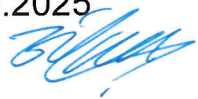


# Responsible Gaming Policy (Santora)\_V1.1

IT Management Santora B.V.

IT Management Santora B.V.  
Managing Director - Yeva Asiryan  
Date - 18.06.2025  
Signature - 

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## INFORMATION

THE ENGLISH VERSION

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## Chapter 1: General provisions

The purpose of the Responsible Gaming Policy (hereinafter referred to as the "Policy") is to promote safe, fair, and enjoyable gaming experiences while protecting players from the potential risks associated with gambling.

The Policy is implemented to ensure that IT Management Santora B.V. (hereinafter referred to as the "Company") adhere to ethical standards and actively encourage responsible behavior among players.

## Chapter 2: Definitions

The following definitions and abbreviations are used in this Policy

|                                             |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         |
|---------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>CGA</b>                                  | means Curacao Gaming Authority                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                          |
| <b>Cooling Off</b>                          | means a pre-determined period that can comprise hours, days or months which is set by the player during which time the player may not place any wagers whatsoever                                                                                                                                                                                                                                                                                                                                                                       |
| <b>Games of Chance</b>                      | means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker                                                                                                                                    |
| <b>LOK</b>                                  | is the National Ordinance on Games of Chance law of Curacao                                                                                                                                                                                                                                                                                                                                                                                                                                                                             |
| <b>Marketing, promotion and advertising</b> | refer to all resources, messages and media that promote the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns                                                                                                                                                                                                                                                                               |
| <b>Mandatory Requirements</b>               | are the basic elements of a Responsible Gaming policy that must be implemented by the Company. These elements must reflect the target markets and players of the Company: Age verification, Information accessibility, Player self-assessments, Behavior tracking, Cooling-off Periods, Self-exclusion, Deposit limits, Consumer Advertising and Marketing, Training of employees.                                                                                                                                                      |
| <b>Minor</b>                                | means any person under the age of 18                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                    |
| <b>Self-exclusion</b>                       | is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with the Company                                                                                                                                                                                                                                                                                                                                                                                                            |
| <b>Vulnerable Person</b>                    | is defined in the Clause 1.1 (h) of the LOK as <ul style="list-style-type: none"> <li>• Under eighteen years of age.</li> <li>• Has no, or insufficient, control over his or her gambling behavior, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people.</li> <li>• Has been banned from playing any Game of Chance either by force or at his or her own request.</li> <li>• Has been declared bankrupt</li> </ul> |

## Chapter 3: Introduction

3.1 The Responsible Gambling Policy of the Company outlines the principles, procedures, and comprehensive measures implemented to promote responsible gaming practices in compliance with the Curaçao Gaming Authority (CGA).

3.2 The policy applies to all users registered on the Company's platform and emphasizes the importance of fostering a responsible gambling environment.

3.3 It covers a wide range of procedures, including self-exclusion mechanisms, account restrictions, compliance reviews, reopening of accounts, and ongoing efforts related to player education and awareness.

3.4 By aligning with the CGA's guidelines, the Company ensures it contributes to the well-being of its players and upholds the integrity of the online gaming industry.

3.5 The Company acknowledges its regulatory obligations under the Curaçao Gaming Authority and is committed to maintaining a safe and responsible gambling environment for all users.

## Chapter 4: Objects of Responsible Gambling

4.1 The Company is firmly committed to fostering an environment where users can engage in gaming activities in a responsible and controlled manner. This commitment includes setting clear limits for gameplay, recognizing early signs of problematic gambling behaviour, and encouraging users to take regular breaks when necessary. The platform provides a variety of resources and support mechanisms, including detailed information on responsible gambling and self-exclusion options. The Company adheres to the CGA's Responsible Gambling Policy, ensuring the highest standards of player protection and regulatory compliance. The policy emphasizes the provision of resources and support mechanisms to assist users who may be experiencing gambling-related issues. This includes self-exclusion options, educational materials, and access to external support organizations. The Company recognizes and respects the regulations set forth by the CGA regarding responsible gambling. The platform is committed to working in tandem with regulatory bodies to ensure compliance and the highest standards of player protection.

