

Responsible Gaming Policy

Operator: Goodwin N.V.

Jurisdiction: Curaçao (LOK – National Ordinance on Games of Chance)

Regulator: Curaçao Gaming Authority (CGA)

Version: 1.0

Effective date: 29 September 2025

1. Purpose and Scope

This Responsible Gaming Policy (the “Policy”) sets out Goodwin N.V.’s (hereinafter - “Goodwin”) mandatory controls, procedures, disclosures, and governance measures to ensure that participation in Games of Chance remains a form of entertainment and does not cause or exacerbate gambling-related harm. The Policy implements the CGA’s Responsible Gaming requirements and constitutes Goodwin’s formal submission for CGA review and ongoing supervisory oversight.

This Policy applies to all B2C operations conducted under Goodwin’s Curaçao license (including all brands, domains, and mobile applications), to all game verticals offered, and to all employees and third-party representatives engaged in customer-facing activities, marketing, VIP services, payments, and platform operations.

2. Legal Basis and Regulatory Alignment

Goodwin adopts this Policy to satisfy the Responsible Gaming elements mandated by the CGA, including age verification, information accessibility, player self-assessments, behaviour tracking, cooling-off, self-exclusion, deposit limits, advertising and marketing controls, and staff training. Adherence to this Policy is required under the LOK and is enforceable by the CGA in accordance with its monitoring and enforcement procedures.

3. Definitions

- **Cooling Off** 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.
- **Games of Chance** 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

- **LOK** is the National Ordinance on Games of Chance law of Curacao.
- **Marketing, promotion and advertising** refer to all resources, messages and media that promote the Goodwin's domain(s), brand(s), products, or services.
- **Minor** means any person under the age of 18
- **Operator** means Goodwin N.V.
- **Self-exclusion** is an event where a player voluntarily bars themselves from all or certain online gaming-related activities with a specific operator.
- Vulnerable Person is defined as
 - Under eighteen years of age.
 - Has no, or insufficient, control over his or her gambling behaviour, 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.
 - Has been banned from playing any Game of Chance either by force or at his or her own request.
 - Has been declared bankrupt.

4. Governance, Accountability, and Reporting

4.1 Responsible Gaming Officer (RGO). Goodwin is going to appoint a suitably qualified Responsible Gaming Officer with independence from AML/CFT functions. The RGO shall be accountable for the implementation, effectiveness measurement, and continual enhancement of this Policy. In the absence of a dedicated RGO, the Compliance Officer assumes these duties.

4.2 Management Oversight. The RGO provides an effectiveness report to senior management at least once every twelve (12) months, including recommendations for operational and policy enhancements. Material changes to this Policy will be reported to the CGA.

4.3 Prohibition on Credit. Goodwin shall not offer credit for wagering purposes under any circumstances.

5. Prevention of Underage Gambling

5.1 Age Verification Controls.

- A Minor is restricted to register, deposit, wager, or otherwise participate in Games of Chance. Registration requires self-attestation of date of birth, an explicit "over 18" confirmation checkbox, and additional checks to achieve sufficient certainty that the registrant is not a Minor.
- Where Goodwin becomes aware that an account belongs to a Minor, the account shall be closed immediately. Civil law implications shall be assessed, which may include refunding all deposits and forfeiture of any winnings, with clear notification to the Minor of the reason for closure.
- Proof-of-age document checks will follow KYC/AML thresholds and in all cases prior to first withdrawal. Acceptable documents include valid government-issued passport, national ID, or

driver's license. Secondary checks (e-verification, payment validation, database and selfie checks) may complement but do not replace documentary verification.

- Goodwin maintains auditable records of all age-verification steps and outcomes, available to the CGA upon request.

6. Player Information and Accessibility

6.1 Responsible Gaming (RG) Section. Goodwin maintains a clearly identifiable RG Section across all brands, containing: (i) plain-English information enabling informed choices; (ii) direct access to RG tools (cooling-off, self-exclusion, limits, and other measures); and (iii) contact channels for RG concerns (email and chat). The RG Section will be available in English and the language(s) of each target market; in case of discrepancy, the English version prevails.

6.2 Homepage Accessibility. A clear, visible link to the RG Section is present on the homepage and in the app menu, together with RG contact details.

6.3 Terms & Conditions (T&Cs). The T&Cs explicitly reference the RG Section and the RG tools, explaining their functionality and use. The T&Cs are not more than one click away from the homepage.

7. Player Self-Assessment and Account History

7.1 Accessible Account History. Players can access at least six (6) months of detailed betting/wagering and transaction history, including timestamps, from their account interface. Longer periods are provided within 10 working days.

7.2 Self-Assessment Tools. Goodwin provides scientifically recognized screening tools (e.g., Gamblers Anonymous 20 Questions; CAGE adapted for gambling). Results guide players to RG tools and external support.

8. Behaviour Tracking, Detection, and Interventions

8.1 Risk-Based Monitoring. Goodwin employs both frontline monitoring (customer support, VIP) and technological systems (platform analytics, in-game tools) to holistically identify at-risk behaviour. The Operator considers single indicators are not determinative, but patterns and combinations of indicators are assessed.

8.2 Key Indicators. Goodwin monitors abrupt increases in deposits/wagering; repeated insufficient-funds failures; withdrawal reversals; inexplicably extended play; escalated bonus requests and agitation; frequent RG-tool changes; maxed credit cards; and attempts to open multiple accounts to bypass limits.

8.3 Player Profiling & Records. Player risk profiles are maintained in the Player Account Management (PAM) system, including indicators observed and all RG interactions.

