

Orakum N.V. (141651)

Abraham Mendez Chumaceiro Boulevard 03, Curaçao.

Responsible Gaming Policy

March 2025

Approved by the Board of Directors

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Glossary

1. **Account Suspension** – A temporary restriction placed on a player's account, preventing access to gambling activities and transactions.
2. **Affiliate Marketing** – A form of advertising where third-party partners promote an operator's gambling services in exchange for commissions.
3. **Anti-Money Laundering (AML)** – Regulatory measures designed to prevent financial crimes such as money laundering and fraud within the gaming industry.
4. **Betting Limits** – Predefined restrictions on the amount a player can wager over a specific period to promote responsible gaming.
5. **Compliance Officer** – A designated individual responsible for ensuring adherence to legal and regulatory gaming requirements.
6. **Cooling-Off Period** – A short-term gambling restriction (e.g., 24 hours, 7 days, or 1 month) that allows players to take a voluntary break from gaming without permanent account closure.
7. **Deposit Limits** – A responsible gaming feature that enables players to set daily, weekly, or monthly caps on the amount they can deposit into their gaming accounts.
8. **Exclusion Register** – A database of players who have opted for self-exclusion, ensuring they are prevented from accessing gambling services for a specified duration.
9. **Fraud Prevention Measures** – Security protocols used to detect and prevent unauthorized activities, such as multiple account registrations or identity fraud.
10. **Gaming Control Board (GCB)** – The regulatory authority overseeing gaming operations and ensuring compliance with gambling laws in Curaçao.
11. **Know Your Customer (KYC)** – A mandatory verification process requiring players to provide identification documents to confirm their identity and prevent fraudulent activities.
12. **Marketing and Advertising Restrictions** – Guidelines that prohibit the promotion of gambling services to minors, problem gamblers, or vulnerable groups.
13. **National Self-Exclusion Scheme** – A government-regulated program that allows players to self-exclude from multiple gambling operators simultaneously.
14. **Player Risk Profile** – A classification system that assesses a player's gambling behavior to determine their risk level and implement appropriate safeguards.
15. **Problem Gambling** – A condition in which gambling behavior negatively affects a player's personal, financial, or social well-being.
16. **Reality Check Alerts** – Periodic notifications that inform players about the duration of their gaming session, total wagers, and current wins or losses.

17. **Responsible Gaming Officer (RGO)** – A designated staff member responsible for implementing and monitoring responsible gambling policies within the company.
18. **Self-Assessment Tools** – Online quizzes or surveys that help players identify potential gambling problems and evaluate their gaming habits.
19. **Self-Exclusion** – A voluntary action taken by a player to temporarily or permanently restrict access to gambling services.
20. **Session Monitoring** – A feature that tracks a player's gaming duration, providing real-time updates to encourage responsible play.
21. **Thresholds** – Predefined financial or behavioral limits set by the operator to detect and address excessive gambling activity.
22. **Transaction Blocking** – A security feature that prevents deposits, withdrawals, or wagers from being processed for self-excluded players.
23. **Vulnerable Groups** – Individuals at higher risk of problem gambling, including minors, individuals with gambling addictions, and those with financial or mental health concerns.

1. Introduction

Orakum N.V (hereafter referred to as "Orakum", "Company", "we", or "our") is a Curaçao-based company operating in the online gambling industry. It holds a valid Certificate of Operation and has an application (OGL/2024/586/0786) for a gaming license in progress with the Curaçao Gaming Authority. Orakum N.V. is acting under the registration No. 141651 with its registered address at Abraham Mendez Chumaceiro Boulevard 03, Curaçao).

The company, in adherence to the Curaçao Gaming Control Board's (GCB) regulatory framework, has established a Responsible Gaming Policy designed to align with industry best practices and cater to the specific needs of its target markets. This policy incorporates measures aimed at preventing problem gambling, safeguarding vulnerable players, and promoting responsible gaming behavior across its platforms. By implementing these initiatives, the company ensures a safe and ethical gaming environment while maintaining compliance with regulatory requirements.

The company integrates Responsible Gaming principles into its operations with the goal of fostering a safe and controlled gaming environment. These efforts focus on the following key areas:

- Promoting responsible gaming experiences for all players.
- Preventing underage gambling and ensuring strict compliance with age restrictions.
- Providing tools and resources to help players manage their gambling behavior.
- Supporting initiatives aimed at addressing problem gambling and promoting player well-being.

As a licensed and responsible gaming operator, the company is committed to ensuring that gambling remains a form of entertainment. A range of company policies and tools have been implemented to prevent compulsive gambling and restrict access to minors.