## Chapter 5: Player Education and Awareness

5.1 The Company ensures that information about responsible gambling is prominently displayed across all sections of its platform, including the website, mobile applications, and communication channels used to interact with players. The platform will provide comprehensive educational resources that cover a variety of topics, such as recognizing the early signs of problem gambling, understanding how to set responsible gaming limits, and accessing external support services. Information about responsible gambling will include clear contact details for support organizations, such as: <https://www.gamblingtherapy.org/> or <https://www.gamblersanonymous.org/ga/>. The Company ensures that players can easily access these resources at any time, offering continuous support and education to promote safer gambling habits. This includes the website, mobile application, and any other communication channels used to interact with users.

5.2 The platform will provide comprehensive educational resources to users, covering topics such as recognizing signs of problem gambling, understanding responsible gaming limits, and accessing support services. Information about responsible gambling, including contact details for support organizations, will be prominently displayed on the website. This ensures that users can easily access help when needed.

5.3 The player is able to access a detailed record of their betting and wagering history of the last 6 months. Longer periods of transactions may be requested from the Company and must be provided within 10 working days.

## Chapter 6: Self-Exclusion Options

### 6.1 Cooling Off Periods

6.1.1 Users will have the option to initiate cooling off periods as a measure to control their gambling activities. These periods act as breaks, allowing users to step back and reassess their gaming behaviour. The players are able to choose from a duration of 24 hours up to 3 months of the cooling off period and are immediately taken into effect.

### 6.2 Definite Self-Exclusion

6.2.1 Self-Exclusion is offered, allowing players to choose from a period of 1-10 years that their account will remain closed. Once the self-exclusion period begins, the account is disabled, and the player is not able to deposit or withdraw funds for the period the self-exclusion is enabled. Upon expiration of the self-exclusion, the account shall be re-activated upon request of the player.

### 6.3 Indefinite Self-Exclusion

6.3.1 Indefinite Self-Exclusion is applied through customer support. This is so that we can ask the reason for the exclusion, to ensure the appropriate exclusion is set in case of problem gambling. A self-exclusion due to problem gambling would always be a permanent self-exclusion, which propagates across all brands.

6.3.2 Any outstanding funds will be returned to the player using the same method used for deposit. The player will be also excluded from receiving any promotional or marketing material.

(6.3.3 Any request to extend an exclusion will take effect immediately. Any request to remove a definite exclusion will only take effect after the expiration of a 24-hour cool-off period. Removing an indefinite exclusion requires a cool off period of 7 days.

6.3.4 Records of any self-exclusion will be kept for at least the self-exclusion period plus an additional six-month period.

### 6.4 Extended Exclusion Periods

6.4.1 Should users require longer breaks, they can contact customer service through chat, email, or phone to request extended exclusion periods. This additional option supports users in making more significant commitments to responsible gaming.

### 6.5 Contacting Customer Service

6.5.1 Users can easily reach out to customer service team for assistance in initiating self-exclusion or to discuss any concerns related to their gambling behaviour. The customer service team is trained to handle such requests with sensitivity and efficiency.

## Chapter 7: Limits

7.1 The Company allows players to set personalized gambling limits on their account to encourage responsible gaming.

7.2 These limits can be set for specific periods: daily, weekly, or monthly.

7.3 The financial limits available include:

- Deposit Limits: A restriction on how much a player may deposit within a selected time frame;
- Wagering Limits: A restriction on how much a player may wager over a specified period.

7.4 Any request to lower a limit will take effect immediately. Any request to raise or remove a limit will only take effect after the expiration of a 24-hour cool-off period.

## Chapter 8: Reality Checks

8.1 A Reality Check alert can be set to either 30 or 60 minutes from the player account settings. When the alert time limit is reached, it will pause play, and the player needs to confirm the message and is also given the option to end their session.

8.2 In the Reality Check message, the following information is displayed:

- The amount of time which the player has spent playing so far during the session;
- The amount of winnings or losses during the current session.

