

## **Responsible Gaming Procedure**

**Apex Analytica N.V.  
("the Company")**

V1.1 September 2025

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## Revision History

| Version # | Effective Date     | Approving Official | Responsible Office  | Next Review Date | Comments |
|-----------|--------------------|--------------------|---------------------|------------------|----------|
| 1.0       | May 20, 2025       | eMoore N.V.        | Compliance function | September, 2026  |          |
| 1.1       | September 30, 2025 | eMoore N.V.        | Compliance function | March, 2026      |          |

## Definitions and Abbreviations

|                          |                                                                                                                                                                                                                                                                                                                                                                                                      |
|--------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Advertisement activities | <p>Marketing, promotion and advertising of all resources, messages and media of 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.</p> <p>Bonuses also fall within advertisement activities.</p>                                                     |
| CGA                      | Curacao Gaming Authority                                                                                                                                                                                                                                                                                                                                                                             |
| Customer                 | Individual who has registered with the Company for the purpose of making use of the services offered on the Website and for which a Customer Account has been opened providing him/her with a username which can be activated using the Customer's email.                                                                                                                                            |
| Customer Account         | An account granted to an individual after registration on the Website. The Customer Account is created and issued by the Company and is required for wagering with real money. Only one Customer account is permitted per person, per IP address, per family and per Shared Environment.                                                                                                             |
| Game of chance           | Any game in which one or more Customers, 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 Customers' insight or skill, with no possibility for Customers to significantly influence the outcome, including sports betting and poker |
| LOK                      | National ordinance on the Game of Chance ('Landsverordening op Kansspelen')                                                                                                                                                                                                                                                                                                                          |

|                    |                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                        |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Vulnerable Persons | <ul style="list-style-type: none"> <li>a. Persons under eighteen years of age(minors);</li> <li>b. Person that 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>c. Person that has been banned from playing any Game of Chance either by force or at his or her own request;</li> <li>d. Person that has been declared bankrupt, or has otherwise lost the control or disposal of all or part of his or her property;</li> </ul> |
|--------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

## 1 Introduction and Policy Statement

The Company believes in a responsible attitude towards gambling and has implemented measures detailed within this document to promote and ensure responsible gambling. The Company believes that the industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for those Customers requiring assistance.

For the majority of people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. The Company acknowledges that for some people, gambling can have a negative impact on their life and therefore the Company has developed this Responsible Gaming Procedure (hereafter: the '**Policy**') which outlines certain practices adopted by us when providing services to our customers.

As part of the Company's problem gambling initiative all staff receive responsible gambling training as part of the induction process and annually thereafter.

The Company has appointed a designated Responsible Gaming person, who is responsible for implementing and enforcing the Policy. Furthermore, this designated person shall be the point of reference regarding this Policy and its related requirements.

## 2 Responsible Gambling

Responsible gambling involves the conduct of gambling in a manner where the potential for harm associated with gambling is reduced.

The Company respects the rights of our Customers to enjoy our services and to take responsibility for their own conduct but also acknowledges the duty to our customers to provide them with appropriate information that may assist them to manage their gambling. As a general principle no credit shall be offered to customers for the purpose of wagering.

The Company's aim is to ensure that customers make informed decisions about gambling and that if the customer requires assistance, to facilitate access to gambling help services.

The Responsible Gaming Policy for Licensed Operators as issued on April 17, 2025 by the Curacao Gaming Authority (hereafter: 'RG Policy CGA') sets out various obligations which must be adhered to. As part of the RG Policy CGA, the Company will prominently display:

- The license details through the dynamic seal on the page(s);
- A sign which indicates that under-age gaming is prohibited;
- A 'responsible gaming' message, explaining that gaming can be harmful if it is not controlled, and information about the Customer support measures;
- A direct link leading to the responsible gaming section which includes all relevant responsible gaming information required by the CGA;
- A direct link which enables Customers to refer to one or more gambling support organisations;

We prioritize the protection of our Customers through the following measures:

- Age Verification: Customers must be at least 18 years old to participate in any gaming activities. Age verification is done during the account registration process.
- Self-Assessment Tools: We provide self-assessment tools to help Customers evaluate their gaming behaviour and identify potential risks. These tools are accessible via our website;
- Behaviour Tracking: Our system monitor Customer behaviour to detect signs of problem gambling and intervene when necessary. This includes tracking deposit patterns, frequency of play, and time spent on gaming activities;
- Deposit Limits: Customers can set daily, weekly, or monthly deposit limits to manage their spending;
- Cool-off periods and Self-exclusion: Customers can opt for temporary cool-off periods or self-exclusion to take a break from gaming. Self-exclusion can be set for periods ranging from 1 year to lifetime.

