

Responsible Gaming Policy

POLIGON ENTERTAINMENT N.V.

Version control:

Version:	v1.0
Author:	POLIGON ENTERTAINMENT N.V. Compliance Department
Effective date:	20 th June 2025
Approved by:	Compliance department and Director
Next review:	at least once in the following 12 months after the Effective date.

Change Log:

Version	Description	Date	Notes
1.0.	Policy implementation	1 st July 2025	

Annual Effectiveness Report: The responsible gaming officer (or, until designated, the Compliance Officer) provides at least annual effectiveness reporting to management with recommendations; material policy changes are reported to the CGA.

Definitions:

“**CGA**” means Curacao Gaming Authority.

“**Cooling Off**” means a pre-determined period that can comprise hours, days or months which is set by the player during which time the player may not place any wagers whatsoever.

“**Gambling**” and “**Gaming**” are used with the same meaning in this Policy and shall mean any activity which is licensed and regulated by the CGA.

“**Games of Chance**” means any game in which one or more players, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and players’ insight or skill, with no possibility for players to significantly influence the outcome, including sports betting and poker.

“**LOK**” is the National Ordinance on Games of Chance law of Curacao.



“Marketing, promotion and advertising” refer to all resources, messages and media that promote the 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.

“Mandatory Requirements” are the basic elements of a Responsible Gaming policy that must be implemented by all operators. These elements must reflect the target markets and players of the operator.

“Minor” means any person under the age of 18.

“Operator” is a holder of a B2C license from the Curacao Gaming Authority (or holder of an Orange Digital Seal “Certificate of Operations”).

“Players” or “players” and **“Customers” or “customers”** are used with interchangeably in the Policy and shall mean any person under of a legal age who can lawfully participate in online games of chance.

“Self-exclusion” is an event where a player voluntarily bars themselves from all or certain online gamingrelated activities with a specific operator.

“Vulnerable Person” is defined in the Clause 1.1 (h) of the LOK as

1. Under eighteen years of age.
2. Has no, or insufficient, control over his or her gambling behaviour, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and, as a result, may cause harm to himself or herself or to other people.
3. Has been banned from playing any Game of Chance either by force or at his or her own request.
4. Has been declared bankrupt.

1. Purpose, scope and principles:

1.1. Purpose: to ensure gambling remains entertainment and to prevent/mitigate harm among at-risk and vulnerable persons, meeting or exceeding CGA responsible gaming requirements.

This Responsible Gaming Policy (**‘Policy’**) establishes the framework and practices by which Poligon Entertainment N.V. ensures compliance with the Curaçao Gaming Authority (CGA) regulatory standards, including the National Ordinance on Games of Chance (LOK), and promotes responsible entertainment.

Poligon Entertainment N.V. believes that 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. Poligon Entertainment N.V. appreciates that for a small number of people, gambling can have a negative impact on their life. As a result, Poligon Entertainment N.V. has developed this Policy.

Poligon Entertainment N.V. supports and promotes responsible gambling and also keeps abreast of the industry's efforts around problem gambling initiatives.

1.2. Scope: this Responsible Gaming Policy applies to all services and channels offered by Poligon Entertainment N.V. as lawfully operated under CGA license: OGL/2024/815/0653

All problem gambling material and content is available in English or the applicable language for the market.

1.3. Principles incorporated in this Policy:

- No credit for wagering.
- Prevent underage gambling.
- Protect vulnerable persons.
- Promote transparency and informed decision-making.
- Do not knowingly permit self-excluded persons.
- Intervene promptly when indicators of problem gambling arise.
- Provide accessible tools, clear information, proactive monitoring, and appropriate interventions.

2. Governance and oversight:

The executive management of Poligon Entertainment N.V. are ultimately responsible for implementing and maintaining an effective Responsible Gambling framework.

The Responsible Gaming Officer (RGO) shall be appointed to oversee all responsible gaming obligations and ensures implementation, Management information/Key Performance Indicators, training, vendor/affiliate controls; prepares annual report; ensures CGA submissions.

3. Player Protection and age verification:

Poligon Entertainment N.V. strictly prohibits underage gambling. Verification of player age and identity is mandatory prior to the first withdrawal or upon meeting certain KYC thresholds. Minors must not register or gamble. The account must be closed immediately if a minor is identified, and all deposits will be returned to the customer regardless of win



or loss, and any profit will be confiscated; consider civil law implications (for example: refund deposits; forfeit winnings as applicable under law) and clearly communicate reasons. The customer is allowed to create a new account with correct identity data after becoming of legal age.

Scenarios of underage gambling with Minors is any situation which:

- (a) an underage person had been able to unimpededly access a betting facility.
- (b) a customer account or card was registered to the identity of an underage person.
- (c) the owner of a customer account or card alleges that the account or card was used by an underage person.
- (d) ID verification processes indicate the account owner to be underage.

4. Responsible gaming tools:

Poligon Entertainment N.V. provides players with access to multiple tools, including deposit limits, session limits, cooling-off periods, and self-exclusion options, all accessible via the player account.