## Chapter 9: Account Restrictions and Compliance Review

9.1 The Compliance Department at The Company plays a critical role in the responsible gambling process. Upon receiving a self-exclusion request, the Compliance Department immediately restricts the player's account to prevent further gameplay and deposits. A thorough review is conducted to evaluate the player's gambling history, any interactions with customer service, and other available data to ensure compliance with CGA regulations. If the Compliance Department identifies signs of problem gambling, further action will be taken, which may include permanent account closure, refunding remaining funds, and directing the player to professional help resources.

9.2 The responsible gaming process is intended to detect, investigate, and take action on potential problem gamblers typically shall start with detection, where behavioural monitoring tools flag unusual patterns such as frequent deposits, long play sessions, chasing losses, or signs of distress in communications.

9.3 Additionally, the platform utilizes advanced monitoring tools to detect unusual gambling behaviours. These tools flag behaviours such as excessive deposits, frequent withdrawal reversals, and prolonged gaming sessions. In cases where these behaviours are detected, the Compliance Department will conduct a deeper assessment, providing support to players showing signs of gambling addiction and potentially closing the account permanently to prevent harm. The Company also makes use of indicator signs to identify and detect players with a possible gambling problem, such indicators may include:

- Deposit and wagering frequency – sudden increases or erratic deposit, wagering or gaming session patterns;
- Repeated failed transactions due to insufficient funds;
- Reversing withdrawals – players cancelling withdrawal requests multiple times;
- A pattern of Inexplicable extended play sessions
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation;
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period;
- Players maxing out a credit card;
- Attempts to open multiple accounts to bypass deposit or loss limits.

9.4 The Company will carry out an investigation, where flagged accounts are reviewed by a responsible gaming team who analyse the player's activity, cross-reference with any previous concerns, and potentially engage the player with a welfare check via email, chat or phone. The Compliance Department will keep a record of investigations carried out on a player including any decisions taken.

9.5 If the problem persists, the Company may impose limits on the player such as a set amount of time the player is allowed to play or a limit on the amount of funds the player is allowed to deposit. In cases where there are clear signs of Problem gambling behaviour, the Company has the right to exclude the player from their services. The Company shall also ensure that the Player is given the necessary support and offer the player external support such as website links and helplines related to problem gambling.

## Chapter 10: Account Reopening After Closure

10.1 Users seeking to reopen their accounts after the minimum closure period can initiate the process through the platform's designated channels. The reopening process includes communication with the customer service team and a thorough assessment of the user's readiness to resume gaming activities responsibly. The case is escalated to the Compliance Team for a thorough assessment of the account, followed by its reopening in those cases where the assessment is completed successfully.

10.2 The Company is committed to providing support to users during the reopening process. This may involve discussions with the customer service team to ensure users have taken the necessary steps to address any gambling-related issues before resuming gameplay. The user can contact The Company through the communication channels indicated on the website. Once the reopening procedure is initiated, the customer will answer a series of questions to ensure that the break taken was beneficial for him and that he assumes full responsibility for reopening the account and implicitly understands what this responsibility entails. Once this process is complete, the support team will refer the case to the compliance team for reopening.

10.3 Accounts that have been reopened will be subject to continued monitoring to identify any potential signs of recurring gambling issues. The Company remains vigilant in maintaining a safe gaming environment for all users.

## Chapter 11: Prevention and Monitoring Tools

11.1 The Company employs monitoring tools to detect unusual gambling patterns and behaviours that may indicate potential issues. These tools utilize algorithms and data analysis to identify patterns that may suggest compulsive or problematic gambling behaviour.

11.2 The platform's monitoring tools will actively identify and flag any unusual gambling patterns, such as excessive spending, frequent and prolonged gaming sessions, or irregular account activities.

11.3 This may involve reaching out to the user directly, providing information on responsible gambling practices, and encouraging the use of self-exclusion options. In the event that a support agent observes behaviour inconsistent with responsible gaming, they immediately escalate the case to the Compliance team, and the account activity may be halted immediately if serious gambling issues are detected for the user.

