

RESPONSIBLE GAMBLING POLICY

for

CLUBHOUSE MEDIA N.V.

VERSION CONTROL

Title	Responsible Gambling Policy		
Description	How CHM protects players from gambling-related harm on xolotto.com — the tools available to players, how CHM monitors for harm and intervenes, and the records CHM keeps.		
Date Created	2019		
Operative Date	August 2026		
Maintained By	Clubhouse Media		
Version Number	Modifications Made	Date Modified	Status
1.0	Original policy — initial release	2019	Superseded
2.0	Draft redraft written against the CGA's February 2025 consultation draft. Never adopted and never in force.	Dec-2025	Superseded
3.0	Full redraft against the CGA Responsible Gaming Policy for Licensed Operators v1.0 (April 2025). Restructured into seventeen numbered sections with sub-clauses. Adds definitions, accountability and the responsible gaming role, prevention of underage gambling, player information and accessibility, self-assessment and access to play history, behaviour monitoring and intervention, cooling off, self-exclusion, operator-initiated exclusion, deposit limits, training, advertising and marketing, enhanced measures, and records, retention and reporting.	Aug-2026	Operative

Table of Contents

1 · Purpose, scope and application	3
2 · Definitions	3
3 · Accountability	3
4 · CHM's business model	4
5 · Prevention of underage gambling	4
6 · Player information and accessibility	5
7 · Access to play history and self-assessment	5
7.1 Play history	5
7.2 Self-assessment	5
8 · Behaviour tracking and intervention	6
8.1 How CHM monitors	6
8.2 What CHM looks for	6
8.3 Recording	6
8.4 Intervention	6
9 · Cooling off	7
9.1 Duration	7
9.2 Selection	7
9.3 Effect	7
9.4 Changes	7
9.5 Reactivation	7
9.6 Route to self-exclusion	7
10 · Self-exclusion	8
10.1 Duration	8
10.2 Scope	8
10.3 Selection	8
10.4 Effect	8
10.5 Preventing circumvention	8
10.6 Reactivation	8
11 · Operator-initiated exclusion	8
12 · Deposit limits	9
12.1 Setting a limit	9
12.2 Changing a limit	9
12.3 Wagers already placed	9
13 · Training and staff readiness	9
14 · Advertising and marketing	9
14.1 Advertising standards	9
14.2 Bonuses and promotions	9
14.3 Marketing during cooling off and self-exclusion	10
14.4 Third parties	10
15 · Enhanced responsible gambling measures	10
15.1 Reality check	10
15.2 Internet filtering tools	10
15.3 Direct player interaction	10
15.4 Other limits	10
16 · Records, retention and reporting	10
16.1 Records	10
16.2 Retention	10
16.3 Reporting	10
17 · Review of this Policy	11

1 · Purpose, scope and application

This Policy sets out how **Clubhouse Media N.V. ("CHM")** protects players from gambling-related harm on xolotto.com, in alignment with the Curaçao Gaming Authority's *Responsible Gaming Policy for Licensed Operators* and the **National Ordinance on Games of Chance** (*Landsverordening op de kansspelen*, "LOK").

Adherence is a requirement under the LOK. Failure to comply is addressed by the Curaçao Gaming Authority ("CGA") through its monitoring and enforcement procedures.

This Policy applies to every player of xolotto.com, in each language in which CHM offers its services. CHM operates one brand and one approved domain.

CHM is responsible for executing this Policy, under the supervision of the CHM Compliance Officer.

This Policy does not apply to non-retail gaming and betting, including professional players and syndicates.

2 · Definitions

CGA — the Curaçao Gaming Authority.

LOK — the National Ordinance on Games of Chance of Curaçao.

CHM Personnel — the individuals who carry out CHM's operations, whether engaged directly by CHM or through CHM's service providers.

Minor — any person under the age of 18.

Vulnerable Person — as defined at LOK clause 1.1(h): a person under eighteen years of age; a person who has no, or insufficient, control over their gambling behaviour, because of which they are, or threaten to become, addicted to one or more games of chance and, as a result, may cause harm to themselves or to other people; a person who has been banned from playing any game of chance either by force or at their own request; or a person who has been declared bankrupt.

Cooling Off — a short-term, temporary restriction from gambling activities, set by the player, during which the player may not place any wagers.

Self-Exclusion — a long-term, irrevocable exclusion from all gambling activities under CHM's licence.

RG Section — the distinct Responsible Gambling section of the CHM website, carrying CHM's responsible gambling information and direct access to the tools described in this Policy.

Player account record — the record CHM maintains against each player account, which is the player account management system referred to by the CGA.

