

Responsible Gambling Policy

Version 2.1.

XZ Solutions B.V.

Adopted on: 08.02.2025



1. INTRODUCTION AND COMMITMENT STATEMENT

XZ Solutions B.V. (“the Company”) recognizes that while gambling is a form of entertainment enjoyed by many, it also carries inherent risks that can lead to adverse personal, financial, and social consequences. As a licensee under the Curaçao framework for online games of chance, and in line with the National Ordinance on Games of Chance (Landsverordening op de kansspelen, hereinafter referred to as the “LOK”), the Company is unequivocally committed to the promotion and implementation of robust responsible gambling measures.

This Responsible Gambling Policy (“the Policy”) establishes the standards, practices, and obligations that the Company adopts to mitigate gambling-related harm, support player welfare, and ensure compliance with applicable laws and best practices in responsible gaming. It shall serve as a guiding framework for the Company’s internal operations, external communications, and regulatory engagements.

2. PURPOSE AND OBJECTIVES OF THE POLICY

The primary purpose of this Policy is to articulate and enforce the Company’s dedication to preventing problem gambling and protecting vulnerable individuals, particularly minors and at-risk adults. The specific objectives of this Policy are as follows:

- To foster a secure and supportive gambling environment;
- To provide players with transparent information and control mechanisms;
- To enforce measures to prevent underage and compulsive gambling;
- To integrate responsible gambling into all facets of the Company’s product design, customer service, and marketing;
- To train and equip employees to identify and respond to gambling-related harm;
- To collaborate with relevant treatment and support organizations;
- To ensure strict compliance with the LOK, Curaçao licensing requirements, and international standards.

3. LEGAL AND REGULATORY CONTEXT

This Policy has been developed in accordance with:

- The **National Ordinance on Games of Chance (LOK)**;
 - Guidelines issued or to be issued by any designated regulatory body in Curaçao, including the Gaming Control Board (GCB) and potential supervisory authorities under the future centralized framework;
 - International standards and frameworks, including those issued by the European Committee for Standardization (CEN), the European Gaming and Betting Association (EGBA), and the International Betting Integrity Association (IBIA);
 - Applicable data protection and consumer protection laws.
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4. PRINCIPLES OF RESPONSIBLE GAMBLING

The Company's approach to responsible gambling is built upon the following core principles:

a. Informed Player Choice

Players must have access to complete and comprehensible information regarding the risks of gambling, the nature of the games offered, and the support tools available to them.

b. Protection of Vulnerable Groups

Specific measures are taken to shield individuals at heightened risk of gambling harm, including mechanisms to identify, intervene, and refer at-risk players to support resources.

c. Preventing Underage Gambling

The Company employs rigorous age verification and Know Your Customer (KYC) procedures to ensure that only individuals who are legally permitted to gamble (18 years or older) can access its services.

d. Empowerment through Control Tools

The platform provides players with an array of self-regulation tools to manage their gambling activity responsibly and effectively. (including, but not limited to: Cooling-off periods, Self-exclusion, Deposit limits).

e. Employee Competence

All employees and contractors involved in customer interaction, product development, or regulatory functions are provided with targeted training in responsible gambling principles and practical intervention methods.

f. Corporate and Social Responsibility

The Company acknowledges its broader duty to the community and is committed to working with stakeholders to combat problem gambling and promote a safe digital environment.

5. PREVENTION OF UNDERAGE GAMBLING

Underage gambling is strictly prohibited. The following measures are enforced to detect and prevent access by minors:

- Mandatory identity and age verification during account registration;
- Use of reputable third-party KYC service providers for automated and manual verification;
- Random and risk-based re-verification for flagged accounts;
- Account suspension or permanent closure in cases of non-compliance;
- Immediate withdrawal block and refund of deposits in the event of confirmed underage gambling;
- Prominent "18+" and "No Underage Gambling" warnings across all communication channels.



6. PLAYER SELF-MANAGEMENT TOOLS AND RESTRICTIONS

To assist players in managing their gambling activities responsibly, the Company offers the following tools, which may be accessed via the player account interface or through customer support:

a. Deposit Limits

Players may set limits on the amount of funds they can deposit over daily, weekly, or monthly periods. Any request to increase such limits will be subject to a mandatory 24-hour cooling-off period.

Players can set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).

- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.
- If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.
- Any resolved or unresolved wagers made prior to the deposit limit being set in place remains unaffected regardless of the limits set.

b. Loss and Wagering Limits

Players may opt to restrict the maximum amount they are allowed to lose or wager within a given time frame.

c. Session Time Limits

A time restriction may be set to control the maximum duration of continuous gameplay.

d. Reality Check Notifications

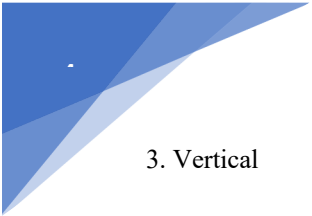
Periodic on-screen notifications inform players of elapsed time and current financial performance (total wagers, wins/losses) during a session.

e. Cooling-Off Periods (Time-Outs)

Players may temporarily suspend their access to gambling activities for a defined period ranging from 24 hours to 3 months.

Company offers players the option to activate a cooling-off period, during which they are temporarily restricted from gambling activity. The options regard:

1. Duration
2. Brand: (includes both the primary and any mirror domains of that brand)



3. Vertical

4. Marketing Opt-Out

The Duration and Marketing Opt-Out categories are mandatory. Inclusion of the Brand and Vertical categories may differ for every product of the company.

o Duration Only: Restriction on all wagering activity for the period selected on the brand where the restriction was initiated.

o Duration, Vertical and Brand: Restrictions as selected, on brands selected, on verticals selected.

The player must select (by tick-box) their preference in each of these categories. Tick-boxes must not be pre-checked.

Duration Options

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

Vertical Options

- ALL gambling activity
- Restriction on individual product verticals offered by the operator (for example Casino, Fixed Odds Betting, Poker and other P2P games). Casino may be sub-categorised as All Games or Slots Only.

Brand Options

- The current brand (website and/or app)
- All of the operator's brand

Marketing

- Opt-out.

Actions and Implementation

Timing

The restrictions must take effect immediately and be enforced according to the player's selections.

The Company must not:

- Question the player's decision.

- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The Company may incorporate a verification check for the elected periods of 1 or 3 months for the player to confirm the decision to take a break from gambling during the selected cool-off period, but such checks should be online only and neutrally expressed e.g. “You wish to cool off for one month. Please confirm”.

Player Account

- Player funds remain accessible for withdrawal.
- Account remains active but with gambling features disabled.

Marketing and Communications

- Marketing materials must not be sent to players during their Cooling Off period if they have opted out.
- No bonuses, free play, or incentives may be offered during the cooling-off period.

Reactivation and Post-Cooling Off Protocol

- Accounts must be automatically reactivated after the selected Cooling Off period expires.
- No further action is required by the player.

f. Self-Exclusion

Players may voluntarily request to be excluded from gambling activities for a period of one year or longer period of time. During this period:

- Account access will be restricted;
- All marketing and promotional communications will cease;
- The self-exclusion may not be revoked until the expiry of the minimum selected term.

The Company must offer players the option to self-exclude from all gambling activity:

1. **Duration:** In accordance with LOK clause 5.4(2) operators must offer a long-term self-exclusion periods of at least 1 year.
2. **Brand:** All brands/domains operated under the operator’s license.
3. **Vertical:** All gambling activity
4. **Marketing:** Automatic opt-out

The player must select (by tick-box) their preference as to the duration of the self-exclusion period, all the other elements are automatic.

With regard to the self-exclusion process(s) offered by the Company, at the very least the player must be able to initiate and complete the self-exclusion process fully online, without requiring email communication or Company’s approval.

Duration Options

- 1 year
- 3 years
- 5 years
- 10 years

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- Lifetime.

Actions and Implementation

Timing

The restrictions take effect immediately and be enforced according to the player's selections.

The Company must not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The Customer Care Department may implement one simple verification check to ensure that the player is aware they have chosen to self-exclude and understands the consequences of this decision. The verification should be conducted online, and be brief and straightforward. The wording should be neutral, for example: "You have chosen to self-exclude for 5 years. Please confirm".

Player Account

- Account is closed. Player can no longer log-in.
- Company should identify where reasonably possible duplicate accounts exist and prevent self-excluded individuals from creating new accounts under different credentials.
- The civil law implications must be considered. These may include that any ante-post bets must be voided and refunded, subject to AML/CFT regulations.
- The player must complete any tournaments (for example poker tournament) that is in-running at the time of the self-exclusion.
- Contributions to progressive jackpots that were made by the player through gameplay prior to the self-exclusion request remain in-situ, but the player is no longer entitled to participate with the jackpot after the self-exclusion is in effect.

Marketing and Communications

- No direct marketing or advertising can be sent to the player.

Reactivation and Post-Cooling Off Protocol

- After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account. The written request can be prompted at the point of the player attempting to log in after the exclusion period has ended or by unprompted written communication by the player via the official customer support channels. Reactivation cannot be instigated by the operator re-commencing communications with the player. Activation of a self-exclusion by a player is irreversible and irrevocable for the duration of the exclusion period selected.

