

1. Introduction

This Responsible Gaming Policy sets forth the principles, responsibilities, and operational framework adopted by Magic Stones N.V. – the operator of the Magic365.com platform – to promote the safety, well-being, and informed decision-making of all players engaging with its services. The Policy is designed to prevent gambling-related harm and ensure a fair, transparent, and ethical gaming environment.

It is implemented in accordance with the legal obligations established under the National Ordinance on Games of Chance (LOK), the Curacao Gaming Authority (CGA) guidance issued on 21 February 2025, and other relevant international standards, including those set by FATF, EGBA, and RGC. Through this Policy, Magic Stones N.V. reaffirms its commitment to protecting vulnerable players, fostering a culture of responsible play, and maintaining regulatory compliance across all aspects of its operations.

Magic Stones N.V. commits to integrating the principles of responsible gaming throughout its technical infrastructure, internal controls, customer interactions, and compliance functions. The primary goal of this Policy is to identify, prevent, and mitigate gambling-related harm, ensure the protection of vulnerable individuals (including minors and persons at risk of gambling addiction), and establish transparent, accountable processes for responsible gambling management.

This Policy applies to all brands operated under the Magic365.com domain, and to all staff, affiliates, and third-party partners involved in the delivery of gaming services to end users. It is reviewed annually and whenever changes to legislation or operational structure warrant an update.

The provisions of this Policy are binding on all relevant personnel and are to be implemented in coordination with other internal policies, including AML/CFT, KYC, UTR, Privacy, and Complaints Handling frameworks.

2. Policy Objectives

This Responsible Gaming Policy sets out clear objectives to guide the Company's operations toward responsible and sustainable gambling practices. The core purpose is to identify, prevent, and mitigate gambling-related harm by embedding risk controls, player empowerment tools, and safeguards into all aspects of Magic Stones N.V.'s business processes.

The Policy strengthens the Company's commitment to transparency, informed decision-making, and player welfare. It fosters a culture where gambling is treated as a form of entertainment that should never compromise individual health, financial stability, or social relationships.

These objectives are firmly anchored in the regulatory framework of Curaçao, including the National Ordinance on Games of Chance (LOK), the National Ordinance on the Identification of Service Users (NOIS), and the National Ordinance on the Reporting of Unusual Transactions (NORUT), along with obligations under AML/CFT/CPF compliance.

Additionally, the Company aligns with globally recognized standards and practices issued by expert bodies in the field of responsible gambling, ensuring a consistent, ethical, and protective approach across its technological infrastructure, player interfaces, and compliance systems.

The Company further aligns with international standards and guidelines issued by recognized authorities in responsible gaming, ensuring best practices are consistently upheld across technical systems, customer interaction channels, and compliance functions.

3. Player Information and Communication

Magic Stones N.V. ensures that all players have unrestricted and ongoing access to responsible gaming information through multiple channels, both before and after registration. Prior to account creation, the website displays clear and easily accessible content describing the risks of gambling, available control tools, and contact information for assistance services.

After registration, each player is provided with a dedicated Responsible Gaming section within their personal dashboard. This interface contains a clear summary of the responsible gaming policy, an overview of the player's current self-imposed limits (deposit, loss, wager, and session time), a log of past limit modifications and self-exclusions, session durations, transaction history, and the results of any self-assessment tests undertaken.

The interface also includes prominently displayed, clickable links to reputable international support organizations.

These include:

- BeGambleAware (www.begambleaware.org): an independent charity that provides information and support for those at risk of problem gambling. It offers self-assessment tools, educational resources, and access to confidential help services.
- GamCare (www.gamcare.org.uk): a leading UK provider of information, advice, and support for anyone affected by gambling harms. GamCare also operates the National Gambling Helpline and offers free treatment for problem gamblers.
- Gamblers Anonymous (www.gamblersanonymous.org.uk): a fellowship of men and women who share their experiences and support each other to recover from problem gambling. The organization operates regional meetings globally.
- Gambling Therapy (www.gamblingtherapy.org): offers multilingual support and counseling services to individuals impacted by gambling, both within the UK and internationally.
- Responsible Gambling Council (www.responsiblegambling.org): a non-profit organization based in Canada that provides evidence-based prevention programs, research, and policy development for safer gambling worldwide.
- National Council on Problem Gambling (www.ncpgambling.org): provides 24/7 confidential support services and public awareness initiatives focused on preventing and treating problem gambling in the U.S.

