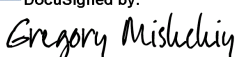




Panbet Curacao N.V.

Responsible Gambling Policy

Version	Author	Description of Changes	Date	Approved by
1.2.	Sofija Bondarenko Responsible Gaming Officer	Update of the Policy	26/03/2025	Gregory Mishchiy Director / Head of Compliance
1.3	Sofija Bondarenko Responsible Gaming Officer	Update of the Policy	20/10/2025	Gregory Mishchiy Director / Head of Compliance Signature: 

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Contents

1. Overview 3

2. Access to gambling by children and young persons 3

3. Responsible Gambling Information 4

4. Responsible Gambling Tools 5

 4.1 Deposit and Loss limits 5

 4.2 Account Closure and Self-Exclusion..... 5

 4.3 Cooling-Off..... 6

 4.4 Betting & Account History 7

 4.5 Self-Assessment Test 7

 4.6 Behaviour Tracking 8

5. Internal Rules and Procedures 9

6. Employees Training..... 9

7. Responsible Marketing & Advertising..... 10

1. Overview

This policy sets out the Panbet Curacao N.V. (hereinafter PCNV) commitments towards Responsible Gambling and the measures it has implemented to prevent, detect, and protect customers from potential harmful effects the gambling activity might have.

This Responsible Gambling Policy aligns with the Curacao Gaming Authority (CGA) regulations and includes measures to protect players, prevent gambling-related harm, and ensure compliance with regulatory requirements.

Player Protection

We take proactive steps to protect players, particularly vulnerable individuals, by:

- Implementing age verification processes to prevent underage gambling.
- Providing responsible gambling tools, including self-exclusion and cooling-off periods.
- Monitoring player behavior for signs of problem gambling.
- Offering access to educational resources and support organisations for responsible gambling.

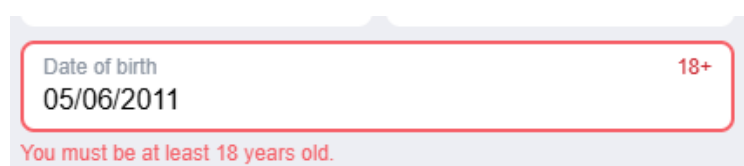
2. Access to gambling by children and young persons

PCNV developed and put into effect policies and procedures designed to prevent underage gambling and monitor the effectiveness of these procedures.

Users must be at least 18 years old to register and play. When opening an account, customers are required to provide, among other things, the following information as part of the registration process:

- (a) Full name (name, surname)
- (b) Date of birth

There is a highlight in place just in line with the date of birth field whereby the 18+ sign is emphasised. At the same time, the system has restriction in place for entering any date of birth that will be under the legal age. Below the error displayed in such instances is provided.



The image shows a user interface for a date of birth input. It consists of a light blue rounded rectangle containing a white rounded rectangle. Inside the white rectangle, the text "Date of birth" is in blue, and "05/06/2011" is in black. To the right of the date, "18+" is written in red. Below the white rectangle, the text "You must be at least 18 years old." is displayed in red.

Additionally, the age restriction sign is visible on every page of the website.

By accepting our Terms & Conditions (T&Cs), customers are confirming and indicating to us that they are 18 years of age or above and over the legal age for Internet Gambling in the jurisdiction in which they reside.

☐

I confirm that I am over 18 years of age and accept the [Terms and Conditions](#) and [Privacy Policy](#) of Panbet Curacao N.V. (Marathonbet).

The identification and verification procedures are covered during induction and standard training in Anti-Fraud department. The staff is properly trained on how to check documents and what needs to be done if they doubt the veracity or adequacy of documents or information previously obtained for the purposes of identification or verification. For instance, the documents are forged, or a customer is trying to hide their real age. Moreover, the staff knows what course of actions must be done, once they verify that the customer is under 18.

Any account found belonging to a minor will be immediately closed, deposited funds refunded (if applicable) and customer will be informed about the reason of the closure.

A clause [5.1. Minors and Advice for Family & Friends](#) of the T&Cs contains parental guidance with suggested protection software web sites.

