

Responsible Gaming Policy

Topc B.V.

(A company registered in Curaçao with registration number
163568)

Registered Office: Korporaalweg 10, Curaçao

Effective Date: 20.07.2025

1. Company Details

This Responsible Gaming Policy (“Policy”) is adopted by Topc B.V., a company registered in Curaçao with registration number 163568 and its registered office at Korporaalweg 10, Curaçao (hereinafter referred to as “Company”, “we”, “us”, or “our”).

2. Definitions

CGA means the **Curacao Gaming Authority**, the official regulatory body responsible for overseeing licensed gambling operations in Curaçao.

Cooling Off refers to a self-imposed, pre-determined period — ranging from hours to months — selected by the player, during which no wagering or gambling activity is permitted.

Games of Chance are defined as 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. The outcome of these games is determined either solely by chance or by a combination of chance and a player’s insight or skill, without allowing players to significantly influence the result. This includes, but is not limited to, sports betting and poker.

LOK refers to the **National Ordinance on Games of Chance**, the primary legal framework governing gambling activities in Curaçao.

Marketing, Promotion, and Advertising encompass all materials, messages, and media used to promote the operator’s domain(s), brand(s), products, or services. This includes, but is not limited to, print advertisements, digital marketing, content marketing, and social media campaigns.

Mandatory Requirements are the essential components of a Responsible Gaming policy that every licensed operator is obligated to implement. These components must be tailored to the operator’s target markets and player base.

Minor means any individual who is under the age of 18.

Operator refers to an entity that holds a valid Business-to-Consumer (B2C) license issued by the Curacao Gaming Authority, or an entity that holds an Orange Digital Seal “Certificate of Operations”.

Self-Exclusion is the process by which a player voluntarily prohibits themselves from participating in all or certain types of online gambling activities with a specific operator.

Vulnerable Person is defined in Clause 1.1(h) of the LOK as any individual who:

1. Is under eighteen (18) years of age;
2. Lacks, or has insufficient, control over their gambling behaviour and, as a result, is or may become addicted to one or more Games of Chance, thereby causing harm to themselves or others;
3. Has been banned from participating in Games of Chance, either through external enforcement or by their own request;
4. Has been declared bankrupt.

3. Policy Statement

We recognize that gambling should remain a form of entertainment and not a source of financial, emotional, or psychological harm.

As an online gaming operator, we integrate Responsible Gaming principles into every aspect of our business model. This Policy includes proactive and preventative measures aimed at protecting

Vulnerable Persons, promoting responsible play, and mitigating or preventing problem gambling behavior.

Our Responsible Gaming Policy ensures:

- The availability of a clear and accessible Responsible Gaming policy for all players;
- Provision of effective Responsible Gaming tools and informational resources;
- Implementation of monitoring mechanisms to detect and address problematic behavior;
- Full compliance with all regulatory reporting, audit, and player protection obligations;
- No credit is offered to players for the purpose of wagering, as a general principle.

Furthermore, Topc B.V. operates a business model that incorporates cryptocurrency as a payment and wagering method. As such, we fall within the scope of a **High Risk Business Model** as defined by the CGA. Accordingly, our Responsible Gaming framework has been specifically tailored to address the elevated risk factors associated with:

- Anonymity and speed of cryptocurrency transactions;
- Increased volatility in player spending behavior;
- Potential for higher value deposits and wagering through digital assets;
- Risk exposure from unregulated or pseudonymous jurisdictions.

Topc B.V. acknowledges these inherent risks and implements enhanced Responsible Gambling controls, tools, and monitoring systems designed to safeguard players, meet CGA expectations, and maintain the integrity of our operations in a high-risk environment.

Topc B.V. has established the following core objectives to support and promote responsible gambling across all of its operations:

Protect Vulnerable Persons from Gambling-Related Harm

We are committed to identifying, supporting, and protecting individuals who may be at risk of developing gambling-related problems. This includes ensuring that minors and other vulnerable persons—such as those suffering from addiction, mental health challenges, or financial distress—are prevented from accessing our services. We implement effective screening, intervention, and exclusion tools to minimize potential harm and uphold a duty of care to all players.

Ensure Transparency in Gambling Practices

We strive to maintain the highest level of transparency in all of our gaming services. This includes providing players with clear and accurate information regarding game rules, terms and conditions, odds, payout percentages, and the nature of risk involved in gambling. We aim to empower players with the knowledge needed to make informed decisions, thereby fostering a safe and trustworthy gaming environment.

