

RESPONSIBLE GAMING POLICY

Inno Growth B.V.

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Signed and approved by:
Norine J.E.Clifton,
on behalf of Morganite Corporate Services B.V.,
director of Inno Growth B.V.

1. Introduction

This policy aligns with the requirements of the National Ordinance on Games of Chance (LOK) and the CGA's Responsible Gaming framework.

At Inno Growth B.V., registration number 166117, address: Abraham de Veerstraat 1, Curacao (hereinafter – “we” or “Company”), we are committed to providing for you (“you” means you as a player of our Domain) a safe, fair, and responsible gaming environment for all our players on it domain, namely casibra.com (hereinafter – “Domain”). The Company has an application (OGL/2024/807/0278) for a gaming license in progress with the Curaçao Gaming Authority. Until that process is concluded, based on a transitional arrangement outlined in the National Ordinance on Games of Chance (Landsverordening op de Kansspelen, P.B. 2024, no. 157), the Company is permitted to continue its operations under Certificate of Operation. We recognize our duty to promote responsible gaming practices and safeguard our customers from potential risks associated with gambling.

1.1. Commitment to Responsible Gaming

We acknowledge that gambling should be an enjoyable and controlled activity. Our responsible gaming framework is designed to help prevent problem gambling and provide players with the tools to make informed decisions about their gaming habits.

1.2. Age Verification and Underage Gambling Prevention

We strictly prohibit underage gambling. Our platform employs robust age verification measures to ensure that only individuals over the legal gambling age (18+) can access our services. Any accounts found to belong to minors will be immediately suspended.

1.3. Self-Exclusion and Account Limits

To support responsible gaming, we provide players with the option to set deposit limits. Additionally, players who feel they need a break from gambling can opt for temporary or permanent self-exclusion, cooling off period. These measures help ensure that gaming remains a recreational activity and not a compulsive behavior.

1.4. Identifying and Assisting Problem Gamblers

We are committed to identifying signs of problem gambling through customer behavior monitoring and analytics. Our support team is trained to assist players exhibiting signs of gambling addiction and can provide guidance on seeking professional help from organizations specializing in gambling addiction treatment.

1.5. Fair and Transparent Gaming

We ensure that all our gaming products operate fairly and transparently by utilizing certified Random Number Generators (RNGs) and regularly audited gaming software. Our terms and conditions are clearly stated to provide full transparency regarding our operations.

1.6. Data Protection and Privacy

Protecting customer data is a top priority. We comply with all applicable data protection laws and implement secure measures to safeguard personal and financial information.

1.7. Encouraging Responsible Play

Our customer support team is available 24/7 to assist with any responsible gaming concerns.

1.8. Legal and Regulatory Compliance

As a Curaçao-licensed operator, we adhere to all regulations set forth by the Curaçao Gaming Authority (CGA). We continuously monitor and update our policies, including responsible gaming policy, to ensure compliance with industry best practices.

2. Age Verification

To prevent underage gambling, we have strict age verification procedures:

- A player must be at least 18 years old to register or play. We verify that the player is not a minor through date of birth confirmation. For this purpose, we request the player to provide us with government-issued valid identification document such as a passport, national ID card, driver's license. We also reserve a right to request the player to provide us with other documents in order to verify his/her age, such as selfie, proof of address, and employ third-party database checks.
- If the verification process determines that a player is underage or the we have a reason to suspect the player is underage, then we have a right close player's account. Excepting any funds frozen in accordance with the AML policy any funds deposited by a minor will be returned, and any winnings will be forfeited.
- We keep a record of all age verification attempts and their outcomes. It is necessary for regulatory purposes.
- In order to further prevent underage gambling, we remind adults that you should take precautions when sharing devices with your minors - such as safeguarding usernames, passwords, and payment details. Below you may consider links to third-party software that can help restrict access to gambling websites:
 - a) Net Nanny – www.netnanny.com
 - b) GamBlock – www.gamblock.com
 - c) CyberSitter – www.cybersitter.com

3. Self-Assessment

You are encouraged to regularly assess your gaming habits to determine whether you gambling remains within healthy limits by providing self-assessment tools that allow you to answer a series of questions designed to help identify potential problem gambling behaviors. These tools empower you to make informed decisions about their gambling activity.