- Gamtalk (www.gamtalk.org): an online support community for individuals recovering from problem gambling. It features recovery stories, peer interaction, and moderated forums for anonymous assistance.
- Gordon Moody Association (www.gordonmoody.org.uk): provides intensive residential and online treatment for individuals struggling with gambling addiction. Its services are available to both men and women aged 18+.
- Keep It Fun (www.keepitfun.rank.com): an informational resource developed by a UK-based gambling operator, offering practical advice for maintaining control over gambling and accessing support when needed.

These links are clearly labeled, easily accessible in English and Dutch, and regularly verified for functionality and accuracy in line with CGA requirements.

All responsible gaming materials are written in plain language, accessible on both desktop and mobile devices, and designed in accordance with digital accessibility standards (WCAG 2.1, level AA). Content is also adapted for target jurisdictions where required by local law or operational scope.

Finally, references and links to responsible gaming protections are integrated into all key legal documents of the Company, including its Terms and Conditions, Privacy Policy, and AML/KYC procedures, ensuring full consistency across all compliance frameworks. Information is presented in a non-technical style and complies with digital accessibility standards.

4. Responsible Gaming Tools

Magic Stones N.V. provides players with a comprehensive and mandatory suite of responsible gaming tools, which are fully integrated into the Responsible Gaming Portal within each player's user account. These tools are designed to support informed decision-making, self-regulation, and early intervention.

- Players can set the following limits:
 - Deposit limits: to control the total amount of funds deposited over a specified period
 - Loss limits: to restrict the maximum net losses within a defined timeframe.
 - Wager limits: to limit the amount wagered per game or session.
 - Session time limits: to cap the length of individual playing sessions.

Limits must be configured voluntarily by the player, with the option to apply them on a daily, weekly, or monthly basis. Any increase in limit values is subject to a mandatory cooling-off period of at least 24 hours before it takes effect, while any reduction is applied immediately. Players receive automated notifications when approaching active limits.

Time-outs allow players to temporarily suspend access to their accounts for preset periods of **24 hours, 7 days, or 30 days**.

During this time, no deposits, wagers, bonuses, or promotional activities are allowed. Reactivation occurs automatically at the end of the selected period, without the option to

override or cancel early. Each time-out activation is accompanied by a disclaimer explaining the consequences, and players must confirm understanding before activation.

Self-exclusion is available for periods of 6 months, 1 year, or permanent duration.

Once activated, self-exclusion takes immediate effect and cannot be reversed until the expiry of the selected period. During exclusion, the account is completely deactivated, marketing communications are disabled, and all efforts are made to prevent new registrations, including device and IP-based controls.

Reactivation is only possible through a formal written request and a post-exclusion risk assessment. Permanent exclusions are strongly encouraged for individuals at high risk.

Players are provided with a self-assessment questionnaire (e.g., GamTest), which is designed to help identify early signs of gambling-related harm.

Sample questions include:

- Does gambling interfere with your work or studies?
- Do you gamble to pass time or avoid boredom?
- Do you gamble alone for extended periods?
- Has anyone told you that you spend too much time gambling?
- Have you reduced time with family or friends because of gambling?
- Have you ever lied about how much time or money you spent gambling?
- Have you ever stolen or lied to fund your gambling?
- Are you reluctant to spend your 'gambling money' on anything else?
- Do you often continue gambling until all your money is gone?
- Do you often feel the urge to win back losses immediately?
- Do you feel confused or desperate after losing money?
- Do problems, disappointments, or frustrations trigger gambling urges?
- Has gambling led to depression or thoughts of self-harm?

The results of each test are securely stored in the player's profile and made accessible to the player for future review. Where test responses indicate potential vulnerability, the account is flagged for further monitoring by the Responsible Gaming Officer (RGO) or, where appropriate, the Money Laundering Reporting Officer (MLRO).

Players also have continuous access to their full gambling history, including bets placed, deposits, losses, session lengths, and all limit or exclusion changes. This supports transparent self-evaluation and enables informed decision-making.

All tools must be fully accessible and operable without staff intervention. The Portal functions on both desktop and mobile platforms and is available 24/7. Tools are designed in accordance with the usability and accessibility standards outlined in WCAG 2.1, Level AA.

Prior to the release of any new product, feature, or promotional campaign, the Company conducts a Responsible Gaming risk assessment. This includes evaluating frequency of play, reward mechanics, risk of loss obfuscation, and user demographics. Results are recorded in the internal Product Risk Review Register and made available to the CGA upon request.