4.1. Age Verification Controls (KYC thresholds and on 1st withdrawal):

- Self-attestation with date of birth + age confirmation at registration and government-issued valid ID prior to first withdrawal and on specified thresholds.
- May employ electronic/third-party checks, payment validations, selfie liveness, government database checks without superseding the government-ID requirement.
- Maintain records for regulatory review.

4.2. Parental Controls/Filtering: Provide links (for example to BetBlocker, GamBlock, Gamban) and advice to safeguard credentials/payment details from Minors.

Some tips for protecting Minors are:

- Keep your username, password and deposit details out of reach.
- Don't save passwords or use autofill on your computer.
- Install website blocking software such as NetNanny, GamBlock and CyberPatrol.
- Educate your children about the legality and potential damage.

5. Behaviour Monitoring & Interventions

Automated systems may be integrated that continuously monitor player behavior to detect potential problem gambling patterns. Indicators such as increased deposits, extended play sessions, and reversed withdrawals trigger review by the RGO.

6. Problem Gambling

Poligon Entertainment N.V. shall make readily available to players, means by which to help them determine whether they have a gambling problem or not. In addition to this, Poligon Entertainment N.V. shall endeavour to offer its services online with the “responsible gaming” messaging including:

- i) the information that gaming can be harmful if it is not controlled and
- ii) information about the player support measures on the website.

For the avoidance of doubt, gambling may have become a problem if the players find they are:

- Spending more money and time on gambling than intended.
- Starting to lie about player’s gambling habits and hiding them from other people.
- Borrowing money to pay for general living expenses: e.g. utility bills, basic groceries.
- Losing interest in any activity other than gambling.
- Finding player’s work or home life is being affected.
- Feeling unable to take breaks when gambling for prolonged period.
- Neglecting player’s own welfare and that of the player’s family.

7. Player Information and accessibility:

7.1. Responsible Gaming section available at the website(s) operated by Poligon Entertainment N.V. ∴ Prominently accessible; plain language; includes direct access to tools (self-exclusion, cooling-off, limit setting) and contact details (email/chat). Available in English and target market language (English prevails in discrepancies).

7.2. Homepage: Clear visible link to Responsible Gaming section + contact options.

7.3. Terms & Conditions: explicitly reference the Responsible Gaming section; one click from homepage; inform players about tools, functions, and usage.

7.4. Footer:

- 18+ / Minors prohibited” visual.
- Licensee’s registered name & address.
- CGA license number.
- Statement on CGA regulatory oversight.
- Link to Responsible Gaming section.
- CGA digital seal.

- Links to international/local support (for example GamCare, Gamblers Anonymous, GambleAware, and local resources where available).

8. Player self-assessment:

Poligon Entertainment N.V. offers self-assessment in the Responsible gaming section which contains 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. **Poligon Entertainment N.V.** provides a clear guidance on interpreting results.

DO YOU HAVE A GAMBLING PROBLEM?

Undertake the following self-assessment to ascertain if you may have a gambling problem. If you answered “yes” to seven or more of these questions you may have a gambling problem.

Have you ever lost time from work due to gambling?

Has gambling ever made your home life unhappy?

Has gambling affected your reputation?

Have you ever felt remorse after gambling?

Have you ever gambled to get money to pay debts or solve financial difficulties?

Has gambling ever caused a decrease in your ambition or efficiency?

After losing, do you feel you must return as soon as possible to win back your losses?

After winning, do you have a strong urge to return and win more?

Do you often gamble until you run out of money?

Have you ever borrowed money to finance your gambling?

Have you ever sold anything to finance your gambling?

Are you reluctant to use “gambling money” for normal expenditures?

Does gambling make you careless of the welfare of yourself and your family?

Do you ever gamble longer than planned?

Have you ever gambled to escape worry or trouble?

Have you ever committed or considered committing an illegal act to finance gambling?

Has gambling ever caused you to have difficulty sleeping?

Do arguments, disappointments or frustrations create within you an urge to gamble?

Do you ever get the urge to celebrate any good fortune with a few hours of gambling?

Have you ever considered self-destruction as a result of your gambling?

9. Time-out and self-exclusion:

9.1. Time-out: Poligon Entertainment N.V. offers to activated players, temporary restriction on gambling with configurable options:

Duration: 24h, 7d, 1m, 3m.

Verticals: All, or specific vertical.

Brand coverage: Current brand or all operator brands/domains.

Marketing: Opt-out option.

Player must tick-box select preferences; tick-boxes must not be pre-checked.

Enforce immediately as Poligon Entertainment N.V. does not question the decision or offer incentives. Poligon Entertainment N.V. keeps withdrawals accessible; Poligon Entertainment N.V. disables gambling features; Poligon Entertainment N.V. does not conduct any marketing if the player opted-out. During this time-out, the customer will have their account closed (with no option to reactivate) and all marketing material stopped. The account is automatically reopened at the expiration of the chosen time-out period.