3. Responsible Gambling Information

PCNV made information readily available to our customers on how to gamble responsibly and how to access information about and help in respect of problem gambling. This is achieved under section [5. Responsible Gambling](#) of the T&Cs on the website. The information is directed to all customers, not only to those who may be or are at risk of or are experiencing gambling related harms.

The displayed information covers the following aspects:

- [Account Closure and Self-Exclusion](#)
- [Cooling-Off](#)
- [Setting Limits](#)
- [Betting/Account History](#)
- [Staying in Control](#)
- [Minors and Advice for Family & Friends](#)
- [Getting Assistance](#)

4. Responsible Gambling Tools

PCNV developed and made available to the customers a set of measures and functionalities aimed at helping and aiding clients in considering and managing their level of gambling activity.

The information in this section will provide an overview of the available tools.

4.1 Deposit and Loss limits

PCNV has ensured customers have available means to control their level of gambling and the amount they can deposit and/or loss within a specific period of time.

Customers have the option to set daily deposit and loss limits on their accounts. This can be done by contacting our customer support team.

A Daily Deposit Limit allow customers to set the amount that they can deposit into their Marathonbet account on a daily basis.

A Weekly Deposit Limit allows customers to set the amount that they can deposit into their Marathonbet account on a weekly basis.

A Monthly Deposit Limit allows customers to set the amount that they can deposit into their Marathonbet account on a monthly basis.

A Daily Loss Limits allow customers to set the amount that they can lose on a daily basis.

Any changes in the applied deposit/loss limits will be performed only after successful completion of standard identification and verification of client.

4.2 Account Closure and Self-Exclusion

Should a customer desire to either temporarily or permanently close their Marathonbet account, they can do this by contacting our Customer Support team.

The Customer Support will always carefully consider and proceed with received request as soon as practicable, ensuring the account is closed according to customer wish.

When a request to close the gambling account is received, customer support team is required to determine the reason of closure and ensure the appropriate closure level is applied.

PCNV also ensured clients can apply Self-Exclusion on their accounts.

Self-Exclusion allows customers to define a voluntary fixed term in which they are denied access to our betting services. This period can be set for a duration of customer choice, a long-term self-exclusion options of 1, 3, 5, 10 years, or lifetime. Once a self-exclusion request is made, it takes effect immediately.

Once the account is self-excluded, the customer will not be able to log into their account. If they have a positive balance in their account, they can contact the Customer Support team to request the withdrawal of the remaining funds (subject to civil laws). . All payment methods known by the system will be blocked until the self-exclusion period ends to prevent circumvention of restrictions.

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The Self-Exclusion can be activated by customers themselves from their accounts, in the Player Protection section and select their preferred duration for the self-exclusion period. Alternatively, they may Self-Exclude by contacting our Customer Support team. As a socially responsible betting operator, we will endeavour to action the account closure/Self-Exclusion request immediately.

Once the Self-Exclusion has been applied on the account, the agreement is final and cannot be changed or reversed.

4.3 Cooling-Off

Should a customer wish to stop betting for short while with Marathonbet, they are able to take Cooling-Off period. They can do this by contacting our Customer Support team.

The Customer Support will always carefully consider and proceed with received request as soon as practicable.

Cooling-Off allows customers to define a voluntary fixed short term in which they are denied access to our betting services. This period can be set for a duration of customer choice with a minimum Cooling-Off period of 24 hours and up to 3 months.

Clients can also choose between cooling-off from individual products or apply the Cooling-Off across all products. See below for a complete list of products, to which a customer may apply the Cooling-Off:

- Sport
- Casino
- Live Casino
- Toto

Once the Cooling-Off has been applied on the account, the agreement is final and cannot be changed or reversed.

4.4 Betting & Account History

To help customers keep a track of their level of gambling activity and reflect on spendings, PCNV has ensured customers can, with ease, access and review their history of previous bets, deposits and withdrawals, along with their current balance in the betting/account history section available on their account. Customers can access this information covering at least the last six months. Longer periods of transaction history may be requested from Customer Support team and will be provided within 10 business days.

4.5 Self-Assessment Test

A list of self-test questions has been created and made available to the customers in our [Responsible Gambling](#) section, under Staying in Control paragraph.

