

Responsible Office	Compliance Officer / Responsible Gaming Officer
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Swivel B.V.
Responsible Gaming Policy
Version 1.0

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1. Definitions

“CGA”	Curaçao Gaming Authority.
The “Company”	means Swivel B.V. (company number 164460, registered address Kaya Richard J. Beaujon Z/N, Willemstad, Curaçao) which is a holder of license number OGL/2024/634/0590 from the CGA.
“Cooling Off”	A pre-determined period (hours, days, or months) set by the player during which the player may not place any wagers whatsoever.
“Games of Chance”	Any game in which one or more players, in exchange for money or monetary value, compete for prizes of monetary value, and the outcome is determined by chance alone or by a mix of chance and player skill, without significant influence by the player. Includes sports betting and poker.
“LOK”	National Ordinance of the 20th of December 2024 Containing Rules concerning Games of Chance (National Ordinance on Games of Chance) (PB 2024, no. 157).
“Marketing, Promotion and Advertising”	All resources, messages, and media that promote the Company’s domain(s), brand(s), products, or services. Includes print, media advertising, content marketing, digital marketing, and social media campaigns.
“Mandatory Requirements”	Basic elements of a Responsible Gaming policy that all operators must implement. These must reflect the operator’s target markets and player base.
“Minor”	Any person under the age of 18.
“Self-exclusion”	When a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator.
“Vulnerable Person”	Defined in Clause 1.1(h) of the LOK as a person who: 1. Is under 18 years of age; 2. Lacks control over gambling behavior and risks harm to self or others; 3. Has been banned from gambling (voluntarily or involuntarily); or 4. Has been declared bankrupt.

2. Policy Overview

The Company is committed to promoting Responsible Gaming and protecting players from gambling-related harm. This Policy outlines the tools, procedures, and obligations the Company follows to ensure a safe and supportive gaming environment, in accordance with Article 5.4 of the LOK and the CGA guidelines.

Adherence to this Responsible Gaming Policy is a mandatory requirement under the LOK. The Policy is publicly available on the Company's website and is uploaded to the CGA portal in accordance with regulatory requirements. The version published to players corresponds to the version submitted to the CGA.

In line with the CGA Responsible Gaming Policy, the Company confirms that no credit is offered to players for the purpose of wagering.

2.1. Policy Accessibility

Adherence to this Responsible Gaming Policy is mandatory under Article 5.4 of the LOK. This Policy is publicly accessible via the Responsible Gaming Section of the Company's website and the version published corresponds to the version submitted to the CGA portal.

2.2. Policy Scope

This policy applies to all registered players and to all employees, contractors, and partners involved in player-facing services and game operations. It includes preventive measures, intervention protocols, and regulatory compliance practices.

This Policy serves both as a public-facing statement of Responsible Gaming commitments and as an internal operational framework binding on all employees, contractors, and relevant third-party partners. All persons involved in player interaction, marketing, product design, payment processing, or customer monitoring must comply with the requirements set out herein.

3. Responsible Gaming Officer

A dedicated Responsible Gaming Officer, appointed by the Company, is responsible for implementing this Policy, monitoring its effectiveness, and reporting to management annually with recommendations for improvement. All material changes to this policy are reported to the CGA.

The Responsible Gaming function shall be a designated role within the Company. Unless and until a standalone Responsible Gaming Officer is appointed, the Compliance Officer (excluding AML/CFT functions) may temporarily fulfil this role. The Responsible Gaming function shall remain operationally independent from AML/CFT responsibilities to avoid conflicts of interest.

The Responsible Gaming Officer is responsible for:

- Ensuring implementation of all mandatory Responsible Gaming measures;
- Monitoring operational effectiveness of Responsible Gaming tools;
- Overseeing behaviour tracking and intervention processes;
- Ensuring staff training is conducted and documented;
- Maintaining required records for regulatory review;
- Reporting material issues or deficiencies to Senior Management without delay.

3.1. Annual Reporting and Escalation

The Responsible Gaming Officer shall submit a written Responsible Gaming Effectiveness Report to Senior Management at least once every twelve (12) months, no later than the first quarter following the end of the reporting period.

The report shall include, at minimum:

- Number of self-exclusions (by duration);
- Number of cooling-off activations;
- Number of operator-initiated exclusions;
- Number and type of Responsible Gaming interventions;
- Statistics on use of deposit limits and other RG tools;
- Summary of behavioural alerts generated and escalations performed;
- Summary of marketing suppression actions related to RG restrictions;
- Identified weaknesses and recommendations for improvement.

Senior Management shall review the report and document any required remedial actions.