Customers can find details of the time-out facility through the Responsible Gaming section at the website(s) operated by Poligon Entertainment N.V. If Poligon Entertainment N.V. cannot, for any reason, comply with a request to apply a limit when the request is received, the Company must notify the player that this is so, and at the same time inform the player when the limit will take effect.

9.2. Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. Poligon Entertainment N.V. 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.

An exclusion may only be implemented:

a) Upon the request of the player, for example by contacting customer services, or

by entering an automated process using remote communication and, or;

b) By Poligon Entertainment N.V. if there are sufficient reasons to indicate that the player may have problems with gambling issues.

Poligon Entertainment N.V. shall make readily available to players, at all times, a procedure whereby a player may exclude himself from playing for a definite or indefinite period of time.

Excluded player accounts are not subject to an inactivity fee.

Any person, wishing to self-exclude from Poligon Entertainment N.V. services, can obtain information from Poligon Entertainment N.V. by contacting its customer support team by:

- Live chat after log-in;
- Customer Support email – support@superbetin.com

Any attempt to open a new account, will be blocked or closed as duplicate accounts are detected.

Poligon Entertainment N.V. facilitates the following self-exclusion options:

- A. Temporary self-exclusion:** allows the customer to close their account for a minimum period as per the selected option. While their account is closed, they will not receive marketing or promotional emails and any attempt to open a new account will also be blocked or closed as duplicate accounts are detected. Accounts are automatically reopened upon the expiration of the self-exclusion period. The customer is free to determine the length of this period.
- B. Permanent self-exclusion:** as for a permanent account closure, the account is closed and automatic reactivation is not possible. Any attempt to open a new account will also be blocked or closed. The customer will also be removed from all marketing and promotion email lists.

If the customer has funds in their account, they can request withdrawal prior to applying the exclusion.

Upon receipt of a request to self-exclude via these methods, the customer support of Poligon Entertainment N.V. must verify their identity by asking a random combination of security questions such as:

- Date of birth
- Telephone number
- First line of address

The customer must then advise what type of exclusion they would like to pick.

Once the chat or phone session has ended, the customer support of Poligon Entertainment N.V. will place a note on the account to explain they were contacted by the customer to self-exclude. The above self-exclusion stages then apply.



When a customer opts to self-exclude permanently, they have the option to revoke or decrease it. However, in order to do so, Poligon Entertainment N.V. needs an official request sent via the registered e-mail address. During a temporary self-exclusion, the customer may contact the customer support of Poligon Entertainment N.V. to increase the period as this shall be applied immediately.

Operator-Initiated exclusion: Poligon Entertainment N.V. may exclude a player as a high-risk intervention if: problematic behaviour, criminal activity through the website(s) operated by Poligon Entertainment N.V. ; not based solely on winning amounts.

10. Deposit limits:

For customers who wish to control the amount of money they are gambling Poligon Entertainment N.V. offers the opportunity to set a deposit limit. Customers can set a limit by contacting customer support via live chat or email. Limits can be set for the following time periods:

- Daily
- Weekly
- Monthly

Customers are able to find details of the deposit limit facility through the Responsible Gaming section at the website(s) operated by Poligon Entertainment N.V.

Customers are able to reduce their deposit limit by live chat and email. Reductions in deposit limits are undertaken immediately. Customers are also able to increase their deposit limit via live chat and email however, increases are subject to a 24-hour cooling off period.

11. Staff Training

All customer-facing employees receive mandatory training in responsible gambling awareness and intervention techniques. Refresher training is conducted annually or upon major regulatory changes.

12. Marketing & Advertising Compliance

All marketing materials must include responsible gambling messaging, avoid targeting Minors or vulnerable persons, and comply with CGA advertising guidelines.

Poligon Entertainment N.V. responsible for third-party materials; require contractual adherence to this Policy.

13. Data Privacy & Recordkeeping

All responsible gambling data shall be stored in compliance with data protection laws. Poligon Entertainment N.V. maintains records of all interventions and player exclusions for at least five years. Persons, who are not account owners, can have legitimate requests regarding responsible gaming. As long as their request do not refer to confidential



information (like customer data), Poligon Entertainment N.V. provides the required information similar to:

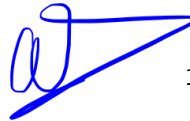
- expressed interest in Responsible Gaming or player protection measures.
- expressed attitudes or behaviours that are linked with increased risk of developing gambling disorders.

However, at no point shall third parties be informed about any customer data without proper validation and documentation being submitted, for example: Power of Attorney/Guardianship. No changes to a customer account (like exclusion) may be made based on requests from unauthorised third parties, even if they bring forward relevant reasons (for example: proof that the customer is a disordered gambler). However, relevant information brought forward by third parties triggers a case investigation by Poligon Entertainment N.V.

Approved by: Andrea Maria Enghardt,

Title: Managing Director of eMagnus Curacao B.V

Date: 20.06.2025



10/30/2025

