

Responsible Gaming Policy

This Responsible Gaming Policy (hereinafter – the “Policy”) is adopted by Magic Stones N.V. (company number: 155186), a company registered at Seru Loraweg 17 C, Willemstad, Curaçao, license number OGL/2024/566/0462 in line with the requirements of the National Ordinance on Games of Chance (LOK), the Curaçao Gaming Authority (CGA) guidance, and other relevant international standards.

1. Introduction

This Policy forms an integral part of the Terms and Conditions governing the use of the Company's gambling platform <https://magic365.com/>. It sets out the principles and procedures adopted by the Company to promote responsible gambling and to minimize the risks associated with gambling activities.

The Company recognizes that, while gambling is an enjoyable form of entertainment for most players, it may lead to financial, social, or personal harm for some individuals. For this reason, the Company is committed to providing a safe, fair, and transparent gaming environment and to taking reasonable steps to protect players from gambling-related harm.

This Policy applies to all the services offered by the Company and forms part of the Company's overall compliance framework. It establishes the measures implemented to prevent underage gambling, support players who may be at risk of developing gambling-related problems, and ensure compliance with all applicable legal and regulatory requirements.

2. Purpose

The purpose of this Policy is to ensure that gambling is offered as a form of entertainment and is enjoyed in a responsible manner. To achieve this, the Company has implemented measures to protect vulnerable persons, prevent access to gambling by individuals under the legal age, and identify and respond to signs of problem gambling. The Company is committed to promoting responsible gaming and maintaining appropriate procedures and controls to provide a fair and secure gaming environment for all players.

3. Prevention of Underage Gambling

3.1 Strict Prohibition. The Company maintains a zero-tolerance policy regarding underage gambling. Participation in any gambling activities is strictly prohibited for persons under the age of 18, or the legal minimum age as defined by the jurisdiction of the player's residence, whichever is higher.

3.2 Verification at Registration. During the account registration process, all applicants are required to confirm their date of birth and formally declare they have reached the legal age of majority. Access to the platform is contingent upon this self-attestation. The Company conducts a thorough due diligence to authenticate these claims in accordance with established Know Your Customer (KYC) and Anti-Money Laundering (AML) protocols.

3.3 Documentary Evidence. A valid, government-issued identification document (e.g., passport, national ID card, or driver's license) must be provided to verify the player's age and identity.

This verification is mandatory upon reaching specified financial thresholds and is a prerequisite for the processing of any initial withdrawal request.

3.4 Enhanced Validation Tools. To ensure the integrity of the age verification process, the Company may employ supplementary validation methods.

3.5 Enforcement and Sanctions. Should a player be identified as being under the legal gambling age, the Company shall execute the following actions without delay:

- Immediate and permanent termination of the player's account.
- Voiding of all wagers and forfeiture of any accrued winnings.
- Reporting of the incident to relevant regulatory bodies where required by law.

3.6 Record Keeping. The Company shall maintain comprehensive records of all age verification attempts, results, and subsequent actions. These records are preserved for a period required by law and are made available for inspection by the Curaçao Gaming Authority (CGA) and other relevant regulatory bodies upon request.

4. Behavior Tracking & Risk Assessment

The Company actively monitors player activity to identify indicators of problematic gambling. Monitoring is carried out by customer support staff and is supported by automated monitoring and analytical tools, where appropriate. The Key Monitoring Factors are the following:

Factor	Indicator of Concern
Frequency	Sudden, unexplained increases in wagering or session length.
Financial transactions	Repeated failed transactions due to insufficient funds; maxing out credit cards.
Withdrawals	Frequent cancellation of withdrawal requests (reversing withdrawals).
Engagement	Aggressive or unreasonable communication with support; obsessive bonus requests.
Limits	Frequent changing of limits or repeated use of cooling-off periods to bypass limits.

The Company reserves the right to use automated or manual pop-up notifications to address player behavior that may indicate actual or potential gambling-related harm.