3 · Accountability

The CHM Compliance Officer holds the responsible gaming role, and is responsible for implementing and enforcing this Policy until such time as CHM appoints a person dedicated to responsible gaming. The Compliance Officer is not CHM's AML/CFT officer; the AML/CFT role is held separately, and the two roles are not performed by the same person or the same provider.

The holder of the responsible gaming role reports to CHM's management team at least once every twelve months on the effectiveness of this Policy and its related operational procedures, and makes recommendations for any proposed operational or policy enhancement. That period runs from the date this Policy takes effect.

Any material change to this Policy is reported to the CGA.

CHM's management team is made aware of this Policy and of its implementation.

CHM's obligations under this Policy apply however CHM's operations are delivered. Where CHM engages a service provider, CHM remains responsible for the performance of those obligations as if CHM had performed them directly.

Every member of CHM Personnel whose work brings them into contact with players is required to act on indications that a player may be experiencing gambling-related harm, and to bring them to the responsible gaming role holder.

4 · CHM's business model

CHM offers online games of chance to players in the markets it serves, through a single brand and a single approved domain.

CHM operates no VIP programme, no player tiering and no dedicated account management, and does not market to or solicit high-value players. CHM offers no skin betting and operates no agent or intermediary accounts. The same responsible gambling tools and the same protections are available to every player.

Cryptocurrency is one of several payment methods CHM accepts, and accounts for a minority of deposits. CHM's responsible gambling controls operate at account level, not at payment level: deposit limits are enforced by the CHM platform whatever method a player uses to fund the account, and cooling off, self-exclusion and behaviour monitoring act on the account itself. The controls in this Policy therefore apply identically however a player funds their account. Requirements relating to the source of funds and to identity verification are addressed in CHM's AML and Know Your Customer policies.

5 · Prevention of underage gambling

No person under the age of 18 may gamble with CHM. Where a jurisdiction in which CHM offers its services requires a higher minimum age, that higher age applies to players in that jurisdiction. The minimum age applying to a player is published on the CHM website and in the CHM Terms and Conditions.

At registration, CHM requires the player to enter their date of birth and to confirm that they meet the minimum age applying to them by selecting a designated checkbox.

CHM may require a player to complete identity verification at any point where CHM considers it necessary, including where a player's behaviour or transaction history gives cause. In any case, identity verification including a government-issued identity document must be completed before a first withdrawal, and on reaching the thresholds set out in CHM's Know Your Customer and AML policies. Secondary verification methods do not displace that requirement.

If CHM becomes aware that a player is a minor, the account is closed immediately. CHM communicates the reason for the closure to the player. Consistent with the applicable civil law, deposits made by the player are refunded and any winnings are forfeited.

Where CHM becomes aware that a player does not meet a higher minimum age applying in their jurisdiction, the account is closed. Such a player is not a minor, so the treatment of their deposits and winnings is governed by the CHM Terms and Conditions rather than by this Policy.

CHM maintains records of all age verification processes and their outcomes, and makes them available for regulatory review.

6 · Player information and accessibility

CHM maintains a distinct RG Section, available to players at all times. The RG Section is clearly identifiable and accessible, carries information a player can understand well enough to make an informed choice, and includes direct access to each of the tools described in this Policy — cooling off, self-exclusion, deposit limits, session reminders and self-assessment.

A clear and visible link to the RG Section appears on the CHM homepage.

The RG Section explains how a player may contact CHM about any responsible gambling concern, by email.

The RG Section is available in English and in the language of each market CHM serves. Where versions differ, the English version takes precedence.

The RG Section is referenced in the CHM Terms and Conditions, which are no more than one click from the homepage, and which inform players of the responsible gambling tools available, what each does, and how to use them.

The footer of the CHM website carries: a clear visual indication that under-age gambling is prohibited; CHM's registered name and address; CHM's official CGA licence number; a statement that CHM's operations are subject to the regulatory oversight of the Curaçao Gaming Authority; CHM's CGA digital seal; a link to the RG Section; and direct links to gambling support resources.

7 · Access to play history and self-assessment

7.1 Play history

A player may access a detailed record of their own betting and wagering history, including transaction timestamps, from their player account. CHM does not restrict that record to a fixed period, which exceeds the minimum of six months the CGA requires. A player may also request a record from CHM directly, which CHM supplies within 10 working days.

7.2 Self-assessment

CHM provides a self-assessment tool in the RG Section, so that a player may consider whether their gambling remains within healthy limits. The tool is the CAGE questionnaire adapted for gambling, presented with its scoring key, alongside a link to the 20-question quiz published by Gamblers Anonymous.

A player's answers are not recorded. The self-assessment runs in the player's browser and nothing is written to the player account.

CHM recommends that any player who recognises problematic gambling behaviour through self-assessment explores the responsible gambling tools available to them, and the result of the self-assessment links the player directly to those tools.