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- The operator must retain records of self-excluded in accordance with the applicable retention periods. Additionally, where possible, and in line with surrounding regulations, any payment method known directly by the operator used by a self-excluded player must be blocked for future use during any exclusion period to prevent circumvention of restrictions.

Operator-Initiated Exclusion

The Company may exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour.
- The player attempts or engages in criminal activities through the operator's platform.
- Operators may not exclude players solely on the basis of the amount of their winnings.

Operator-initiated exclusions must be formally documented, and records must be kept for at least five years.

7. IDENTIFICATION AND MANAGEMENT OF PROBLEM GAMBLING BEHAVIOR

The Company utilizes a combination of automated behavioral analytics and human oversight to detect signs of potential gambling harm, including but not limited to:

- Repeated or escalating deposit behavior;
- Extended periods of continuous play without breaks;
- Requests to override established limits;
- Financial distress signals or expressions of loss-related anxiety in communication;
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period;
- Complaints or disputes that indicate problematic use patterns.

Upon identification of risk indicators, the following steps may be taken:

- Proactive contact by trained customer support staff;
- Provision of educational material and referral to support services;
- Imposition of additional limits or time-outs;
- Initiation of self-exclusion procedures where appropriate;
- Escalation to Compliance for review and possible account suspension.

Players should be encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits by providing self-assessment tools that allow them to answer a series of questions designed to help identify potential problem gambling behaviours. These tools empower players to make informed decisions about their gambling activity.

8. TRAINING AND STAFF RESPONSIBILITIES



All relevant personnel shall undergo the following mandatory training:

- **Induction Training:** An introduction to responsible gambling principles, tools, and policies.
- **Role-Specific Modules:** Focused sessions for compliance, customer service, risk, and marketing teams.
- **Ongoing Education:** Annual refreshers, updates on best practices, and training on new tools or legal developments.

Training records are retained and reviewed periodically by the Responsible Gambling Officer and Compliance Department.

9. MARKETING AND ADVERTISING CONTROLS

Marketing and promotional activities must:

- Be factually accurate and never mislead or exploit;
- Avoid targeting individuals under 18 or vulnerable populations;
- Refrain from suggesting gambling as a means to financial success or emotional wellbeing (No Portrayal of Gambling as an Investment – Advertising must not promote gambling as a way to achieve financial success or solve financial difficulties, No Misrepresentation of Skill vs. Chance – Marketing must not suggest that skill can influence the outcome of games that are purely based on chance, No Emotional Manipulation – Advertising must not portray gambling as a substitute for financial, emotional, or mental well-being);
- Include responsible gambling messaging and age disclaimers;
- No Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion;
- No Encouragement of Unrelated Harmful Behaviours – There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness;
- Respect opt-out and self-exclusion lists with immediate effect.

All campaigns are reviewed by the Compliance Department prior to release.

10. RESPONSIBLE GAMBLING INFORMATION AND EXTERNAL SUPPORT

The Company maintains a clearly visible **Responsible Gambling** section on its website, which includes:

- Explanatory content about gambling addiction;
- Self-assessment tools for identifying potential issues;
- A directory of external help organizations (e.g., Gambling Therapy, Gamblers Anonymous, GamCare);
- Tutorials on how to use self-limiting tools;
- Contact information for further assistance.

11. POLICY MONITORING, REVIEW, AND CONTINUOUS IMPROVEMENT



This Policy shall be reviewed at least annually or upon material regulatory, operational, or legal changes. The review will be conducted by the Compliance Department in coordination with the Responsible Gambling Officer. Updates are logged, approved by senior management, and communicated to all relevant stakeholders.

12. RECORDKEEPING AND REPORTING OBLIGATIONS

The Company maintains accurate and auditable records concerning:

- Self-exclusion and limit-setting requests;
- Player interactions relating to responsible gambling;
- Responsible gambling training sessions;
- Reportable incidents and regulatory communications.

All data is securely stored and managed in compliance with applicable data protection regulations.

13. REGULATORY COOPERATION AND ENFORCEMENT

The Company undertakes to cooperate fully and in good faith with all regulatory authorities and to:

- Promptly comply with requests for information or documentation;
 - Provide responsible gambling reports and statistics as required;
 - Implement directives and recommendations issued by supervisory bodies;
 - Facilitate external audits or compliance reviews where applicable.
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14. CONCLUSION

XZ Solutions B.V. affirms its commitment to maintaining the highest standards of responsible gambling by embedding a culture of care, accountability, and continuous vigilance across its operations. Through this Policy, the Company seeks not only to comply with the requirements of the LOK and Curaçao regulatory expectations but to lead by example in promoting player protection and sustainable entertainment.