Pop-up notifications may be triggered based on identified risk indicators, including, but not limited to, extended gaming sessions without breaks, significant increases in deposits or wagering activity, repeated requests to increase limits, frequent use of cooling-off periods, repeated cancellation of withdrawals, failed payment attempts, attempts to create or use multiple accounts, signs of distress or frustration in communications with customer support, requests for bonuses following losses, or attempts to bypass existing responsible gaming restrictions.

Such notifications may provide players with information regarding their gambling activity, encourage them to take a break, remind them of available responsible gaming tools, recommend setting or reducing limits, provide options to activate a cooling-off period or self-exclusion, or direct players to available support resources.

Where a player's behavior indicates a High Risk or Critical Risk level, pop-up notifications shall not be considered a substitute for further responsible gaming intervention. In such cases, the Company

shall conduct an appropriate review and may escalate the matter to the Compliance Officer for further assessment and action.

5. Realty Check Measures

The Company may implement Realty Check measures to assist players in maintaining awareness of their gambling activity, including the time spent playing and the funds wagered, won, or lost during a gaming session. Realty Check measures are intended to support informed decision-making and promote responsible gambling behavior. They shall not be designed or implemented in a manner that encourages excessive gambling or discourages players from taking breaks.

Realty Check includes a visible session timer displayed while the player is logged in or participating in gambling activities, a clock showing the player's local time zone, periodic notifications regarding session duration, and player-configurable reminders that may be activated at selected intervals. Realty Check notifications provides clear and understandable information regarding the duration of the player's session and relevant information regarding the player's gambling activity, including winnings and losses during the applicable period. Where a player-activated Realty Check is triggered, the player may be required to acknowledge the message before resuming play.

Where appropriate, Realty Check messages may provide players with options to continue playing, take a break, review responsible gaming tools, set or adjust limits, activate a cooling-off period, initiate self-exclusion, or contact customer support.

6. Risk Assessment

Based on the results of behavioral monitoring and risk assessment, players may be classified into different risk categories. The classification allows the Company to apply proportionate responsible gaming measures:

a) Low Risk Player. A player who demonstrates normal gambling behavior with no significant indicators of potential gambling-related harm. Standard monitoring and responsible gaming information apply.

b) Medium Risk Player. A player showing one or more indicators that may suggest increased risk, such as noticeable changes in gambling patterns, increased wagering activity, frequent limit adjustments, or signs of emotional involvement. The Company may apply additional monitoring, provide responsible gaming information, and encourage the use of available player protection tools.

c) High Risk Player. A player displaying multiple or serious indicators of potential gambling harm, including significant increases in gambling activity, chasing losses, signs of financial difficulty, attempts to bypass restrictions, or behavior suggesting loss of control over gambling.

d) Critical Risk Player. A player classified as Critical Risk demonstrates severe and immediate indicators of potential gambling-related harm or presents a significant compliance concern. Such indicators may include, but are not limited to, clear signs of loss of control, persistent and escalating gambling despite previous interventions, significant financial distress, repeated attempts to circumvent responsible gaming measures, evidence of gambling-related harm, or suspected fraudulent or criminal activity connected with the use of the platform.

When at-risk behavior is identified, the following protocol is triggered:

Direct Interaction: A trained RG professional contact the player to advise a review of their behavior.

Escalation: Where appropriate, the case is escalated to the Compliance Officer or Responsible Gaming Officer for assessment and application of proportionate restrictive measures.

Exclusion: Permanent exclusion in cases of severe or persistent risk.

For High and Critical Risk Players, the Company shall apply immediate and enhanced responsible gaming measures.

The Company shall document risk assessments, actions taken, and the outcome of any responsible gaming interventions. All Responsible Gaming interactions—whether initiated by the player or the operator are recorded in the Player Account Management (PAM) system, along with the indicators of concern and any actions taken. Records shall be maintained in accordance with applicable regulatory requirements and made available to the relevant authorities upon request.