The primary objective is to create a secure, supportive, and enjoyable gaming experience, where players can engage in gambling responsibly, in line with ethical standards and industry regulations.

2. Player Information

The company is committed to ensuring that players have access to clear, transparent, and accessible information to make informed decisions about their gaming activities. In compliance with the regulatory requirements set by the Curaçao Gaming Control Board (GCB), comprehensive Responsible Gaming measures are integrated throughout the website and application interface.

The Responsible Gaming Policy is prominently displayed on the homepage and easily accessible from all relevant sections of the platform. To ensure clarity for all players, the policy

is available in English and other languages relevant to target markets, allowing users to fully understand their rights and the available responsible gaming resources.

To help players manage their gaming behavior, the company provides direct access to various player protection tools.

3. Age Verification

To prevent underage gambling, a strict age verification process is enforced:

- Players must confirm they are 18 or older before depositing or playing.
- Verification includes 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) are required 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.

To prevent underage access, the Company encourages adults to safeguard usernames, passwords, and payment details. The Company also recommends third-party parental control software such as:

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

4. Self-Assessment Tools

Players can access their betting history and transaction records to assess their gambling behavior, allowing them to track their spending habits, monitor frequency, and identify any emerging patterns that may indicate problematic gambling. This transparency empowers users to make informed decisions about their gaming activity.

The Company encourages all users to seek further support if needed.

5. Behaviour Tracking & Intervention

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, cooling-off, 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.

5.1 Key monitoring factors

- **Multiple Payment Methods:** Observing the use of various payment options, especially if it seems aimed at bypassing limits.
- **Deposit and Wagering Frequency:** Noticing sudden increases or irregular patterns in deposits, wagers, or gaming sessions
- **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.
- **Attempts to Open Multiple Accounts:** Identifying efforts to create multiple accounts to circumvent deposit limits
- **Reversing Withdrawals:** Identifying players who frequently cancel withdrawal requests.
- **Young Players Spending Substantial Amounts:** Paying attention to players under 25 years old who spend significantly, particularly on casino or virtual games.
- **Unrealistic Spending Patterns:** Detecting spending behaviours that don't align with the player's demographic profile.
- **Maxing Out Credit Cards:** Noting players who exhaust their credit limits and attempt to register additional cards.

5.2 Procedures for Player Identification

The Company follows a structured approach to identifying and addressing problem gambling behavior, ensuring a safe and responsible gaming environment.

Risk Assessment of Player Profiles

- Developing player profiles with relevant data to assess individual risk levels.
- Continuously monitoring behavioral risk factors with real-time alerts for any concerning activity.

Direct Player Interaction

- Engaging with players who exhibit signs of problem gambling through trained responsible gaming professionals.
- Documenting all interactions, risk indicators, and actions taken within the Player Account Management system for transparency and follow-up.

Responsible Gaming Interventions

- Informing at-risk players about responsible gambling tools such as deposit limits, cooling-off, and self-exclusion options.
- Adhering to clear escalation protocols, which may include applying deposit limits, temporarily restricting account access for further assessment, or permanently excluding players deemed at extreme risk.

6. 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, cooling-off, 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.

Training is conducted at least annually and more frequently if necessary. 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.

7. Escalation Process

When signs of problematic gambling behavior are detected, the case is promptly escalated to the **Compliance Officer** or **Responsible Gaming Officer** for further evaluation. These officers conduct a thorough assessment to determine the most suitable intervention strategies, which may include:

- A. **Facilitating Self-Exclusion** – Assisting players who choose to voluntarily exclude themselves from gambling for a specified period, providing guidance and support to reinforce responsible gaming practices.
- B. **Imposing Additional Restrictions** – Introducing stricter deposit or wagering limits, adjusting session time constraints, or restricting access to specific gambling products to help individuals regain control over their gaming behavior.

- C. **Providing Support Resources** – Offering information on professional support services, including helplines, counseling programs, and treatment options, to help individuals address gambling-related concerns.
- D. **Enforcing Mandatory Exclusion** – When voluntary measures prove insufficient, mandatory exclusion may be implemented to protect individuals from further harm by restricting access to gambling activities.
- E. **Ongoing Monitoring and Follow-Up** – Establishing continuous monitoring procedures to assess the effectiveness of interventions and ensuring that players receive additional support when necessary.

8. Cooling-Off Period Policy

As a responsible gaming operator, the Company are committed to ensuring that the cooling-off period is **easily accessible, immediately enforceable, and free from interference**. If technical adjustments are necessary to implement this feature, the Company will manually process requests until a fully integrated solution is available.

