. chance in gambling outcomes.

Affiliate & Social Media Advertising

- ✓ Affiliates must comply with all responsible gaming policies and industry regulations.
- ✓ Social media influencers must be legally eligible, have an appropriate audience, and refrain from sexually provocative or misleading content.
- ✓ Sponsorships must not be directed at vulnerable groups, minors, or events aimed at young audiences.

This policy reinforces our commitment to responsible marketing practices and ensures compliance with regulatory standards. It is subject to regular reviews and updates, with all revisions requiring approval from the Board of Directors.