## Chapter 12: Support and Assistance for Users

12.1 When a player is excluded due to sufficient reasons suggesting they are suffering from gambling harm, the company will provide clear and comprehensive information outlining the reasons for the exclusion, including specific behaviours or patterns observed. The Company encourages users to seek assistance if they believe they may have a gambling problem. Responsible gambling information, including contact details for support organizations, will be readily available on the platform at <https://www.gamblingtherapy.org/> or <https://www.gamblersanonymous.org/ga/>, as well as other CGA-endorsed bodies.

12.2 The Company will collaborate with external support organizations dedicated to assisting individuals with gambling-related issues. These organizations will be accessible to users seeking additional guidance and support.

12.3 The Company recognizes the sensitivity of gambling-related issues and is committed to maintaining the confidentiality and privacy of users seeking support. All communications with support organizations and customer service are handled with the utmost discretion.

## Chapter 13: Protection of Minors

13.1 The Company considers the issue of minors taking part in games and betting very seriously and does not allow minors (persons under the age of 18) to participate in games and make bets. Confirmation of having reached the legal age and confirmation of date of birth are mandatory requirements during registration. The Company may perform background checks on any player and request any relevant documentation such as a copy of a passport or other identification documentation as part of the KYC procedures.

13.2 The basis for such investigations will be dependent on the specific case but could include (but is not limited to) verification of the player's registration details, such as the name, address and age, occupation, verification of the player's financial transactions, financial standing, source of wealth, source of funds and/or gaming activity.

13.3 If, upon completion of KYC verification checks, customer is shown to be underage:

- Company will return all deposits to customer and no winnings will be paid;
- All transactions made whilst customer were underage will be made void, and all related funds deposited will be returned by the payment method used for the deposit of such funds, wherever practicable;
- Customer account will be permanently closed; and
- Company shall communicate with the reason for account closure.

13.4 To offer the best possible protection of minors, we also request the support of parents and caregivers. It is advised on the responsible gaming page to:

- keep their data for account access in a safe place (user ID and password);
- install filter software to restrict the access to Internet resources inappropriate for children and teenagers.

13.5 The following third-party tools are examples that are available for parental control and website blocking:

- GamBlock – [www.gamblock.com](http://www.gamblock.com)
- BetBlocker – [betblocker.org](http://betblocker.org)
- Gamban – [gamban.com](http://gamban.com)

## Chapter 14: Employee Training and Awareness

14.1 All employees, particularly those in customer service and compliance roles, undergo rigorous and continuous training programs designed to enhance their understanding of responsible gambling practices.

14.2 This training includes the identification of early warning signs of problem gambling, effective communication techniques for assisting affected players, and detailed protocols for handling self-exclusion requests in compliance with CGA standards.

14.3 Additionally, The Company commits to the ongoing improvement of its Responsible Gambling Policy.

14.4 The policy will be reviewed on an annual basis, or more frequently if necessary, to ensure alignment with new regulations or emerging best practices in the online gaming industry.

14.5 The Company will promptly update its procedures to comply with any new requirements set forth by the CGA.

## Chapter 15: Continuous Improvement and Updates

15.1 The Policy will be reviewed one year from the effective date, unless the document owner submits any process changes prior to that date.

15.2 The Company is committed to conducting yearly regular reviews of its Responsible Gambling Policy. This includes assessments of the effectiveness of existing measures, identification of areas for improvement, and alignment with evolving industry best practices.

15.3 The platform remains vigilant in staying abreast with evolving regulatory requirements related to responsible gambling. Updates to the policy are made promptly to ensure continued compliance and alignment with the highest standards of player protection.

## Chapter16: Conclusion

16.1 The Company reaffirms its commitment to promoting responsible gambling practices among its global user base, in full compliance with CGA regulations. By implementing a comprehensive and dynamic Responsible Gambling Policy, the platform ensures that it provides a safe and enjoyable gaming environment for all players. Responsible gambling is a shared responsibility, and The Company is committed to working closely with players, regulatory bodies, and support organizations to contribute to a safer online gaming experience. By continuously updating and improving our practices, we aim to protect vulnerable players and uphold the highest standards of integrity and player welfare.

## Chapter 17: Policy Review

The Policy will be reviewed one year from the effective date, unless the document owner submits any process changes prior to that date.

## Chapter 18: Related laws & regulations

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