Facilitate Self-Assessment and Personal Control

Our platform enables players to monitor, evaluate, and manage their gambling behaviour through a range of user-friendly Responsible Gaming tools. These include deposit limits, loss limits, session timers, self-assessment questionnaires, cooling-off periods, and self-exclusion features. We encourage players to take personal responsibility for their gambling activity and offer tools that promote safe and controlled play.

Ensure Full Compliance with LOK and CGA Directives

We uphold and enforce all requirements set forth by the National Ordinance on Games of Chance (LOK) and the Curacao Gaming Authority (CGA). This includes adhering to mandatory Responsible Gaming measures, implementing robust player protection frameworks, submitting policies for regulatory review, and ensuring ongoing compliance through internal audits and reporting procedures. Regulatory compliance is integral to maintaining our license and our commitment to responsible conduct.

4. Mandatory Measures

To ensure full compliance with the requirements set out by the **Curacao Gaming Authority (CGA)** and the **National Ordinance on Games of Chance (LOK)**, Topc B.V. implements the following **mandatory Responsible Gaming measures** as part of its core operational framework:

1. Age Verification

We enforce rigorous age verification procedures to prevent minors (individuals under the age of 18) from accessing or participating in gambling activities. Verification processes include date-of-birth self-declaration, government-issued identification checks, and age verification at key account activity milestones, e.g. funds withdrawal. Any account found to belong to a minor is immediately closed, with all civil and legal implications addressed.

2. Information Accessibility

Our Responsible Gaming (RG) information is prominently displayed and easily accessible throughout our website and app. A dedicated RG section is available in English and the primary language(s) of our target markets. This section provides essential tools and support resources, and is clearly linked from the homepage and footer of the site.

3. Player Self-Assessments

Players are encouraged to evaluate their gambling habits regularly. We provide scientifically recognized self-assessment tools, including screening questionnaires and historical activity logs. These empower players to make informed decisions about their gambling behavior and to identify early signs of potential harm.

4. Behaviour Tracking

We use a combination of automated monitoring tools and manual frontline observation to track gambling behavior and detect indicators of problematic activity. Key risk factors such as deposit frequency, reversed withdrawals, excessive playtime, and RG tool manipulation are assessed. Structured intervention protocols are in place to manage such risks responsibly.

5. Cooling-Off Periods

We offer players the ability to temporarily suspend their gambling activity through customizable cooling-off periods. These range from 24 hours to three months and are designed to give players time to regain control over their behavior. Marketing opt-outs and game-specific restrictions are also provided during the cooling-off period.

6. Self-Exclusion

Players may choose to self-exclude for a fixed period (1, 3, 5, 10 years, or lifetime) from all gambling services offered under our license. Self-exclusion is fully automated, irreversible for the selected term, and immediately enforced across all brands and products. No marketing communication is permitted during the exclusion period.

7. Deposit Limits

Players may set deposit limits on their accounts to control their spending. These measures are essential in supporting sustainable gambling practices.

8. Training of Employees

All staff, particularly those in customer support, VIP management, and marketing, receive regular Responsible Gaming training. This includes recognizing signs of gambling distress, engaging in sensitive conversations with players, and guiding them toward the use of RG tools and external support services.

9. Consumer Advertising and Marketing

Our marketing activities aim to exclude vulnerable individuals and minors. All promotions must include responsible gaming messages and comply with advertising standards set by the CGA. Bonus offerings are transparently communicated and must not encourage excessive gambling or portray gambling as a solution to financial or emotional problems.

5. Responsible Gaming Officer and Internal Governance

In compliance with the expectations of the Curacao Gaming Authority (CGA), Topc B.V. has appointed a suitably qualified individual to oversee the implementation, monitoring, and enforcement of this Responsible Gaming Policy.

Regardless of the appointment model, the Responsible Gaming Officer must:

Ensure the ongoing implementation and operational compliance with this Responsible Gaming Policy and all related procedures;

Monitor player behavior and internal processes to detect risks and recommend appropriate interventions or updates;

Prepare and present a comprehensive report to the company's senior management, evaluating the effectiveness of the RG measures in place, supported by data, trends, incidents, and regulatory developments;

Maintain detailed documentation of all RG activities, interventions, and escalations;

Liaise with internal departments (e.g., customer support, marketing, VIP teams) to ensure coordinated and effective RG enforcement across all touchpoints.