4. Prevention of Underage Gambling

The Company strictly prohibits access to our platform by anyone under the age of 18.

During the account registration process:

- The player must enter their date of birth;
- The player must confirm they are over 18 via designated checkbox;
- Additional verification checks are conducted.

Government-issued identification (passport, national ID, or driver's licence) must be verified at defined AML thresholds and in all cases prior to the first withdrawal, in line with Section 5.1 of the CGA Responsible Gaming Policy

Secondary electronic or database checks may supplement but shall not replace this requirement.

If the Company becomes aware that a player is a minor:

- The account must be closed immediately;
- Deposits will be refunded in accordance with civil law obligations;
- Any winnings will be voided;
- The reason must be communicated clearly.

All age verification checks and outcomes must be retained and made available for audit and recorded for regulatory purposes for five (5) years. Customer support and compliance staff must escalate any suspicion of underage gambling immediately to the Responsible Gaming Officer.

5. Player Information and Accessibility

The Company maintains a dedicated **Responsible Gaming Section** ("RG Section"). The RG Section:

- is clearly identifiable and accessible;
- is available in English and the target market language;
- the English version prevails in case of discrepancy;
- provides direct access to self-exclusion, cooling-off, deposit limits and other tools;
- includes contact details for RG concerns.

Employees must ensure that all Responsible Gaming tools remain functional, accessible without unnecessary delay, and not subject to commercial influence.

Support Resources: The Company offer links to professional organizations and hotlines specializing in gambling addiction, such as <http://www.begambleaware.org/>, <http://www.gamcare.org.uk/>, <http://www.responsiblegambling.org/>.

Customer Support: A dedicated support team is available to assist players experiencing gambling-related issues, and the Company encourages players to reach out for help if they feel they are losing control. Additionally, you can also take a self-test if you may be addicted to gaming at: <https://www.begambleaware.org/gambling-problems/do-i-have-a-gambling-problem/>.

6. Player-Controlled Tools

Players can set daily, weekly, or monthly deposit limits to control their spending. These limits can be set during account registration or modified at any time in the account settings.

Players will be notified of their current deposit limits and receive a notification of their spending when they reach 80% of their limit to encourage responsible gaming. Requests to increase deposit limits take effect immediately, while requests to decrease limits are subject to a mandatory 24-hour waiting period. Additional limits, such as loss limits and time limits, will also be available.

The Company encourages players to utilize reality check reminders, which notify them of their playtime at regular intervals (e.g., every hour). Players can customize these reminders in their account settings.

Players can access at least six (6) months of play history, which includes information on their betting activity, deposits, and withdrawals. This transparency helps players make informed decisions about their gaming behavior.

The Company encourages players to regularly evaluate their gambling behavior through self-assessment tests, such as Gamblers Anonymous 20 Questions (<https://gamblersanonymous.org/20-questions/>) and the CAGE Questionnaire:

- **Cut Down:** Have you ever felt you ought to cut down on your gambling?
- **Annoyance:** Have people annoyed you by criticizing your gambling?
- **Guilt:** Have you ever felt bad or guilty about your gambling?
- **Eye-Opener:** Have you ever felt the need to gamble right after waking up to get back money lost the day before (acting as an "eye-opener" or to "chase" losses)?

Customer-facing teams must direct players who identify risk indicators toward Responsible Gaming tools and support resources.

7. Cooling-Off Periods

Players can activate a cooling-off period of 24 hours, 7 days, 1 month, or 3 months, during which they are temporarily restricted from gambling. This option is easily accessible through the RG Section and can be activated with a single click, without requiring email communication or Company approval. Upon activation, the player's account will be locked immediately, preventing any participation in gambling activities for the selected period.

The main features of a cooling-off are:

- The player must be informed of the difference between a cooling-off period and self-exclusion, with the opportunity to proceed directly to self-exclusion if they choose.
- The cooling-off period takes effect immediately.
- The player's account is locked, preventing any participation in gambling activities for the full period selected.
- The player is given the option to enhance their protection by opting out of the marketing database during their cooling-off period.
- Reactivation is automatic upon expiry.

The Company shall not discourage players from activating the cooling-off period by questioning their decision, offering reassurances to delay the process, or providing bonuses or promotions as incentives to continue playing. Customer support may assist only where technical issues arise and must not discourage activation.

8. Self-Exclusion

Players have the option to self-exclude from gaming activities for a specified period, with options for 1 year, 3 years, 5 years or 10 years. This feature is easily accessible and prominently displayed in the player account settings and the RG Section.