8.1 Availability and Accessibility

Players can initiate a **cooling-off period of 24 hours, 7 days, 1 month, or 3 months** across all product verticals on our platform. During this time, they will be temporarily restricted from engaging in any gambling activities.

- The cooling-off option is **clearly displayed on our website** and can be activated with a **single-click button**, eliminating the need for email requests or operator approval.

Immediate Activation and Restrictions

Once a player selects the cooling-off option, the following measures take effect instantly to promote responsible gaming:

- **Clear Information on Options** – Players receive guidance on the difference between a cooling-off period and self-exclusion, enabling them to choose the most suitable restriction.
- **Instant Enforcement** – The selected restriction is applied immediately, ensuring swift compliance with the player's decision.
- **Temporary Account Suspension** – The player's account is locked for the duration of the cooling-off period, preventing access to gambling activities.
- **Marketing Opt-Out** – Players have the option to opt out of marketing communications throughout their cooling-off period.

8.2 Ethical Implementation: No Interference Policy

To uphold ethical standards, the Company strictly prohibits any actions that may discourage players from initiating a cooling-off period. This includes:

- **Respecting Player Decisions** – No questioning or attempts to dissuade the player from activating the cooling-off period.
- **No Delays or Reassurances** – Players will not be encouraged to reconsider or postpone their decision.
- **No Incentives to Continue Gambling** – Bonuses, promotions, or any incentives will not be offered to influence the player's choice.

8.3 Reactivation and Cooling-off Options

At the end of the cooling-off period, the following processes ensure a smooth transition:

- **Automatic Account Reactivation** – The player's account is reactivated without requiring further action.
- **Additional Restriction Options** – Players are informed about further time-out options or self-exclusion programs should they require extended or permanent restrictions.

These measures reinforce our commitment to responsible gambling, ensuring that players remain in control of their gaming activities while having access to the necessary support.

9. Self-Exclusion

The Company 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:** the Company maintains a dedicated Self-Exclusion Register, recording details of self-excluded players. These records are retained for a minimum of seven 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:** The Company provides 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, the company aims to create a safer gambling environment and support individuals in maintaining control over their gambling activities.

9.1 Self-Exclusion Process and Requirements

To ensure that self-exclusion is easily accessible and transparent, the Company provides 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.

9.2 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.

9.3 Long-Term Self-Exclusion Options

In full compliance with regulatory requirements, the Company provides a range of long-term self-exclusion options, ensuring players can make a firm and informed decision about their gambling activity.

- **Duration Options** – Players can choose from 1 year, 3 years, 5 years, 10 years, or lifetime self-exclusion, based on their needs.
- **Immediate Enforcement** – Self-exclusion requests are processed and applied instantly, without delays.
- **Strict Ethical Standards** – The Company upholds a responsible gaming approach by prohibiting any interference with a player's decision to self-exclude. This includes:
 - Respecting the player's choice without questioning it.
 - Refraining from offering incentives, bonuses, or promotions.
 - Avoiding reassurances or encouragement to reconsider.
 - Ensuring the process is not delayed or obstructed in any way.
- **Irreversible Commitment** – Once self-exclusion is activated, it cannot be reversed or shortened until the selected period expires.
- **Customizable Exclusion** – Players have the flexibility to self-exclude from specific product verticals (e.g., casino, sportsbook, poker) or apply restrictions across all gambling activities on our platform.

10. Financial and Account Management

When a player opts for full self-exclusion across all gambling verticals, the following measures take effect immediately:

- **Transaction Blocking** – All gambling-related transactions are suspended to prevent further deposits or wagers.
- **Account Suspension** – The player's account is deactivated, restricting any further access.
- **Fund Reconciliation** – Any remaining withdrawable funds (excluding those subject to Anti-Money Laundering (AML) regulations) will be refunded to the original payment method within two business days.
- **Marketing Opt-Out** – The player is permanently unsubscribed from all promotional and marketing communications.

For self-exclusion from specific gambling verticals:

- **Targeted Restrictions** – The player's access is restricted **only** to the excluded products, while permitted gaming activities remain available.

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.

10.1 Reactivation and Post-Exclusion Protocol

- **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.

11. 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.

11.1 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.

11.2 Initiated Exclusion

In certain circumstances, the Company 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.

12. Thresholds

Company offers 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.

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

13. Session Monitoring Alerts

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: A continuously displayed timer tracks the duration of each gaming session, allowing players to remain aware of the time spent on the platform.

By integrating these tools, the Company aims to foster safer gaming habits and empower players to maintain better control over their gambling behavior.

14. Promotions

The Company adheres 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:

- 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.

14.1 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.



Serhii Yelovatskyi

Director of Orakum N.V. (141651)