Any material changes to this Responsible Gaming Policy must be reported to the CGA without delay and submitted for evaluation via the CGA license holder portal. The Responsible Gaming Officer shall be responsible for coordinating such submissions and ensuring policy alignment with all current regulatory obligations.

6. Age Verification

Company maintains a zero-tolerance policy toward underage gambling. Minors under the age of 18 are strictly prohibited from accessing or participating in any gambling activities offered on our platform, regardless of jurisdiction or local age limits.

In accordance with Article 1.4(d) of the National Ordinance on Games of Chance (LOK), it is expressly prohibited for a licensed operator to allow any minor the opportunity to participate in games of chance. To ensure strict compliance, Topc B.V. has implemented a multi-layered age verification process, designed to confirm the legal age of all players.

Our Age Verification Procedures Include:

Self-Attestation at Registration:

During the registration process, players are required to provide their date of birth and confirm—via an unchecked checkbox—that they are 18 years of age or older.

Verification via Government-Issued Identification:

Upon reaching defined account thresholds or prior to the first withdrawal, all players must submit a valid, government-issued ID (e.g., passport, national ID, driver's license). This is a mandatory requirement under the CGA's KYC and AML framework.

Secondary Verification Methods:

Additional verification tools may be used at our discretion to enhance accuracy, such as:

Electronic verification systems;

Payment method validation;

Third-party or government database checks;

Selfie or biometric verification.

These tools complement but do not replace the requirement for submission of a valid ID.

Immediate Closure of Underage Accounts:

If it is determined—at any point—that a player is underage:

The account is closed immediately;

All deposited funds may be refunded (subject to applicable AML checks);

Any winnings are forfeited;

The player is informed clearly and promptly of the reason for account closure;

A permanent block is placed to prevent re-registration.

Record Keeping and Audit Trail:

All age verification processes and outcomes are logged, retained, and stored in accordance with CGA regulatory requirements. These records are made available for audit upon request by the regulator.

Civil and Regulatory Implications:

Company understands the legal and ethical obligations related to underage gambling. The failure to prevent a minor from accessing gambling services can result in serious civil consequences and regulatory penalties. Therefore, our internal controls are continuously reviewed and enhanced to meet the highest standards of due diligence and player protection.

7. Player Information & Accessibility

We maintain a clearly identifiable and easily accessible Responsible Gaming Section (RG Section), which is prominently linked throughout our website. This section is designed to empower players by providing essential information and direct access to Responsible Gaming tools. Specifically, the RG Section:

Contains clear, user-friendly information to help players make informed choices about their gambling activity;

Provides immediate access to key tools such as:

Self-exclusion

Cooling-off periods

Deposit and loss limits

Reality check and time reminders;

Clearly displays contact options (e.g., live chat and support email) for players seeking Responsible Gaming assistance;

Is available in English and in the primary language(s) of the target market. In the event of any discrepancy, the English version shall prevail as the authoritative source.

To ensure visibility and ease of use:

A visible and accessible link to the RG Section shall be displayed on the homepage of the website and mobile application at all times;

Contact details for Responsible Gaming support (email or live chat) shall be clearly displayed on the homepage and within the RG Section;

The layout is designed to ensure no more than one click shall be required for users to access key RG resources from the homepage.

Terms and Conditions Inclusion

The Responsible Gaming Policy and related tools shall be explicitly referenced and integrated into the platform's Terms & Conditions;

Our Terms & Conditions are located within one click from the homepage;

Players are informed about the availability and functionality of all Responsible Gaming tools within the Terms & Conditions and during onboarding (registration and deposit processes).

The footer of our website shall include all the required regulatory disclosures and Responsible Gaming resources. This includes:

A clear visual warning that underage gambling is prohibited;

The full legal name and registered address of Topc B.V.;

Our official license number as issued by the Curacao Gaming Authority;

A regulatory statement indicating that our operations are licensed and overseen by the CGA;

A direct link to the Responsible Gaming Section;

Display of the CGA digital seal (Orange Seal or equivalent certification);

Links to international gambling support organizations, such as:

GamCare (<https://www.gamcare.org.uk>)

Gamblers Anonymous (<https://www.gamblersanonymous.org>)

GambleAware (<https://www.begambleaware.org>)

Where applicable, links to local support services in the target market will also be provided.