### **3 Problem Gambling**

Problem gambling occurs when there is a lack of control over gambling, particularly the scope and frequency of gambling and the amount of recreational time spent gambling.

The negative impacts may include:

- Extreme financial losses relative to their sources of income;
- Adverse personal effect on the customer, his or her family and friends;
- Adverse effect on employers and work performance.

The Company's aim is to achieve equilibrium in the provision of gambling services, taking into account those Customers who enjoy our services and use them as a form of entertainment, the wellbeing of our Customers who have an acknowledged gambling problem, their families and the community at large.

### **4 Age verification**

The Company does not allow anyone under 18 years of age to play on their website(s). Age verification is conducted in accordance with the AML guidelines of the CGA.

In the unlikely event that an underage Customer does manage to play, all deposits will be returned to the customer regardless of win or loss. The account will be closed immediately.

The company will retain records of all age verification process and their outcomes according to the Company's record keeping obligations and for regulatory review by the CGA.

## 5 Information Visibility

The Company ensures that Customers can easily access responsible gaming information by:

- Visible Links: Our homepage displays a link to the responsible gaming policy, tools, and contacts. These links are also included in the footer of the homepage on our website
- Terms and Conditions: Clear references to our terms and conditions, including the prohibition of underage gambling, are provided. The terms and conditions are easily accessible and written in plain language;
- Responsible Gaming Organizations: Links to organizations that offer support for gambling addiction are available. These include local and international organizations, as per this policy.

## 6 Behavior tracking

The Company monitors customer activity to identify potential gambling problems. Behavior tracking will be done, amongst other elements, on the following factors:

- Deposit and wagering frequency;
- Repeated failed transactions due to insufficient funds;
- Reversing withdrawals;
- Inexplicable extended play sessions;
- Frequent changing to Responsible Gaming tools;
- Unreasonable increased communication with customer support;
- Attempts to open multiple accounts to bypass deposits or loss limits.

In version 1.2 of the Policy this will be further detailed as per the implementation schedule of the RG Policy CGA.

## 7 Self- exclusion

Self-exclusion is recognised by the gambling industry as a way for customers to control their gambling. The Company offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want our assistance to help them stop.

The self-exclusion request shall be applicable:

- A. To all brands/domains operated under the Company;
- B. All gambling activities related to one Casino vertical available on the Company's domain. If such option is provided by the Company to the Customer, as otherwise the self-exclusion under A will be provided for all gambling activities of the Company<sup>1</sup>;
- C. All advertisement activities of the Company. An automatic opt-out will be triggered when self-exclusion is activated

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<sup>1</sup> Casino verticals are types of groups wagering activity available on the domain of the online casino, such as casinos (i.e. slots, table games) and sports betting (i.e. horsebetting)

The duration of the self-exclusion period must be at least 1 year. The Customer shall be able to set the duration for 3 years, 5 years, 10 years or a lifetime.

The Customer should be able to set their preference ~~of~~ for the duration of the self-exclusion period online, without requiring email communication or prior approval from the Company. Once this is set, all exclusions related to brands/domains, vertical gambling activities and advertisement activities automatically applies immediately.

Any wagering that takes place following the self-exclusion request and prior to it being into effect will be voided and the funds returned to the Customer.

The Company should not question a Customer's decision regarding self-exclusion in general, nor will the Company offer bonuses to the Customer to encourage participation, or delay/complicate the self-exclusion activation process.

If a self-exclusion is applied, the following actions should be in place:

- The Customer's account is closed. The Customer can no longer log in.
- The Customer must complete any tournaments that is in-running at the time of the self-exclusion.
- Ante-posts bets will be voided and refunded subject to AML/CFT regulations.<sup>2</sup>
- Contributions to progressive jackpots that were made by the Customer through gameplay prior to the self-exclusion request remain, but the Customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect.
- No Advertisement activities shall be conducted towards the Customer.
- Any payment method used by the Customer will be blocked by the Company for future use during the term of the self-exclusion period.

The Company will implement measures to prevent self-excluded Customers from creating new Customer's account under different credentials.

The Company will retain records of self-excluded requests by Customers according to the applicable record keeping requirements.

## **7.1 Reactivation of customer's account after self-exclusion**

After the self-exclusion period ends, the Customer must request in writing (by email or chat) the unblocking of the account. The reactivation of the account cannot be instigated by the Company by re-commencing communications with the Customer.

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<sup>2</sup> Ante post bet bets are those placed in advance of the opening of betting market for that event

## **7.2 Company initiated self-exclusion**

The Company may exclude a Customer from gaming activities as a high-risk intervention measure if:

- The Customer displays problematic (gaming) behaviour
- The Customer attempts or engages in criminal activities through the Company's platform.