5. Behavioural Monitoring and Player Protection

Magic Stones N.V. operates a robust and multi-layered behavioural monitoring framework as a core pillar of its Responsible Gaming Policy. This framework is fully aligned with the CGA Responsible Gaming Policy and enforced through Articles 1.4(e), 5.1, and 6.1 of the National Ordinance on Games of Chance (LOK).

The Company is obligated to prevent individuals who may reasonably be considered vulnerable from participating in gambling activities. To this end, the Company employs automated and manual systems to monitor in real-time a wide array of behavioural risk indicators. These include: – Significant increases in deposit or betting frequency; – Repeated reversals of withdrawals; – Unusually long play sessions without breaks; – Attempts to bypass established limits or register multiple accounts; – Emotional volatility in communications with support, such as anxiety or aggression; – Excessive changes to self-imposed limits; – High losses among players aged under 25; – Usage of fully leveraged credit cards; – Discrepancies between user profiles and gambling behaviour.

When risk indicators are identified, the operator must initiate direct intervention. Trained Responsible Gaming personnel will engage the player, propose activation of protective tools (such as limits or exclusions), and assess the need for temporary suspension or enhanced monitoring. All contacts and actions are documented in the Player Account Management (PAM) system, and cases are escalated to the Responsible Gaming Officer (RGO) or Compliance Officer where appropriate.

Behavioural incidents must be classified for risk severity and logged in a Risk Event Register. When patterns suggest serious or escalating harm, the operator must notify the CGA and include the incident in its Responsible Gaming annual report or ad hoc filings upon request.

Additionally, any behavioural patterns that coincide with irregular financial activity—such as unusual deposits, third-party payment methods, or rapid cycling of funds—must be assessed for potential money laundering. If these conditions are met, the case may constitute a reportable event under Article 2 of NORUT and must be submitted to the FIU via the GoAML system. All such decisions require documentation and internal sign-off.

The Company is permitted to use automated systems, AI modules, and behavioural analytics software (e.g., Mindway AI, Neccton) for flagging suspicious behaviour. However, pursuant to Section 4.4.2 of the CGA Responsible Gaming Policy, no AI system may be used to adjudicate complaints related to responsible gaming or to make final decisions regarding player well-being. All such matters must be handled manually by trained staff.

Players must also be informed of their right to escalate responsible gaming decisions to a senior officer, such as the licensed Director. If unsatisfied, they may further appeal to an accredited independent ADR provider.

The behavioural monitoring program is subject to mandatory internal audits and must be reviewed no less than once per year. Adjustments to monitoring protocols must be made in response to product launches, observed risk trends, or regulatory updates. All monitoring tools and procedures must be integrated with the operator's AML Governance Framework,

with established cooperation channels between the MLRO and RGO, including shared access to case records and joint evaluation workflows.

Full accountability for monitoring remains with the operator, including when third-party technologies are used. Only solutions that meet CGA standards for confidentiality, independence, and auditability are permitted.

By implementing these standards, Magic Stones N.V. ensures that its behavioural monitoring framework serves as a proactive and protective measure—safeguarding player welfare, mitigating systemic risk, and maintaining the highest standard of regulatory compliance

6. Age Verification and Protection of Minors

Magic Stones N.V. maintains a zero-tolerance approach to underage gambling. Access to gaming services is strictly prohibited for any individual under the age of 18. Verification of age and identity is mandatory and must be completed prior to allowing access to any gaming services, including deposits and gameplay.

The Company employs a robust age verification process as part of its Know Your Customer (KYC) procedures. This includes validation of official identity documents (such as passports, national IDs, or driver's licenses), facial recognition, and other biometric checks where necessary. Visual and systemic indicators of age are reviewed, and any discrepancies result in immediate suspension of the player account pending enhanced due diligence.

If it is confirmed that a minor has registered or accessed gaming services, the account is permanently closed, all deposited funds (excluding any funds flagged under AML procedures) are returned, and any winnings are voided. The incident is recorded as a compliance breach and reported to the Curaçao Gaming Authority (CGA). Where applicable, the Company may also submit a report to the Financial Intelligence Unit (FIU) under the National Ordinance on the Reporting of Unusual Transactions (NORUT), referencing identity fraud risk scenarios.

Magic365.com performs random account checks to verify player age and compliance with KYC requirements. If any breach is detected during such inspections, accounts are immediately terminated and all funds confiscated. Repeat attempts or fraudulent registrations are treated as serious violations and handled accordingly.