8. Self-Assessment

We offer self-assessment tools (e.g., GA 20-question test, CAGE) and allow users to view their gaming history.

Transaction History Access

Players have the ability to access a detailed record of their betting and wagering activity via their account dashboard. This includes:

- **At least six (6) months** of transactional history, including deposit and withdrawal records, individual bets placed, and timestamps for each transaction.
- Players may request access to **longer transaction periods**, which must be provided **within 10 working days** of the request.
 - If exceptional circumstances apply, and this timeline cannot be met, Topc B.V. will provide a valid explanation and may request an extension from the CGA.

These records enable players to assess how much time and money they have spent on gambling and support informed decision-making around setting limits or taking a break.

Self-Assessment Questionnaires

We shall provide access to multiple **scientifically recognized self-assessment tools**, including:

- The **Gamblers Anonymous 20-Question Test**
- Available at: <https://gamblersanonymous.org/20-questions>
This comprehensive tool helps individuals identify whether their gambling behavior may be problematic.
- The **CAGE Questionnaire (Adapted for Gambling)**
A brief screening tool composed of four diagnostic questions:

1. **C – Cut Down:** Have you ever felt you should cut down on your gambling?

2. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
3. **G – Guilty:** Have you ever felt guilty about your gambling?
4. **E – Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results:

- **0 “Yes” answers:** Low risk of gambling problems.
- **1 “Yes” answer:** Possible moderate risk; further self-evaluation recommended.
- **2 or more “Yes” answers:** High risk; further assessment and the use of responsible gambling tools is strongly advised.

These tools shall be fully integrated into our Responsible Gaming Section and are accessible 24/7.

Recommendations and Support

Players who identify signs of problem gambling through these assessments are:

- Encouraged to make use of our **available Responsible Gaming tools**, such as deposit limits, cooling-off periods, and self-exclusion;
- Provided with **links to external support organizations**, including GamCare, Gamblers Anonymous, and GambleAware;
- Advised to seek professional help where needed, with confidentiality and support assured.

9. Behaviour Tracking & Intervention

Behaviour Tracking & Intervention

To support responsible gambling and minimize harm, a system of **active behavioural monitoring** is in place. This enables the detection of potential problem gambling through a combination of **real-time analysis, frontline staff interaction, and technological tools**. Operators are obligated, under **Article 1.4(e) of the LOK**, to **prevent individuals who can reasonably be assumed to be vulnerable from participating in games of chance**.

Behaviour Monitoring Approach

Monitoring is conducted through:

- **Frontline teams**, such as customer support agents and VIP managers, who interact directly with players and are trained to recognize behavioural warning signs;
- **Automated systems and platform tools**, including the use of AI and machine learning (ML), that detect behavioural anomalies and flag high-risk accounts for review.

Behavioural analysis is based on a **holistic review** of a player's activity, not isolated incidents. A player is not automatically deemed at-risk based on a single factor, but rather **multiple indicators occurring simultaneously or consistently** may trigger a risk assessment and intervention process.

Key Behavioural Risk Indicators (Section 8.1)

Monitoring systems and staff are trained to identify the following red flags:

- **Unexplained spikes in deposit or wagering amounts;**
- **Multiple reversed or cancelled withdrawal requests;**
- **Inexplicably long or continuous play sessions;**
- **Frequent failed deposit attempts due to insufficient funds;**
- **Excessive or agitated contact with customer support,** particularly when linked to financial issues or bonus requests;
- **Repeated adjustments to RG tools,** such as frequently resetting deposit or loss limits, or using cooling-off tools inconsistently;
- **Use of maximum credit card limits** or repeated funding from high-risk payment sources;
- **Attempts to open multiple accounts** to evade existing limits or exclusions.

Structured Process for Flagging & Escalation

When behavioural indicators are detected:

1. A **structured internal process** is triggered for further review and documentation.
2. Frontline staff may escalate the case to designated RG personnel or compliance officers.
3. A **risk-based assessment** determines whether the player requires an intervention.

Intervention Measures

Depending on the risk level, the following actions may be taken:

- **Proactive communication** with the player, informing them of the Responsible Gaming tools available (e.g., limits, cooling-off, self-exclusion);
- **Application of account-level restrictions,** such as mandatory deposit limits;
- **Temporary or permanent account suspension** if a player's behaviour poses significant harm or risk;
- **Referral to professional support services** for players exhibiting signs of addiction or distress.