The Company will not exclude Customers solely on the basis of the amount of their winnings.

## **8 Time-Out/ Cooling off periods**

For Customers who wish to take a short break from gambling the Company offers a time-out/cooling off facility. Customers can set a time-out on their account through their account function or via live chat or e-mail for different timeframes, which will be further detailed in version 1.2 of this policy as per the implementation schedule of the RG Policy CGA.

During this time-out the Customer will have their account closed and all marketing material stopped.

## **9 Deposit Limits**

In line with the RG Policy CGA, the Company will offer the opportunity to set limits.

The Customer will have the possibility of setting Deposit Limits. This allows the Customer to limit the amount of money that can be deposited within a set timeframe; usually daily, weekly or monthly;

This will be further detailed in version 1.2 of this policy as per the implementation schedule of the RG Policy CGA.

## **10 Reality Checks**

Customers shall be able to receive and see on the screen a reality check within a gambling session.

A reality check notifications offers the Customer the option to exit the gambling session e.g. log out.

This will be further detailed in version 1.3 of this Policy as per the implementation schedule of the RG Policy CGA.

## **11 Customers Protection Measures**

In order to prevent and combat problem gambling we provide, through our Responsible Gambling page, a number of measures to assist our Customers including:

### **11.1 Independent Organizations**

The website of the Company will display the direct links to:

<https://gamblingtherapy.org/information/where-can-i-get-help/>

and /or

<https://www.gamcare.org.uk/self-help/links-to-other-support-agencies/international-support-contacts/>

and/or

<https://www.gambleaware.org>

as well as to specific names of organizations offering treatment options in case these are available in the target market of the Company. These links will be readily available on the footer of the website.

### **11.2 Problem Gambling Self-Assessment**

The Responsible Gaming section on the website will contain information that any Customer can assess to help them identify any potential problem gambling behavior. The Responsible Gambling page shall contain a simple checklist that anyone who thinks they have a problem gambling can work through and get an insight into whether they do have a problem, which will be further detailed in version 1.3 of this policy as per the implementation schedule of the RG Policy CGA.

### **11.3 Gambling History**

A registered participant's gambling history is available, including all deposits and withdrawals. This information allows a Customer to monitor their gambling spend. A full statement can be found within the Customer Account or can be requested by contacting the customer support team.

### **11.4 Language**

All problem gambling material and content is available in English language only as well as the language of the target market(s). Procedures remain the same irrespective of language.

### **11.5 Duplicate Accounts**

The company will take measures in order to prevent Customers from opening duplicate accounts on the Website, which measures will be further detailed in version 1.3 in accordance to the implementation schedule of the Responsible Gaming policy CGA.

## **11.6 Advertisement activities**

The Company shall engage in responsible advertising. According to the LOK, The Company must ensure that its marketing and advertising activities, including the offering of bonuses:

- do not encourage excessive gaming.
- are not misleading, thus f.e. do not portray gaming as an investment, misrepresent skills vs games of chance as mentioned in the CGA RG Policy.
- do not target Vulnerable persons.

All advertisement done by the Company or third parties hired by the Company will include a clearly visible Responsible Gaming message or slogan.

## **12 Bonus conditions**

As bonuses are regarded by the CGA as advertisement activities, they fall under responsible advertisement conditions under the LOK and the CGA RG Policy.

Therefore, the Company will communicate to the Customer the terms and conditions of any bonus and/or promotion clearly. Furthermore, the Company is committed to not use any bonus to encourage excessive gaming.

### **12.1 Third party responsibility**

The Company shall make any contracted third-party aware of their Responsible Gaming Policy and require them to adhere to it.

The Company is accountable for materials provided to affiliates, representatives, sponsorship, ambassadors social media influences, including wordings and visuals representations, in case these influencers actions and/ or statements pertain to paid placement of advertisements.

Any Customer who is currently under a period of self-exclusion (cooling off) or a permanent exclusion due to problem gambling, will be removed from all marketing correspondence lists. No marketing or promotional materials is to be sent to excluded Customers.

## **13 Internal evaluation**

The Company understands that evaluation of Customer interactions is important to understand the impact they have had and to help ensure customers are getting the right help and support.

The findings of the Customer interaction evaluations are to be reported to the management of the Company.

This Policy and the Company's approach to customer interaction can then be amended using the findings from the evaluation.

## **14 Training**

Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to all staff. All staff are provided with induction training on responsible gambling, and annually thereafter.

To ensure best practice, ad-hoc training may also be provided to employees to discuss findings following evaluations. Further details on this topic will be implemented in version 1.3 in line with the implementation schedule of RG Policy CGA.