The Company includes clearly visible age restriction notices on its website and offers external parental control resources, such as Net Nanny™: www.netnanny.com, GamBlock™: www.gamblock.com, and CyberSitter, to assist parents in preventing minors from accessing gambling content.

Systems are configured to detect repeated attempts at registration using modified data, IP spoofing, or device manipulation. If it is determined that a previously banned underage player is attempting re-entry, the account is flagged and the case escalated to the compliance department for reporting.

All actions related to age verification and prevention of underage gambling are documented and retained for at least five years and made available for audit upon request by the CGA or FIU. The Company also conducts annual internal reviews to evaluate the effectiveness of its underage gambling prevention measures. Summaries of such reviews may be published on the official site at the CGA's request

7. Complaints, ADR, and Responsible Gaming Escalations

Magic Stones N.V. maintains a structured process for handling all player complaints, including those related to responsible gaming. Complaints may be submitted through the official channel described in the Complaints Policy and are processed in a timely, transparent, and professional manner.

Complaints involving responsible gaming are treated with the highest priority and are never handled through automated systems or artificial intelligence. All such cases are manually reviewed by trained staff and, where necessary, escalated directly to the Responsible Gaming Officer (RGO).

The RGO has explicit authority to intervene in any dispute involving signs of problematic gambling behavior, including failure of limit enforcement, improper self-exclusion handling, or inadequate intervention in high-risk cases. If the RGO determines that the Company's responsible gaming protocols were not effectively applied, immediate remediation steps are initiated.

Complaints concerning marketing communications—such as misleading content, irresponsible messaging, or targeting of vulnerable individuals—are considered part of the responsible gaming framework and are likewise escalated to the RGO. The Company prohibits promotional materials that portray gambling as a financial solution or social success mechanism and ensures that all affiliate and third-party campaigns comply with responsible gaming standards.

All responsible gaming complaints are logged in the internal compliance system and retained for no fewer than five years. If a player is dissatisfied with the resolution, the matter may be escalated to an approved independent Alternative Dispute Resolution (ADR) provider. ADR services are provided free of charge to the player and are staffed by specialists with expertise in gambling and consumer protection.

Where responsible gaming complaints intersect with broader risk indicators—such as financial abuse, identity fraud, or suspected money laundering—the RGO coordinates directly with the Money Laundering Reporting Officer (MLRO) to assess the case jointly. If functions are held by separate individuals, procedures are in place to ensure timely information exchange, collaborative risk assessment, and consistent recordkeeping across both governance domains.

The RGO is further responsible for monitoring the overall complaint handling performance of the Company in relation to responsible gaming. At least once per year, the RGO submits a detailed internal report to senior management, summarizing complaint trends, deficiencies identified, corrective actions taken, and recommendations for policy or system updates. In

serious incidents or upon request from the Curaçao Gaming Authority, a special report must be submitted without delay.

The Company ensures that the RGO's appointment is formally documented, with responsibilities clearly defined. The RGO's name, title, and contact information are recorded in the licensing file or Certificate of Operations and must be made available to the CGA on request.

All complaint handling procedures are aligned with the internal AML Governance Framework, and any case that may qualify as a suspicious transaction under NORUT is reviewed for possible escalation to the Financial Intelligence Unit.

8. Responsible Gaming Officer (RGO) and MLRO Accountability

The Company formally appoints a Responsible Gaming Officer (RGO) with direct responsibility for overseeing the implementation, monitoring, and continuous improvement of this Responsible Gaming Policy. In cases where the role of RGO is combined with the Money Laundering Reporting Officer (MLRO), the operator must ensure this dual appointment does not result in conflicts of interest, duplicated tasks, or a reduction in operational control. If separate individuals hold these positions, the roles and responsibilities of each must be clearly documented, including protocols for data sharing and joint escalation of cases involving both AML and RG risk indicators.

The RGO is entrusted with the following responsibilities: – Ensuring operational implementation of all responsible gaming measures, including limit functionality, self-exclusion tools, behavioral monitoring systems, and staff conduct protocols; – Preparing and delivering an annual report to senior management evaluating the effectiveness of the Policy, identifying implementation gaps, and recommending improvements. Reports must also be submitted promptly in the event of a major incident or upon CGA request; – Acting as the primary liaison with the CGA on all responsible gaming matters, including response to player complaints, regulatory inquiries, and submission of supporting documentation; – Managing the resolution of disputes and complaints that relate to responsible gaming, with authority to override decisions where necessary to protect player well-being; – Monitoring external guidance and regulatory updates from CGA, EGBA, FATF, RGC, and other relevant bodies, and initiating internal Policy updates as required.