Under no circumstances may Responsible Gaming interventions be used to **delay legitimate withdrawal requests** or as a tactic for financial retention. Misuse of these measures constitutes a violation of license conditions.

9.1 Key Monitoring Factors

The operator must apply a systematic and consistent approach to detecting behavioural patterns that may indicate gambling-related harm. Monitoring systems—both manual and automated—must be capable of flagging the following risk indicators, which, especially in combination, may suggest the need for intervention:

- **Deposit and Wagering Frequency:**

Sudden and unexplained increases in deposit amounts or wagering volume, particularly when inconsistent with a player's prior behaviour, may indicate loss of control.

- **Repeated Failed Transactions:**

Multiple failed deposit attempts due to insufficient funds or rejected payment methods may reflect financial distress and warrant closer examination.

- **Reversing Withdrawals:**

Repeated cancellation of requested withdrawals before completion—especially when followed by continued gambling activity—is a strong risk indicator.

- **Extended Play Sessions:**

Unusually long or continuous gaming sessions, especially at irregular hours or without apparent breaks, may suggest compulsive behaviour.

- **Heightened Support Contact Frequency:**

Frequent or emotional communication with customer support—particularly regarding bonuses, refunds, or account limits—can reflect player agitation or loss-chasing tendencies.

- **Manipulation of Responsible Gaming Tools:**

Recurrent changes to deposit, loss, or time limits (e.g., reducing then increasing limits repeatedly), or frequent use of cooling-off periods, may reflect attempts to override self-imposed controls.

- **Maxing Out Credit Facilities:**

Players using their full credit card limits or making back-to-back high-value transactions may be experiencing impaired financial judgment.

- **Multi-Account Attempts:**

Attempts to open multiple accounts under the same or different credentials in order to bypass existing account restrictions (limits, self-exclusion, etc.) must be identified and addressed immediately.

Monitoring may also include behavioural analytics, player segmentation, and real-time pattern recognition using AI and machine learning where appropriate.

9.2 Procedures for Player Identification and Intervention

A clear, consistent, and well-documented Responsible Gaming escalation protocol must be implemented. Upon detection of one or more key indicators, the following procedures must be followed:

9.2.1 Player Profiling and Risk Assessment

A dynamic player profile shall be maintained for each account. This profile shall include transactional data, usage of RG tools, customer service interactions, and any previously observed behavioural trends.

A risk-based approach must be applied to determine the severity of the indicators. The presence of multiple risk signals may elevate the player's risk classification and require urgent intervention.

All Responsible Gaming-related events (whether initiated by the operator or the player) must be logged within the Player Account Management (PAM) system, including:

The trigger for review (e.g., behavioural flags),

The type of interaction (e.g., outreach or restriction),

The outcome and any follow-up actions taken.

9.2.2 Responsible Gaming Interventions

When a player is identified as exhibiting at-risk or problematic behaviour, appropriate interventions without delay must be initiated. These may include:

Information and Education:

The player is informed of the available RG tools and encouraged to use features such as deposit limits, session timers, cooling-off periods, or self-exclusion.

Escalation Protocols:

Based on severity, the operator may:

Apply mandatory limits (e.g., daily deposit caps);

Temporarily suspend the player's account while further review is conducted;

Permanently exclude the player from the platform, particularly where there is persistent or serious risk.

Respect for Player Rights:

Under no circumstances may Responsible Gaming measures be used to:

Delay or obstruct legitimate player withdrawals;

Justify unjustified account retention or bonus withholding.

Any misuse of protective RG measures for financial or operational gain will be treated as a breach of licensing obligations.

10. Cooling-Off and Self-Exclusion

Effective processes and tools that empower players to manage their gambling behavior must be implemented and maintained. Two key mechanisms must always be available to players via the Responsible Gambling section of the website or app:

- **Cooling-Off:** A short-term, temporary restriction from gambling activities that the player can customize.
- **Self-Exclusion:** A long-term, irrevocable exclusion from all gambling activities under the operator's license.

Players must not be guided or influenced toward one option over the other. No interference, bonuses, or reassurances may be provided. Players must be clearly informed about the differences between these options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable.