One commonly used test is available from Gamblers Anonymous – it is a 20-question quiz that is published on its website. <https://gamblersanonymous.org/20-questions/>

Additionally, you can use the CAGE Questionnaire (Adapted for Gambling).

Players are encouraged to answer the following questions honestly:

- I. **C – Cut Down:** Have you ever felt you should cut down on your gambling?
- II. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
- III. **G – Guilty:** Have you ever felt guilty about your gambling?
- IV. **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 for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.
- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

If you recognize problematic gambling behavior through self-assessment tools, you are encouraged to use responsible gaming tools (such as cooling period, self-exclusion etc).

4. Behavior Tracking

We actively monitor your gaming activity to detect signs of problematic gambling using both manual oversight and automated tracking systems. Our approach includes:

- **Deposit and wagering patterns:** Identifying sudden spikes in deposits or erratic betting behavior.
- **Gaming session duration:** Flagging prolonged, uninterrupted gaming sessions without breaks.
- **Withdrawal reversals:** Detecting repeated cancellations of withdrawal requests, which may indicate problematic gambling behavior.
- **Use of multiple payment methods:** Monitoring changes in payment sources, especially if used to bypass limits.
- **Frequent changes to gaming limits:** Observing players who continuously adjust deposit.
- **Repeated use of responsible gaming tools:** Tracking excessive use of cooling-off periods or self-exclusions.
- **Player communication and support requests:** Identifying players frequently contacting customer support with concerns related to financial issues, bonus requests, or gaming distress.
- **Young players (under 25) with high spending:** Applying additional scrutiny to younger players engaging in significant wagering activity.

The list above is not exhaustive. We reserve a right to monitor other factors in you gaming behavior in order to comply with regulatory legislation.

When signs of problematic gambling are detected based on assessed player profile, our support team will take measures, including:

- Sending to you responsible gaming messages, recommendations, responsible gaming tools, including deposit limits, time-outs, and self-exclusion.
- Encouraging the use of deposit and session limits.

- Restricting account activity, applying deposit limits, if necessary.
- Referring players to external gambling support organizations.

5. Training

To maintain high responsible gaming standards, we provide comprehensive training to all individuals associated with our platform:

Employee Training:

- All customer-facing employees, including customer support, VIP managers, and responsible gaming officers, must complete responsible gaming training.
- Training includes recognizing gambling addiction signs, handling self-exclusion requests, and interacting sensitively with at-risk players.
- Employees undergo refresher courses annually to stay updated on new policies and best practices.

Affiliate & Marketing Partner Training:

- All affiliates must complete responsible gaming training before promoting our platform.
- Affiliates are required to follow strict guidelines regarding responsible gaming messaging, avoiding misleading claims, and ensuring that content does not target minors or vulnerable players.
- Regular compliance audits are conducted, and violations result in contract termination.

Social Media Influencer Training:

- Influencers must be educated on responsible gaming principles and must not promote gambling to minors or vulnerable individuals.
- All influencer content must include responsible gaming disclaimers and avoid portraying gambling as a financial solution or an emotional escape.
- The operator reserves the right to terminate partnerships with influencers who violate responsible gaming standards.

6. Cooling-Off

Cooling-off – is a period in time when the player is temporary restricted from gambling. We offer our players an option to activate a 24-hour, a 7-day, 1 month or 3 months cooling-off period, during which they are temporarily restricted from gambling on our Domain.

The key difference between **Cooling-Off** and **Self-Exclusion** lies in the **duration** and **restrictions applied**:

1. Cooling-Off Period

- **Short-term break** (e.g., 24 hours, 7 days, 1 month, or 3 months).
- The player temporarily **restricts access** to gambling but can resume automatically once the period ends.

- Intended for players who want a brief pause to control their gambling behavior.
- Does not affect the player's account permanently - no need for manual reactivation.