7. Restrictive Measures

The Company applies responsible gaming measures on a proportionate, risk-based and documented basis where there are reasonable grounds to identify actual or potential gambling-related harm. In accordance with the principles of responsible gaming and the requirements of the Curaçao Gaming Authority (CGA), the Company reserves the right to apply appropriate restrictions to a player's account where there are reasonable grounds to believe that the player may be at risk of gambling-related harm. The Company wants to make sure everyone's having a good time and staying safe!

a) Preventive restrictions. Where indicators of excessive or harmful gambling are identified, the Company may, without the player's consent:

- impose or reduce deposit, wagering, or loss limits;
- restrict or remove access to bonuses and promotional offers; and
- limit the duration of gaming sessions.

b) Temporary account suspension. The Company may temporarily suspend a player's account where it reasonably believes that continued gambling may result in financial or personal harm. During the suspension, the player will not be able to deposit funds, place wagers, or access gambling services. The Company will inform the player of the reasons for the suspension and provide information about available support.

c) Operator-Initiated Exclusion. In exceptional circumstances, including where there is evidence of persistent gambling addiction or suspected criminal or fraudulent activity, the Company may permanently exclude a player without the player's consent. Such exclusion may include closure of all player accounts, refusal to open new accounts, suspension of marketing communications, and denial of access to the Company's gambling services.

8. Revocation of the Restrictive Measures

Any decision to take action is recorded and subject to internal review. A player's account can only be reactivated after a temporary suspension or other restrictions if:

- i) the case has been reviewed by a responsible manager and
- ii) no signs of risky gambling behavior were detected.

An Operator – Initiated Exclusion can only be revoked in exceptional cases and after a formal internal risk assessment.

9. Transparency and Support

If the Company applies any of the restrictive measures described above, the player will be notified in writing of the reasons for the decision. Where appropriate, the Company will also provide information about responsible gaming tools and direct the player to professional organizations that offer support and assistance for gambling-related problems.

10. Self-Management Tools

All responsible gaming tools are available directly through the player's account and can be activated online at any time. These tools are automatic and available free of charge, 24/7.

a) Deposit and Time Limits

Players may set personal responsible gaming limits, including deposit limits, loss limits, wagering limits, and session duration limits. Limits may be set on a daily, weekly, or monthly basis. Any reduction of an active limit takes effect immediately. Requests to increase deposit limits are subject to a mandatory seven-day waiting period before implementation. During this period, the player may cancel the request at any time. The Company may refuse or delay the increase where the player's behaviour indicates actual or potential gambling-related harm.

The Company will provide notifications when a player approaches an active limit. Players may also enable session time reminders to receive notifications regarding the duration of their gaming activity and encourage regular breaks.

Where a responsible gaming restriction, limit, or exclusion affects an ongoing activity, such measures will apply immediately to future gambling activity. However, existing bets or games that have already been placed or started may be completed in accordance with the applicable rules. No new wagers or gaming activities will be permitted until the restriction has been lifted or the existing activity has concluded.

b) Time-Out (cooling-off). Players may use the Time-Out function to take a temporary break from gambling activities. During the selected Time-Out period, the player will not be able to place bets, make deposits, or receive promotional offers. Time-Out periods are available for 24 hours, 7 days, 1 month, or 3 months. The selected restriction will remain active until the end of the chosen period, after which access will be automatically restored.

The Time-Out option is intended to help players take a short break, regain control of their gambling activity, and reflect on their gaming behavior.

c) Self – Exclusion. Players who wish to take a long-term break from gambling may activate the Self-Exclusion option. Self-Exclusion results in the complete restriction of the player's account and prevents access to the Company's gambling services, including placing wagers, making deposits, and receiving promotional communications.

Self-Exclusion periods are available for 1 year, 3 years, 5 years, 10 years, or permanently. Activation is immediate and cannot be cancelled, suspended, or reversed during the selected exclusion period.

Upon expiry of a temporary Self-Exclusion period, the player's account will not be automatically reactivated. Players wishing to resume gambling must submit a written request and complete the Company's responsible gaming assessment process before access may be restored.

Permanent Self-Exclusion is irreversible and cannot be cancelled under any circumstances. The Company shall maintain records of all self-excluded players in a dedicated Self-Exclusion Register or equivalent internal register for a minimum period of seven years from the end of the exclusion period. Known payment methods and relevant identifiers used by a self-excluded player shall be blocked or monitored during the exclusion period to prevent circumvention.