Key differences between Cooling-Off and Self-Exclusion:

- **Wagering:** Cooling-Off allows the player to restrict wagering either on all or selected verticals, while Self-Exclusion prohibits wagering on all verticals entirely.
- **Deposits:** Deposits remain allowed during Cooling-Off, but may be restricted or prohibited during Self-Exclusion depending on civil law requirements.
- **Withdrawals:** Withdrawals are generally permitted during Cooling-Off. For Self-Exclusion, withdrawals may depend on applicable civil laws.
- **Login Access:** Players can still log in during Cooling-Off, but login is blocked during Self-Exclusion.
- **Brands:** Cooling-Off can be applied either to the current brand or to all operator brands, as selected by the player. Self-Exclusion applies to all brands and domains under the operator's license.
- **Duration:** Cooling-Off periods range from a minimum of 24 hours up to 3 months. Self-Exclusion periods are much longer, starting at 1 year and up to permanent exclusion.
- **Changes:** Cooling-Off settings can be made more restrictive or extended, whereas Self-Exclusion selections cannot be changed once set.
- **Ante-post Bets:** Ante-post bets remain active during Cooling-Off but are refunded or canceled during Self-Exclusion.
- **Active Tournaments:** Ongoing tournaments (e.g., poker) may be completed under both Cooling-Off and Self-Exclusion conditions.
- **Marketing Communications:** Marketing messages can be opted out of during Cooling-Off, but all marketing and advertising is completely blocked during Self-Exclusion.
- **Activation:** Both Cooling-Off and Self-Exclusion are primarily self-executed by the player online with very limited operator intervention.
- **Reactivation:** Cooling-Off ends automatically after the selected period expires. Reactivation after Self-Exclusion requires a written request by the player.

10.1 Cooling-Off

10.1.1 Overview

The platform shall provide the players with the option to activate a cooling-off period during which they are temporarily restricted from gambling. Players must be able to select their preferences in the following categories:

- **Duration:** mandatory
- **Brand:** optional (includes primary and mirror domains)
- **Vertical:** optional
- **Marketing Opt-Out:** mandatory

Players must select their preferences by ticking checkboxes that must not be pre-selected.

10.1.2 Duration Options

Players can choose from 24 hours, 7 days, 1 month, or 3 months.

10.1.3 Vertical Options

Players may choose to restrict all gambling activities or individual verticals such as Casino, Fixed Odds Betting, Poker, and other peer-to-peer games. Casino vertical may be subdivided into all games or slots only.

10.1.4 Brand Options

Players can apply restrictions either to the current brand (website and/or app) or all brands operated by the license holder.

10.1.5 Marketing

Players may opt out of marketing communications during the cooling-off period.

10.1.6 Actions and Implementation

- **Timing:** Restrictions must take effect immediately and be enforced according to the player's selections.
- **Operator Restrictions:** Operators must not question the player's decision, offer incentives to continue gambling, or complicate or delay the activation process.
- **Verification:** Operators may implement a neutral online confirmation step for 1- or 3-month periods (e.g., "You wish to cool off for one month. Please confirm").
- **Account Status:** Player funds remain accessible for withdrawal. The account stays active but with gambling functionality disabled.
- **Marketing:** No marketing materials should be sent if the player has opted out. No bonuses or incentives may be offered during this period.

10.1.7 Reactivation

Accounts must be automatically reactivated once the cooling-off period expires. No action is required by the player.

11.2 Self-Exclusion

11.2.1 Overview

Players must be provided with the option to self-exclude from all gambling activity across all brands and verticals under the operator's license. The player must select the exclusion duration via checkboxes; all other elements are applied automatically. Self-exclusion must be able to be initiated and completed fully online without operator approval.

11.2.2 Duration Options

Self-exclusion periods offered are 1, 3, 5, or 10 years, or permanent (lifetime).

11.2.3 Actions and Implementation

- **Timing:** Restrictions take effect immediately upon selection.

- **Civil Law Considerations:** Any wagers placed after the exclusion request but before it takes effect may need to be voided and refunded.
- **Operator Restrictions:** Operators must not question the player's decision, offer bonuses, or complicate the activation process.
- **Verification:** A simple online confirmation can be used to ensure the player understands their choice (e.g., "You have chosen to self-exclude for 5 years. Please confirm").
- **Account Status:** The account is closed and login is blocked. Operators must have robust mechanisms to detect and prevent creation of duplicate accounts by self-excluded players.
- **Ante-post Bets:** Ante-post bets must be voided and refunded where applicable.
- **Ongoing Tournaments:** Players may complete tournaments active at the time of exclusion.
- **Progressive Jackpots:** Contributions remain but participation is suspended during the exclusion period.