8 · Behaviour tracking and intervention

CHM monitors player behaviour for indications of gambling-related harm, using a risk-based approach proportionate to CHM's player base and risk profile. Monitoring assesses a player's activity against that player's own established pattern of play rather than against a fixed threshold, so that a material change is visible whatever a player's usual level of spend.

8.1 How CHM monitors

- Frontline observation, continuously — CHM's customer service team observes player activity and direct player interactions for indications of harm.
- Immediately, on a signal — CHM reviews a player's account without waiting for a scheduled review where an automated payment-risk control fires against that player, where CHM identifies that a player may hold more than one account, where a player repeatedly changes their responsible gambling settings, or where a customer service contact is escalated.
- Periodically, and at least monthly — CHM carries out a documented review of payment and account data for indications of harm.

Enhancements to CHM's monitoring are considered through the review described at Section 17.

8.2 What CHM looks for

CHM maintains a written reference list of indicators for the use of CHM Personnel in customer-facing roles, covering at least:

- sudden or unexplained increases in deposit and wagering frequency, or changes in gaming session patterns;
- repeated failed transactions due to insufficient funds;
- repeated cancellation of withdrawal requests;
- a pattern of inexplicable extended play sessions;
- unreasonably increased contact with customer support, including requests for bonuses reflecting signs of agitation;
- frequent changes to responsible gambling tools, including repeated use of cooling off;
- indications that a player is exhausting the limits of a payment method;
- attempts to open multiple accounts to bypass limits.

No single indicator classifies a player as at risk. A determination of problematic gambling behaviour may require several indicators occurring together and consistently.

8.3 Recording

Every responsible gambling interaction, whether initiated by the player or by CHM, is recorded on the player account record, together with the indicators of concern and the action taken. Where an indication of harm arises in a customer service conversation, it is recorded on the player account record.

8.4 Intervention

A player identified as exhibiting at-risk behaviour is informed of the responsible gambling tools available, including deposit limits, cooling off and self-exclusion.

Where escalation is appropriate, CHM follows a clear protocol, which may include applying a deposit limit to the player's account, temporarily suspending the account pending further assessment, or permanently excluding the player in cases of severe or persistent risk.

CHM does not use responsible gambling measures as a pretext to prevent or delay a legitimate withdrawal.

9 · Cooling off

A player may set a cooling-off period at any time from the RG Section.

9.1 Duration

The player selects one of: 24 hours, 7 days, 1 month, 3 months. A month means a calendar month, ending at the same time of day one or three months later; where that day does not exist in the target month, the period ends on the last day of that month.

9.2 Selection

The player makes an explicit choice with no period pre-selected, and can initiate and complete the whole process online, without email communication or CHM's approval. A neutral confirmation is shown before the period begins.

CHM does not question the player's decision, offer any bonus or promotion to encourage continued play, or delay or complicate activation.

9.3 Effect

Restrictions take effect immediately. During a cooling-off period:

- the player may not place any wager on any product or game CHM offers, and cannot access CHM's games from their account;
- deposits are blocked;
- no bonus, free play or incentive is available to the player, whether by link, by code or through the promotions engine, and none is granted or accrued;
- the player's marketing opt-out is applied automatically;
- the player remains able to log in, to see their account, and to withdraw their funds without needing to contact CHM;
- the account is not closed.

9.4 Changes

A player may make a running cooling-off period more restrictive. A cooling-off period cannot be shortened or cancelled by the player, and CHM holds no power to shorten or cancel it on the player's behalf.

9.5 Reactivation

Reactivation is automatic at the end of the period, with no action required by the player and none taken by CHM. CHM sends no communication inviting the player to resume play.

9.6 Route to self-exclusion

CHM informs players of the differences between cooling off and self-exclusion and offers a direct route to self-exclusion for a player who self-identifies as vulnerable. Neither option is presented as preferable to the other.

10 · Self-exclusion

A player may self-exclude at any time from the RG Section.

10.1 Duration

The player selects one of: 1 year, 3 years, 5 years, 10 years, or lifetime. A year means a calendar year.

10.2 Scope

Self-exclusion applies to all gambling activity under CHM's licence. Marketing opt-out is automatic. The player selects only the duration.

10.3 Selection

The player can initiate and complete the whole process online, without email communication or CHM's approval. A single neutral confirmation is shown before the exclusion begins. CHM does not question the player's decision, offer any bonus or promotion to encourage continued play, or delay or complicate activation.

10.4 Effect

Restrictions take effect immediately. The account is closed and the player can no longer log in. A self-exclusion is irreversible and irrevocable for the duration selected.

No direct marketing or advertising is sent to a self-excluded player.