11. Difference Between Time-Out and Self-Exclusion

Criteria	Time-Out	Self-Exclusion
Wagering Prohibited	Based on player' choice: all or selected gaming activity	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	A player may select to use the tool for the current brand or all operator's brand	All brands/domains under the operator's license are covered
Duration	24 hours, 7 days, 1 month, or 3 months	1 year, 3 years, 5 years, 10 years, or permanently
Changes	Can be made more restrictive	No
Antepost bets	Remain	Refunded/Cancelled
Active poker tournaments	Must be completed	Must be completed
Marketing messages	Based on player's preferences	None. All the marketing messages are blocked
Tool Activation	Self-executed by player	Self-executed by player. Upon activation of full self-exclusion, any remaining balance shall be refunded to the original payment method within two business days, except where funds are frozen or subject to review under the Company's AML, sanctions, fraud prevention or other legal obligations.
Reactivation	Automatic	Player initiated

12. What Happens During Blocking

During Self-Exclusion, all marketing communications, promotions and offers are disabled. During a Time-Out period, the player shall be given the option to opt out of marketing communications for the duration of the Time-Out period. The player will not receive any emails, messages, bonuses, or other invitations.

The Company also blocks attempts to re-register from the same IP address or device. These restrictions apply automatically and without exception.

13 Responsible Gaming Advertising

13.1 The Company is committed to ensuring that all advertising and marketing activities are conducted in a responsible, transparent, and compliant manner. The Company shall not engage in any advertising practices that may encourage irresponsible gambling or cause harm to vulnerable persons.

13.2 The Company shall ensure that all marketing materials:

- do not target vulnerable persons or encourage gambling among individuals who may be at risk of gambling-related harm;
- do not present gambling as a means of achieving financial success, solving financial difficulties, or generating income;
- do not misrepresent games of chance or suggest that skill can influence outcomes that are determined by chance;
- do not use emotional or psychological pressure or portray gambling as a solution to personal, financial, or emotional problems;
- do not include or appeal to minors or depict minors participating in or being associated with gambling activities;
- do not contain explicit sexual content, inappropriate imagery, or suggestions of a sexual nature;
- do not associate gambling with harmful behaviors, including smoking, drug use, excessive alcohol consumption, increased attractiveness, or social status
- shall include a clear and visible responsible gaming message or slogan to promote awareness of responsible gambling practices;
- all bonuses, promotions, and special offers are communicated in a clear and transparent manner. Applicable terms and conditions, including any wagering requirements, eligibility criteria, and restrictions, shall be clearly disclosed. Bonuses and promotional activities shall not be designed or presented in a way that encourages excessive or irresponsible gambling behavior.

13.3. Third-Party Marketing Wording. The Company remains shall ensure that all marketing materials and communications created or distributed by third parties, including affiliates, representatives, sponsors, ambassadors, and social media influencers, comply with the Company's Responsible Gaming standards. All contracted third parties involved in marketing activities shall be informed of the Company's Responsible Gaming Policy and required to comply with applicable responsible advertising requirements. Any breach of the Company's responsible advertising requirements by a third party may result in removal of the relevant material, suspension of the campaign, withholding of approval, termination of cooperation, or other contractual and compliance measures.

13.4. The Company remains responsible for marketing materials and communications created, approved, used or distributed by third parties acting on its behalf, including affiliates, representatives, sponsors, ambassadors and social media influencers.

14. How to Know It's Time to Stop

We encourage players to regularly reflect on their gambling habits to ensure that gambling remains a safe and enjoyable form of entertainment and does not negatively affect their

personal, financial, or social well-being. If you are unsure whether your gambling behavior remains under control, please consider the following questions and answer them honestly. If you answer “yes” to several of these questions, it may indicate that you should take a break, review your gambling activity, or seek professional support. encourage you to keep an eye on your gaming habits to make sure it’s still fun and not causing any issues.

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

If you recognize yourself in several of these, we recommend taking a break, using our control tools, or seeking support. You are not alone.