8.4 Intervention Protocol. Interventions follow a documented escalation ladder: (i) inform the player about RG tools (limits, cooling-off, self-exclusion); (ii) impose mandatory deposit limits; (iii)

temporary suspension for assessment; and (iv) permanent exclusion in cases of severe or persistent risk. RG measures must never be used to delay or prevent legitimate withdrawals.

9. Player-Initiated Restrictions: Cooling-Off and Self-Exclusion

9.1 Cooling-Off.

- **Activation:** Self-service online from the RG Section; requests via chat / email are implemented within 24 hours where self-service is impracticable.
- **Duration Options:** 24 hours; 7 days; 1 month; 3 months (tick-boxes not pre-checked).
- **Brand & Vertical:** May be configured by Goodwin to apply to one brand or all brands; all verticals or selected verticals (e.g., Casino, Fixed-Odds Betting, Poker/P2P; with Casino sub-options such as “All Games” or “Slots Only”).
- **Effect:** Immediate block on wagering per the selected scope; account remains open for withdrawals; no deposits permitted; marketing disabled where the player opted out. No bonuses or inducements may be offered during the period. Reactivation is automatic upon expiry; no further action by the player is required.

9.2 Self-Exclusion (Long-Term, Irrevocable).

- **Activation:** Fully online, self-executed; in exceptional cases, via chat/email within 24 hours. A brief, neutral confirmation step shall follow (e.g., “You have chosen to self-exclude for 5 years. Please confirm.”).
- **Duration Options:** 1, 3, 5, 10 years, or lifetime. Applies to **all** brands/domains and **all** verticals; marketing is automatically disabled.
- **Effect:** Immediate and comprehensive. Account is closed and login blocked; Goodwin deploys robust duplicate-account controls and payment-method flags to prevent circumvention. Civil law implications are assessed (e.g., ante-post bets refunded/voided where required, tournaments in progress completed, progressive jackpot contributions remain in situ but no further participation).
- **Reactivation:** Only at the player’s written request after the exclusion period ends; operator-initiated re-engagement is prohibited. Record-keeping follows applicable retention rules.

9.3 Operator-Initiated Exclusion. Where problematic gambling is evidenced, or criminal activity is suspected, Goodwin may exclude a player. Exclusion **may not** be based solely on the amount of a player’s winnings. Records are formalized and retained for at least five (5) years for CGA inspection.

10. Player-Set Financial Limits

Deposit Limits. Players can set daily, weekly, or monthly deposit caps. Once reached, further deposits are blocked until the period resets. If changes are permitted while a limit is active, **tightening** takes immediate effect; **loosening** takes effect only after a 24-hour cooling-off. Existing resolved or unresolved wagers placed prior to setting a limit remain unaffected.

11. Training and Staff Readiness

Goodwin provides initial and periodic training for customer support, VIP teams, marketing, and any staff with customer interaction responsibilities. Training covers recognition of distress indicators (agitation, aggression, financial desperation), structured and sensitive conversations with at-risk players, correct application of RG tools, and referral to support resources.

12. Consumer Advertising and Marketing Controls

Goodwin prohibits irresponsible advertising and enforces the following standards:

- No targeting of Vulnerable Persons; no depiction of minors.
- No portrayal of gambling as an investment strategy or solution to financial problems; no misrepresentation of skill vs. chance; no emotional manipulation.
- No explicit/sexualized content; no linkage to smoking, drugs, alcohol, seduction, or attractiveness.
- Clear, transparent bonus conditions; no use of bonuses to encourage excessive play.
- All advertising must include a clearly visible Responsible Gaming message.
- Goodwin is responsible for third-party materials (affiliates, ambassadors, influencers, sponsorships) and contractually requires adherence to this Policy.

13. Data Protection and Confidentiality

All RG processing is performed in accordance with applicable data-protection laws. Player records related to RG measures are restricted to personnel with a “need to know,” safeguarded by access controls, encryption in transit and at rest (where supported), and subject to retention and deletion schedules consistent with legal and regulatory requirements.

14. High-Risk and Non-Retail Segments

Goodwin identifies and documents any high-risk business elements and calibrates enhanced measures accordingly; this Policy does not apply to non-retail professional players or syndicates, for whom general RG principles are applied in line with the business model.

15. Complaints and Escalations

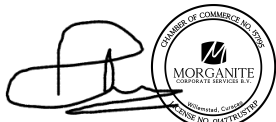
Players may raise Responsible Gaming concerns via live chat or the dedicated RG email published in the RG Section. Complaints are acknowledged promptly, investigated by the RGO or delegate, and resolved in accordance with internal SLAs. Where resolution is not possible, Goodwin provides information on further escalation, including regulatory contact details, as applicable.

16. Policy Review and Amendments

This Policy is reviewed at least annually by the RGO and senior management, and updated to reflect operational changes, risk assessments, regulatory updates, and audit findings. Material amendments are reported to the CGA and the latest version is published in the RG Section.

Statement of Attestation

Goodwin attests that this Policy reflects current operational controls and that the systems, processes, training, and disclosures described herein are implemented or in active deployment consistent with the CGA's implementation schedule. Goodwin commits to continuous improvement of Responsible Gaming measures proportionate to emerging risks and regulatory guidance.

The image shows a handwritten signature in black ink over a circular corporate seal. The seal features the Morganite logo (a stylized 'M' inside a circle) and the text 'MORGANITE' and 'CORPORATE SERVICES B.V.' around the perimeter. The seal also includes the text 'CHAMBER OF COMMERCE NO. 8002' and 'KONINKRIJK DER NEDERLANDEN'.

Morganite Corporate Services B.V.
Managing Director