10.5 Preventing circumvention

CHM maintains measures, so far as reasonably possible, to identify duplicate accounts and to prevent a self-excluded person opening a new account under different credentials. Registration requires a verified mobile number, and CHM matches new registrations against existing accounts.

10.6 Reactivation

After the exclusion period ends, the account remains closed until the player requests in writing, by email, that it be unblocked. That request may be prompted when the player attempts to log in after the period has ended, or made by the player unprompted. Reactivation is never instigated by CHM re-commencing communication with the player. A lifetime exclusion does not expire.

CHM records each reactivation against the player account, including the date the written request was received, who actioned it, and when the account was reopened. Repeated cycles of self-exclusion and reactivation are treated as an indicator of risk.

11 · Operator-initiated exclusion

CHM may exclude a player as a high-risk intervention where the player displays problematic gambling behaviour, or attempts or engages in criminal activity through the CHM platform.

CHM does not exclude a player solely on the basis of the amount of their winnings.

Operator-initiated exclusions are formally documented, and records are kept for at least five years. The CGA may request these records at any time.

12 · Deposit limits

12.1 Setting a limit

A player may set a limit on the total amount they deposit over a defined period. Daily, weekly and monthly periods are available.

Once a deposit limit is reached, the player cannot deposit further funds until the period resets.

12.2 Changing a limit

A change that makes a deposit limit more restrictive takes effect immediately. A change that relaxes a limit, including removing it, takes effect after 24 hours, and the player's previous limit continues to apply until then.

12.3 Wagers already placed

Deposit limits apply to the deposit action. Wagers placed before a limit was set are unaffected by it, whether resolved or unresolved.

13 · Training and staff readiness

CHM Personnel in customer-facing roles are equipped to handle player interactions professionally, covering at least: recognising signs of gambling distress; conducting sensitive and structured conversations with at-risk players; and directing players to appropriate support resources and to the responsible gambling tools described in this Policy.

CHM provides them with continuing guidance, feedback on player interactions, and updates as responsible gambling tools change.

14 · Advertising and marketing

14.1 Advertising standards

CHM does not engage in irresponsible advertising. CHM's marketing, promotion and advertising:

- does not target Vulnerable Persons, and does not feature minors or depict them engaging with gambling content;
- does not present gambling as a way to achieve financial success or resolve financial difficulty;
- does not suggest that skill can influence the outcome of a game determined by chance;
- does not present gambling as a substitute for financial, emotional or mental wellbeing;
- contains no overtly sexual content, and draws no link between gambling and smoking, drug use, alcohol or attractiveness;
- carries a clearly visible responsible gambling message.

14.2 Bonuses and promotions

Bonuses and promotions are communicated transparently, with clear terms and conditions, and are not used to encourage excessive gambling.

14.3 Marketing during cooling off and self-exclusion

No marketing is sent to a player during a cooling-off period or a self-exclusion.

14.4 Third parties

CHM is responsible for the material it provides to affiliates, representatives, sponsorships, ambassadors and social media influencers where their actions or statements are paid placement or advertisement. CHM makes each contracted third party aware of this Policy and requires adherence to it.

15 · Enhanced responsible gambling measures

15.1 Reality check

CHM displays a real-time clock in the player's local time while casino games are in play, and allows a player to set pop-up reminders after a chosen period of play.

15.2 Internet filtering tools

CHM advises adults sharing a device with a minor to safeguard their username, password and payment details, and provides links to third-party software that can restrict access to gambling websites — BetBlocker, GamBlock and Gamban.

15.3 Direct player interaction

Where a player's behaviour reasonably suggests they may be a Vulnerable Person, CHM contacts the player directly and advises them to review the RG Section and to consider the tools and support available.

15.4 Other limits

CHM keeps under review, through the process described at Section 17, whether further limits are appropriate to its player base.

16 · Records, retention and reporting

16.1 Records

CHM maintains records of age verification processes and their outcomes; of every responsible gambling interaction, with the indicators of concern and actions taken, on the player account record; and of every self-exclusion.

16.2 Retention

CHM retains these records in accordance with the retention periods applicable to them. Records of operator-initiated exclusions are retained for at least five years. The CGA may request access to CHM's responsible gambling records at any time.

16.3 Reporting

CHM reports serious responsible gambling failures to the CGA without undue delay and in accordance with any applicable reporting requirement. Any material change to this Policy is reported to the CGA.

17 · Review of this Policy

CHM reviews the effectiveness of this Policy and its supporting controls at least every twelve months. The review assesses whether CHM's monitoring, tools and procedures remain proportionate to its risk profile and player base, and recommends enhancements — including additional reporting and technology-assisted detection where these would improve player protection.

This Policy is also reviewed whenever the CGA's Responsible Gaming Policy changes, or a material change is made to CHM's responsible gambling processes or tools.