11.2.4 Marketing and Communication

No direct marketing, bonuses, or advertising are permitted during the self-exclusion period across all channels (email, SMS, push notifications, social media).

11.2.5 Reactivation and Post-Exclusion Protocol

At the end of the self-exclusion period, players must submit a written request (email or live chat) to reactivate their account. Reactivation cannot be initiated by the operator. Operators must:

- Verify the identity and intention of the player.
- Maintain records of exclusions and reactivations for regulatory compliance.
- Block payment methods previously used by the self-excluded player during the exclusion period to prevent circumvention.

11.3 Operator-Initiated Exclusion

The company may enforce exclusion on a player if:

- There are clear signs of problematic gambling behavior.
- The player attempts to circumvent responsible gambling tools or demonstrates vulnerability.
- The player is suspected of fraudulent or criminal activity on the platform.

All operator-initiated exclusions must:

- Be formally documented with justification based on observed behavior or rule violations.
- Records must be retained for a minimum of five years.
- Not be used solely to prevent large withdrawals or account closures.

12. Deposit Limits

Players must be provided with tools to control and moderate their gambling behavior by setting deposit limits. Players can customize limits on their deposits over daily, weekly, or monthly periods, enabling them to tailor restrictions according to their individual gaming habits.

12.1 Deposit Limits

- Players may set deposit limits on a **daily**, **weekly**, or **monthly** basis.

- Once a deposit limit is reached, the system must **block any further deposits** until the limit period resets.
- If a player **increases the severity** of their deposit limit (i.e., lowers the allowed deposit amount), the change must take effect **immediately**.
- If a player **decreases the severity** of their deposit limit (i.e., raises the allowed deposit amount), a **24-hour cooling-off period** is required before the change can be implemented.
- Any wagers, whether resolved or unresolved, placed **prior to** the deposit limit being set or modified remain **unaffected** by the new limits.

12.2 Exceptions to Limits and Exclusions

Certain active wagers or gameplay situations may affect how deposit limits or exclusions are applied, including but not limited to:

- **Active Poker Tournaments:** If a time limit or exclusion is set while the player is actively participating in a poker tournament, restrictions must be enforced immediately except for the ongoing tournament. The player is not permitted to enter new tournaments or place new wagers until the current tournament has concluded.
- **Unresolved Ante-Post Bets:** If the player has unresolved ante-post bets on future events, any deposit limits or exclusions take effect immediately; however, wagering on those unresolved bets remains valid until resolved. No new wagers may be placed until the ante-post bet is settled.

In all such cases, the company must honour the imposed restrictions immediately, except that **active gameplay or wagers in progress may be allowed to complete**. No further wagering or gameplay activity may be initiated until these events conclude.

13. Staff Training

All customer-facing personnel, particularly those in support and VIP teams, must undergo comprehensive training to effectively identify vulnerable or at-risk players and to handle sensitive situations with utmost professionalism. This training equips staff to recognize signs of gambling distress, such as agitation, aggression, or financial desperation, and to engage in compassionate and structured conversations with players who may be struggling. Additionally, employees are instructed on how to apply appropriate Responsible Gaming (RG) tools and refer users promptly to relevant support services. It is essential that staff understand their legal obligations under the relevant laws and regulations, including the LOK and CGA. To maintain a high standard of readiness, this training should be refreshed at regular intervals, with all attendance properly documented. Our customer-facing and VIP support teams receive specialized, structured training that emphasizes identifying vulnerable users, managing at-risk interactions sensitively, and guiding users towards responsible gaming resources and support services.

- Referring users to support tools or services.

14. Marketing and Advertising

The Company should ensure that all marketing and advertising activities are conducted responsibly, adhering closely to the following principles:

- **No Targeting of Vulnerable Groups:** Marketing materials, including visual content, should not directly target vulnerable individuals, including minors or those identified as vulnerable to gambling-related harm.
- **No Portrayal of Gambling as a Financial Solution:** Advertising should never suggest that gambling is a way to achieve financial success or resolve financial difficulties. Gambling should not be depicted as an investment or a reliable source of income.