The RGO's appointment must be formalized through internal documentation outlining their authority and scope of duties. Their name, title, and contact information must be reflected in the Company's license documentation and made available to CGA upon request.

9. Integration with AML/CFT and Customer Due Diligence (CDD)

Responsible Gaming measures are an integral component of the Company's AML/CFT/CPF compliance framework. Behavioral anomalies identified through Responsible Gaming protocols—such as compulsive play, inconsistent financial activity, or attempts to bypass controls—may indicate not only problematic gambling but also suspicious financial behavior requiring regulatory escalation.

Magic Stones N.V. systematically evaluates gambling-related behavioral data within the scope of ongoing monitoring, as required under the CGA AML/CFT/CPF Manual. When multiple vulnerability indicators are observed (e.g., excessive losses combined with insufficient documentation on Source of Funds or Source of Wealth), the operator immediately escalates the customer's risk classification and initiates enhanced due diligence (EDD). EDD includes additional document requests (ID, proof of residence, SoF/SoW), transaction scrutiny, and potential account restrictions.

If signs of financial abuse or money laundering coincide with problematic gambling behavior, the MLRO and RGO jointly review the case and determine the necessity of filing a Suspicious Activity Report (SAR) or Unusual Transaction Report (UTR) to the Financial Intelligence Unit (FIU) via the GoAML system. All such decisions must be documented with reference to both RG and AML indicators and preserved in the player's compliance file.

In cases where behavioral patterns raise concerns related to proliferation financing (CPF), the Company activates risk-based restrictions in accordance with Section 9.1 of the CGA AML Manual 2025, including temporary suspension of transactions pending further review.

Magic Stones N.V. enforces a strict prohibition on deprioritizing AML triggers under the pretext of responsible gaming concerns. Dependency status does not exempt the player or the operator from obligations to verify the legality of transactions. All joint RG/AML escalations are logged, audited, and preserved for a minimum of five years, and are available for inspection by the CGA or FIU upon request.

10. Staff Training and Awareness

Magic Stones N.V. maintains a mandatory training program designed to ensure that all employees, contractors, and third-party representatives—such as affiliates, social media moderators, and marketing agents—understand and are capable of fulfilling their obligations under this Responsible Gaming Policy. Training is conducted upon onboarding and is regularly updated to reflect changes in regulatory requirements, internal procedures, and risk indicators.

The training program includes the following core components:

10.1. Recognition of Gambling-Related Harm: Employees are trained to identify behavioral indicators of problematic gambling, including frequent or escalating deposits, prolonged play sessions, visible agitation or aggression during support interactions, repeated requests to modify or remove limits, use of multiple payment instruments, and behavioral signs such as sleep disruption or distress.

10.2. Ethical and Professional Interaction: Staff are taught how to communicate responsibly, with empathy and discretion, particularly when encouraging players to consider self-limitation measures, take time-outs, or opt for self-exclusion. Dialogue must be supportive and non-coercive.

10.3. Mastery of RG Tools and Interfaces: All relevant personnel are provided with a comprehensive understanding of the responsible gaming tools available on the platform,

including how to explain the purpose, activation process, and consequences of deposit limits, loss limits, time-outs, self-exclusion, and behavioral self-assessment tools.

10.4. Documentation of Player Interaction: Any employee who engages with a player displaying problematic behavior must document the nature of the interaction in the Player Account Management (PAM) system. These records are made available to the RGO and/or Compliance Officer for follow-up, escalation, and trend analysis.

10.5. Periodic Training and Recertification: Refresher training is delivered at least annually. In cases of updates to CGA guidelines, the LOK, or internal policy changes, updated training sessions are delivered without delay.

10.5. Training Records and Auditability: All training materials, participation logs, and assessment results are retained in the internal control system and made available for audit by the CGA upon request. The Company treats insufficient or absent training as a serious compliance failure.

By equipping staff with the knowledge, sensitivity, and technical skills necessary to support responsible gaming, Magic Stones N.V. strengthens its commitment to player protection and ensures consistent execution of this Policy across all operational layers.

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Approved by the Board of Directors of Magic Stones N.V.



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