15. Where to Find Help

There are trustworthy organizations that offer free, confidential support for gambling-related issues. You can visit their websites, take self-assessments, talk to professionals, or join support groups.

BeGambleAware — www.begambleaware.org

GamCare — www.gamcare.org.uk

Gamblers Anonymous — www.gamblersanonymous.org.uk

Gambling Therapy — www.gamblingtherapy.org

Responsible Gambling Council — www.responsiblegambling.org

National Council on Problem Gambling — www.ncpgambling.org

GamTalk — www.gamtalk.org

Gordon Moody — www.gordonmoody.org.uk

Keep It Fun — www.keepitfun.rank.com

These resources are available around the clock and without judgment.

16. Protecting Minors

Our website is strictly for adults aged 18 and over. We verify age at registration, during document checks, and for all payment operations. If we detect an underage account, it will be closed immediately, any funds will be returned, and winnings voided.

If you share your device with children, we recommend installing parental control software:

Net Nanny — www.netnanny.com

GamBlock — www.gamblock.com

CyberSitter — www.cybersitter.com

The Company takes all attempts to bypass restrictions seriously. Repeated or fraudulent activity will be reported and may lead to permanent bans.

17. Complaints and Escalation

If you believe your rights have been violated or responsible gaming procedures were mishandled, you may submit a complaint through your account or via email. We commit to reviewing it promptly and will respond in writing.

We believe that some complaints—especially those involving sensitive issues or requiring careful judgment—should always be handled by qualified people, not by artificial intelligence (AI) or automated systems. While we may use AI tools to assist with general customer support queries, we do not use AI to handle responsible gaming complaints. If your concern relates to responsible gambling (for example, issues with self-exclusion or worries about problem gambling), a trained representative will personally review your case from start to finish. A trained Responsible Gaming professional contacts the player to discuss the identified behaviour and to provide information on available Responsible Gaming tools.

Responsible Gaming complaints are reviewed by trained personnel and are not finally determined solely by automated systems

If you disagree with our decision, you have the right to escalate the matter to an independent Alternative Dispute Resolution (ADR) provider. This is free of charge and protects your interests. For full details, please visit our Complaints Policy.

You may also contact the Curaçao Gaming Authority (CGA) if you believe we've breached regulations. While CGA does not resolve individual disputes, they monitor operator conduct and investigate violations.

18. Player Support and Contact

Players may contact the Company's support team regarding responsible gaming matters, account-related questions, or any concerns through live chat and email en_support@magic365.email.

The Company will provide timely assistance and ensure that responsible gaming-related inquiries are handled appropriately by trained personnel. Where the matter indicates actual or potential gambling-related harm, the case shall be escalated to the Compliance Officer for review. The Company shall maintain complete records of all Responsible Gaming communications and interventions, including the date and time of contact, the nature of the identified concern, actions taken, communications provided to the player, and any decisions regarding escalation or further review. Where appropriate, the Company may provide players with information regarding available Responsible Gaming tools and support measures, including deposit limits, wagering or time limits, cooling-off periods, self-exclusion options, self-assessment tools, and access to external support organizations.

19. Governance and Reporting

Compliance Officer is responsible for the implementation and enforcement of this policy. Management shall receive a Responsible Gaming effectiveness report at least once every 12 months. The report shall include an assessment of the measures implemented, monitoring

activities performed, identified risks, complaints received, and any recommendations for improvement.

20. Reviewing

The Company shall maintain this Policy as part of its responsible gaming compliance framework and shall ensure that Responsible Gaming tools are made available to players through the relevant account, website or support channels. The Company shall periodically review the effectiveness of the measures described in this Policy and update the Policy where required by applicable law, CGA guidance, operational changes or identified risk. Any material amendments to this Policy shall be reported to the Curaçao Gaming Authority (CGA) without undue delay, where required.

Responsible gambling is your choice. We give you the tools. Use them.

All features are available with one click from your personal account in the Responsible Gaming section.

This Policy has been updated to the v. 3.1, effective as of July 6, 2026

Signature: _____

Title: MLRO

Name: Maksym Uhnivenko