- **No Misrepresentation of Skill vs. Chance:** Marketing should not imply that skill can influence the outcome of games that are based purely on chance. This distinction should be clear and transparent.
- **No Emotional Manipulation:** Advertisements should not portray gambling as a substitute for financial, emotional, or mental well-being. Gambling should never be suggested as a solution to personal problems.
- **No Use of Minors:** Marketing materials should not feature minors or depict them engaging with gambling content in any form.
- **No Explicit Content:** Advertisements, messaging, and communications should be free from overt sexual or pornographic imagery or suggestions.
- **No Encouragement of Harmful Behaviours:** Gambling should not be linked to smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness in any marketing materials.
- **Bonus and Promotion Transparency:**
 - All bonuses and promotions should be communicated clearly, with transparent and easily understandable terms and conditions.
 - Bonuses should not be used as tools to encourage excessive or irresponsible gambling behavior.
- **Third-Party Involvement:**
 - The Company is responsible for all marketing materials provided to affiliates, representatives, sponsors, brand ambassadors, social media influencers, or any third parties involved in advertising, including the wording and visual representations used.
 - The Company should ensure that all contracted third parties are fully informed about the Company's Responsible Gaming policies and are encouraged to comply with them strictly.
- **Responsible Gaming Messaging:** All marketing and advertising materials should prominently display a clear and visible responsible gaming message or slogan to promote awareness and encourage safe gambling practices.

15. Enhanced Measures

The Company may implement enhanced responsible gambling measures as necessary, depending on the inherent risk level of its business model or based on observed player behavior. Such elevated risk could stem from the business type itself or from a disproportionately high number of players assessed to be vulnerable, either through operator-led checks or through the frequency of players choosing to self-exclude or activate cooling-off periods.

To assist in preventing underage gambling and support vulnerable players, the Company encourages the use of third-party internet filtering tools designed to block access to gambling websites. These tools include well-known options such as BetBlocker, Gamban, and GamBlock. The Company advises adult users to take precautions when sharing devices with minors, recommending the safeguarding of usernames, passwords, and payment details to avoid unintended access. Relevant information and direct links to these tools are made available prominently in the Responsible Gaming (RG) section of the website or application, helping players and their families easily access these resources.

When there are signs of risky or potentially harmful gambling behavior, the Company may deploy automatic or manual pop-up notifications to alert the player. These notifications contain links to the RG section and encourage players to utilize available tools such as deposit limits, time limits, loss limits, cooling-off periods, or self-exclusion options. Where a player's behavior reasonably indicates vulnerability, the Company is committed to initiating proactive and supportive contact. This outreach advises players to review the responsible gambling resources available and consider implementing additional protective measures. Players are also provided with contact details for trained Responsible Gambling professionals to seek further guidance.

In addition to deposit limits, the Company may offer other limit types tailored to the needs of the player base or market. These include loss limits, which restrict the total amount a player can lose over a defined period; time limits, which control the maximum duration of gambling sessions; and wager limits, which cap either the size of individual bets or the total amount wagered during a session. These additional controls are designed to be intuitive, easy to access, and fully configurable by the player, empowering them to manage their gambling activity responsibly.

To further assist players in maintaining awareness of their gambling habits, the Company may implement reality check features. These features typically involve displaying a real-time session timer continuously during gameplay, along with a real-time clock reflecting the player's local time zone. Players may also have the option to set customizable alerts that trigger at predetermined intervals—such as every 30 minutes of play. When a reality check alert activates, the game session is temporarily paused, and the player is presented with detailed information, including the duration of the current session, net winnings or losses to date, and options to either end or continue playing. Before resuming, the player is required to acknowledge and confirm that they have read the message. These customized alerts serve as important reminders to encourage informed decision-making and help prevent excessive gambling. The messages clearly communicate the length of time the player has been active as well as their financial outcome during that period.

Overall, the Company strives to ensure that these enhanced responsible gambling measures are fit-for-purpose and implemented without compromising the user experience. By providing a combination of practical tools, proactive support, and transparent communication, the Company aims to foster a safer gambling environment where players can enjoy their activities while staying in control.

16. Governance and Reporting

Our Responsible Gaming Officer oversees responsible gambling policy implementation and submits an annual report to management evaluating its effectiveness. All material changes are reported to the CGA.