

Responsible Gaming Policy

Sapphire Curacao N.V.

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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 individuals 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.

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 player 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 players to refer to one or more gambling support organisations;

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

- Age Verification: Players 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 players evaluate their gaming behavior and identify potential risks. These tools are accessible via our website;
- Behavior Tracking: Our system monitors player behavior 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: Players can set daily, weekly, or monthly deposit limits to manage their spending;
- Cool-Off Periods and Self-Exclusion: Players 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 six months to five years.

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 player does manage to play, all deposits will be returned to the customer regardless of win or loss. The account will be closed immediately.

5. Information Visibility

The Company ensures that players 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. Behaviour 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 players 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 Company takes all reasonable steps to refuse service or to otherwise prevent the individual who has entered a self-exclusion agreement from participating in gambling, which will be further detailed in version 1.1 of this Policy as per the implementation schedule of the RG Policy CGA.

8. Time-Out/ Cooling off periods

For players who wish to take a short break from gambling the Company offers a time-out/cooling off facility. Players 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 player 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 player will have the possibility of setting Deposit Limits – Allows the player 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

Players shall be able to receive and see on the screen a reality check within a gambling session. A reality check notifications offers the player 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. Player Protection Measures

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

11.1 Independent Organizations

The website of the Company will displays 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 player 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 player to monitor their gambling spend. A full statement can be found within the players 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 players 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.

12. Advertising and Promotions

The Company makes sure that advertising or promotions comply with all applicable laws associated to the advertising and promotion of gambling products. Such advertising and promotions will be rolled out in a socially responsible manner.

Any player who is currently under a period of self-exclusion (cooling off) or indeed a permanent exclusion due to problem gambling, shall be removed from all marketing correspondence lists. As such, no marketing or promotional materials shall be sent to excluded players.

Furthermore, no marketing or promotional materials shall knowingly and deliberately target vulnerable people, as per the definition of clause 1.1 h of the LOK.

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.

Revision History

Version #	Effective Date	Approving Official	Responsible Office	Next Review Date	Comments
1.0	May 19, 2025	XCM B.V.	Compliance function	May 1, 2026	-
1.0.1	May 28, 2025	XCM B.V.	Compliance function	May 1, 2026	Minor formatting adaptations