Once a self-exclusion request is submitted, the player's account will be suspended, and they will not receive any promotional materials or communications from us during the exclusion period. All known payment methods used by self-excluded players will be blocked. Self-exclusion applies to all brands and domains under the licence of the Company.

The Company implements a clearly defined and documented self-exclusion program that is easily accessible and ensures immediate action upon a player's request. This tool is designed to help individuals regain control over their gambling behavior and prevent further harm.

Reactivation may only occur upon written request by the player after expiry of the exclusion period. Reactivation cannot be initiated by the Company.

8.1. Self-Exclusion Process and Requirements

Accessibility and Communication: The self-exclusion option is prominently displayed on the website, ensuring players can easily locate and activate it. Information about self-exclusion clearly outlines the steps required, duration options available, and the benefits of self-exclusion.

Immediate and Irreversible Action: Players can initiate and complete the self-exclusion process fully online, without requiring email communication or Company approval. The process is designed to take no more than 15 minutes to complete.

Record Keeping: The Company will maintain a Self-Exclusion Register for a minimum of seven (7) years from the end of a player's exclusion period, including records of all self-excluded players and their known payment methods to prevent future use during the exclusion period.

8.2. Financial and Account Management

Upon activation of total self-exclusion from all verticals:

- All gambling-related transactions are blocked immediately.
- The player's account is deactivated, preventing further play.

- Remaining funds in the player's account must be refunded to the original payment method within two business days, subject to AML policy requirements.
- The Company must permanently remove the player's data from all marketing and promotional lists.

9. Staff Training and Awareness

All employees, particularly those in customer support and compliance roles, will undergo comprehensive training programs focusing on responsible gaming practices. Responsible Gaming training is mandatory for:

- Customer Support;
- VIP Management;
- Marketing;
- Responsible Gaming function holders.

Training will cover identifying signs of problem gambling, how to communicate with affected players, and the resources available for support. Staff will receive ongoing education on the latest developments in Responsible Gaming practices and regulations to ensure our policies remain current and effective. Training must be conducted at least annually and documented. Records must be retained for regulatory review.

To enhance our Responsible Gaming initiatives, the Company conducts regular audits of our responsible gaming measures to assess their effectiveness.

10. Monitoring and Intervention

The Company actively monitors player behavior to detect signs of problematic gambling. By analyzing deposit activity, betting patterns, session durations, and player interactions, the Company can identify at-risk individuals and take proactive steps to prevent gambling-related harm. This includes direct contact with players exhibiting concerning behavior, providing information on responsible gaming tools, and implementing interventions as necessary.

10.1. Procedures for Player Identification and Intervention

- **Player Profiling and Risk Assessment:** Establish player profiles with relevant data points to assess individual risk levels.
- **Direct Player Interaction:** When concerning behavior is identified, the Company must initiate direct contact with the player via trained responsible gaming professionals.
- **Responsible Gaming Interventions:** Players exhibiting at-risk behavior must be informed about responsible gaming tools, including deposit limits, time-outs, and self-exclusion.

11. Marketing and Advertising Compliance

The Company is responsible for ensuring that all marketing, promotional, and advertising activities adhere to responsible gaming principles. Direct marketing activities (including emails, messaging, bonuses, or incentives) are prohibited during an active cooling-off or self-exclusion period.

All advertising must include a clearly visible Responsible Gaming message or slogan.

The Company shall not engage in misleading, excessive, or irresponsible advertising, adhering to the following restrictions:

- No aggressive or misleading tactics.
- No targeting of vulnerable groups, self-excluded players, minors, or financially vulnerable individuals.
- No portrayal of gambling as an investment or solution to financial difficulties.
- No misrepresentation of skill versus chance.
- No emotional manipulation or portrayal of gambling as a means of escaping personal struggles.
- No use of child-friendly content or imagery appealing to minors.
- All promotional materials must transparently communicate terms and conditions.

The Company remains responsible for affiliates, ambassadors, influencers and third-party marketing partners. Contracts must require adherence to this Responsible Gaming Policy.

12.Compliance and Regulatory Obligations

We document all responsible gaming activities and maintain records for regulatory review. The CGA may request these records at any time to ensure compliance.

If a self-excluded individual or minor is found to have accessed gambling beyond their self-exclusion choices:

- All deposited amounts must be refunded within two business days.
- The player's account will be immediately blocked to prevent further play.
- A detailed report will be submitted to the CGA within five working days, outlining how the issue occurred and what actions are being taken to prevent recurrence.

13.Contact Information

For any inquiries related to our Responsible Gaming Policy or if you need assistance, please contact the Company's Support channels. Our Support will ensure that any information shared is kept confidential and will not be disclosed without the player's consent.