Customers are encouraged to use this list whenever they feel necessary to assess whether they are spending too much time and/or money on gambling.

The test comprises thirteen self-assessment questions presented below:

1. Have others ever criticised your gambling?
2. Have you ever lied to cover up the amount of money or time you have gambled?
3. Do arguments, frustrations or disappointments make you want to gamble?

4. Do you gamble alone for long periods?
5. Do you stay away from work to gamble?
6. Do you gamble to escape from a boring or unhappy life?
7. Are you reluctant to spend 'gambling money' on anything else?
8. Have you lost interest in your family, friends or pastimes due to gambling?
9. After losing, do you feel you must try and win back your losses as soon as possible?
10. When you gamble and run out of money, do you feel lost and in despair, and need to gamble again as soon as possible?
11. Do you gamble until your last penny is gone?
12. Have you lied, stolen or borrowed just to get money to gamble or pay gambling debts?
13. Do you feel depressed or anxious because of your gambling?

If a customer finds himself answering "yes" to even a couple of the above questions, we are asking them to consider one of the organisations that are offering support and help as a result of betting or gaming activity. These organisations are listed in our Responsible Gambling section under "[Getting Assistance](#)" paragraph.

Additionally, we provide a link to the self-test questions that are available on the Gamblers anonymous website:

<https://gamblersanonymous.org/20-questions/>

4.6 Behaviour Tracking

Marathonbet has put into effect policies and procedures for customer interaction where we have concerns that a customer's behaviour may indicate problem gambling. The procedures include:

- a. the types of behaviour that will be logged/reported to the appropriate level of staff and which may trigger customer interaction at an appropriate moment as per PC Problem Gambling (PG) Alerts procedure.
- b. the circumstances in which consideration should be given to refusing service to customers and application of Player Protection Measure state on the account as per Player Protection Measure (PPM) procedure.
- c. induction and annual refresher customer Interaction training is provided for relevant staff that is responsible for responsible gambling customer interactions.
- d. specific procedures for interacting with customers demonstrating signs of agitation, distress, intimidation, aggression or other behaviours that may inhibit customer interaction. They are

addressed by Responsible Gambling procedure - clause 'Distress Situations' section, PC Problem Gambling (PG) Alerts procedures and Third Party Concerns procedure.

5. Internal Rules and Procedures

For the identification and ongoing monitoring of player's gambling pattern, a set of processes and procedures have been designed, implemented, and directed at detection of players who might develop or manifest a behaviour which is, or can be related to potential problem gambling.

The following procedures have been implemented with an aim to tackle problem gambling and provide continuing support to those at risk of or experiencing harm as a result of their gambling activity. The procedures are being followed by the responsible gambling and other relevant operational employees dealing with clients, including Anti-Fraud, Customer Support and Payments teams, on their day-to day activity:

- Problem Gambling (PG) Alerts
- Player Protection Measure (PPM)
- Deposit and Loss Limits
- Third Party Concerns
- Under 18 Policy
- Account Self-Exclusion
- Account Cooling-Off
- Product Cooling-Off
- Account Re-opening
- Self-Assessment Tests

6. Employees Training

All relevant employees, as part of onboarding process, are subject to a mandatory induction responsible gambling session where are being introduced to company's vision, approach and relevant processes in place designed to protect players from potential harmful effects gambling may cause.

Subsequently, arrangements are in place to deliver all relevant employees on an annual basis, an annual responsible gambling refresher training which has mandatory attendance.

To ensure and assess the effectiveness of delivered training, at the end of each session, attendees are required to complete an assessment test created based on information delivered during the training.

All records about attendees and their test results are being stored by the responsible department and available upon request.

7. Responsible Marketing & Advertising

All marketing, promotional, and advertising activities adhere to responsible gaming principles, are not misleading or encouraging for excessive gambling.

All marketing efforts adhere to responsible gaming guidelines:

- No targeting of minors or vulnerable individuals.
- No misleading claims about gambling as a financial solution.
- No credit is offered for betting.
- Inclusion of responsible gambling messages in all advertisements.
- No use of child-friendly imagery, misleading skill-based claims, or excessive promotions.

All Self-Excluded or limited with Cooling-Off players are always removed from all marketing and promotional lists.