2. Self-Exclusion

- **Long-term or permanent restriction** (e.g., 1 year, 3 years, 5 years, 10 years, or lifetime).
- The player is **completely blocked** from gambling for the chosen period.
- Account remains locked, and reactivation requires formal **written consent** after the exclusion period ends.
- Used by players facing serious gambling problems or addiction.

Currently, we are developing and implementing technical adjustments on our platform in order to provide our players with the possibility to activate cooling off period by themselves without our involvement. We will update this policy respectively when the cooling-off feature will be available on our Domain.

Until that time, we provide this service manually.

In order to activate the cooling-off period please send us an email. Please note that such email shall:

- be sent from the email that was indicated by you during the account registration to our contact email rg@casibra.com;
- contain a respective cooling-off period request with an indication of the term of cooling-off period - 24-hour, a 7-day, 1 month or 3 months;
- indicate if you want us to opt-you-out of the marketing database during your cooling-off period.

Once we receive the above-mentioned email from you on cooling-off period request, we will execute your request immediately. Your account will be locked preventing any participation in gambling activities for the full period selected by you.

After the cooling-off period has expired, your account will be automatically reactivated, allowing you to resume gameplay without needing further action.

7. Self-Exclusion

At any time you have a right to self-exclude yourself from gaming.

Currently, we are developing and implementing technical adjustments on our platform in order to provide our players with the possibility to initiate and complete the self-exclusion process fully online, without any communication with us. We will update this policy respectively when such feature will be available on our Domain.

Until that time, we provide this service manually: it is swift and simple procedure.

In order to self-exclude yourself from the gaming please send an email to rg@casibra.com from the email that was indicated during the account registration.

We offer our players long-term self-exclusion periods of 1 year, 3 years, 5 years, 10 years, and permanent exclusion. If you do not indicate the term of self-exclusion in your email, you will be excluded for 1 year.

Once you send us email on self-exclusion, your account will be deactivated immediately. Your decision of self-exclusion cannot be revoked by you before the exclusion period end.

As a result of your self-exclusion request:

- All your gambling-related transactions will be blocked immediately.
- Your account must be deactivated, preventing further play. You will be also excluded from all our Domain.
- We will permanently remove your data from all marketing and promotional lists during the your self-exclusion period.

Reactivation and Post-Exclusion Protocol

After the self-exclusion period ends, the you are required to confirm in writing that you want to active your account. In order to do so, please send us a respective email to rg@casibra.com.

Operator-Initiated Exclusion

We reserve a right to exclude you as a high-risk intervention measure if:

- You display problematic gambling behavior.
- You attempt or engage in criminal activities through our platform.

8. Limits

You can set a limit on the total amount you deposit over a defined period (weekly, or monthly). Once a deposit limit is reached, you are not able to deposit additional funds until the specified period resets

Any request to lower limit takes immediate effect, while increases require a seven-day waiting period.

In order to set a deposit limit or request to lower limit, please feel free to write us an email to support@casibra.com from the email that you indicated during account registration.

9. General responsible gaming principles regarding marketing and advertising

To ensure responsible gaming practices, our marketing and advertising materials adhere the following principles:

1. Truthfulness & Transparency:
 - a. Marketing materials will not mislead players about the nature of gambling or the likelihood of winning.
 - b. All promotions, bonuses, and wagering requirements will be clearly stated with full terms and conditions.
2. Avoiding High-Risk Audiences:
 - a. Advertisements will not target self-excluded players, player that took cooling-off period, individuals with known gambling issues, or minors.

3. Promoting Responsible Play:
 - a. All advertisements will include responsible gaming messages and links to support organizations.
 - b. Ad materials will not suggest gambling as a means of financial security or a solution to personal problems.
4. Restrictions on Incentives & Bonuses:
 - a. Bonuses will not encourage excessive or impulsive gambling.
 - b. We will not offer bonuses specifically targeted at players exhibiting risky gambling behavior.
5. Affiliate & Influencer Compliance:
 - a. Affiliates and social media influencers promoting the our platform will comply with responsible gaming guidelines.
 - b. Any non-compliance by affiliates or influencers will result in termination of agreements.