

Responsible Gaming Policy Whitebox B.V.

Table of Contents

1. Introduction and Policy Statement.....	3
2. Responsible Gambling.....	3
2.1 Contacting the Company Regarding Responsible Gaming Concerns.....	4
3. Problem Gambling.....	4
4. Age verification.....	4
5. Information Visibility.....	5
6. Behavior tracking.....	5
6.1 Player Profiling and Risk-Based Approach.....	5
6.2 Responsible Gaming intervention.....	6
6.3 Responsible Gaming Record Keeping	6
7. Self- Exclusion.....	6
8. Time-Out/ Cooling off periods.....	7
9. Deposit Limits.....	7
10. Reality Checks.....	8
11. Player Protection Measures.....	8
11.1 Independent Organizations.....	8
11.2 Problem Gambling Self-Assessment.....	9
11.3 Gambling History.....	9
11.4 Language.....	9
12. Bonus conditions.....	10
13. Internal evaluation.....	11
14. Training.....	11
Revision History.....	12

1. Introduction and Policy Statement

The Company believes in a responsible attitude towards gambling and has implemented measures detailed within this document to promote and ensure responsible gambling. The Company believes that the industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for those individuals requiring assistance.

For the majority of people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. The Company acknowledges that for some people, gambling can have a negative impact on their life and therefore the Company has developed this Responsible Gaming Procedure (hereafter: the 'Policy') which outlines certain practices adopted by us when providing services to our customers.

As part of The Company's problem gambling initiative all staff receive responsible gambling training as part of the induction process and annually thereafter.

The Company has appointed a designated Responsible Gaming person, who is responsible for implementing and enforcing the Policy. Furthermore, this designated person shall be the point of reference regarding this Policy and its related requirements.

2. Responsible Gambling

Responsible gambling involves the conduct of gambling in a manner where the potential for harm associated with gambling is reduced.

The Company respects the rights of our customers to enjoy our services and to take responsibility for their own conduct, but also acknowledges the duty to our customers to provide them with appropriate information that may assist them to manage their gambling.

The Company's aim is to ensure that customers make informed decisions about gambling and that if the customer requires assistance, to facilitate access to gambling help services.

The Responsible Gaming Policy for Licensed Operators as issued on April 17, 2025 by the Curacao Gaming Authority (hereafter: 'RG Policy CGA') sets out various obligations which must be adhered to. As part of the RG Policy CGA, the Company will prominently display:

- The license details through the dynamic seal on the page(s);
- A sign which indicates that under-age gaming is prohibited;
- A 'responsible gaming' message, explaining that gaming can be harmful if it is not controlled, and information about the player support measures;
- A direct link leading to the responsible gaming section which includes all relevant responsible gaming information required by the CGA;
- A direct link which enables players to refer to one or more gambling support organisations;

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

- Age Verification: Players must be at least 18 years old to participate in any gaming activities. Age verification is done during the account registration process;
- Self-Assessment Tools: We provide self-assessment tools to help players evaluate their gaming behavior and identify potential risks. These tools are accessible via our website;
- Behavior Tracking: Our system monitors player behavior to detect signs of problem gambling and intervene when necessary. This includes tracking deposit patterns, frequency of play, and time spent on gaming activities;
- Deposit Limits: Players can set daily, weekly, or monthly deposit limits to manage their spending;
- Cool-Off Periods and Self-Exclusion: Players can opt for temporary cool-off periods or self-exclusion to take a break from gaming. Self-exclusion can be set for periods ranging from six months to five years.

2.1 Contacting the Company Regarding Responsible Gaming Concerns

The Company provides Customers with several methods to seek assistance or raise concerns regarding Responsible Gaming matters.

Customers may contact the Company at any time through:

- Live Chat: Available 24/7 via our website
- Email Support team

All Responsible Gaming enquiries received through email, chat, or customer support channels shall be escalated to appropriately trained personnel for review and response.

Where a Customer expresses concerns regarding their gambling behaviour, requests information regarding Responsible Gaming tools, seeks assistance with limits, cooling-off periods or self-exclusion, or displays indicators of gambling-related harm, the interaction shall be recorded and reviewed in accordance with the Company's Responsible Gaming procedures.

Customers shall receive information regarding the Responsible Gaming tools available to them, including deposit limits, cooling-off periods, self-exclusion options, gambling history information, and independent support organizations.

3. Problem Gambling

Problem gambling occurs when there is a lack of control over gambling, particularly the scope and frequency of gambling and the amount of recreational time spent gambling.

The negative impacts may include:

- Extreme financial losses relative to their sources of income;
- Adverse personal effect on the customer, his or her family and friends;
- Adverse effect on employers and work performance.

The Company's aim is to achieve equilibrium in the provision of gambling services, taking into account those customers who enjoy our services and use them as a form of entertainment, the wellbeing of our customers who have an acknowledged gambling problem, their families and the community at large.

4. Age verification

The Company does not allow anyone under 18 years of age to play on their website(s). Age verification is conducted in accordance with the AML guidelines of the CGA. In the unlikely event that an underage player does manage to play, all deposits will be returned to the customer regardless of win or loss. The account will be closed immediately.

5. Information Visibility

The Company ensures that players can easily access responsible gaming information by:

- Visible Links: Our homepage displays a link to the responsible gaming policy, tools, and contacts. These links are also included in the footer of the homepage on our website;
- Terms and Conditions: Clear references to our terms and conditions, including the prohibition of underage gambling, are provided. The terms and conditions are easily accessible and written in plain language;
- Responsible Gaming Organizations: Links to organizations that offer support for gambling addiction are available. These include local and international organizations, as per this policy.

6. Behavior tracking

The Company monitors customer activity to identify potential gambling problems. Behaviour tracking will be done, amongst other elements, on the following factors:

- Deposit and wagering frequency;
- Repeated failed transactions due to insufficient funds;
- Reversing withdrawals;
- Inexplicable extended play sessions;
- Frequent changing to Responsible Gaming tools;
- Unreasonable increased communication with customer support;
- Attempts to open multiple accounts to bypass deposits or loss limits.

Behavior tracking will be conducted by the Company's frontline personnel (such as customer support and/or VIP manager) and if at gambling behaviour arise, this behaviour is flagged for further handling. In addition, the Company can use technological tools including AI (Artificial intelligence) or ML (Machine Learning) for the flagging of gambling problems.

6.1 Player Profiling and Risk-Based Approach

The Company adopts a Risk-Based Approach (RBA) to identify, assess, monitor, and manage gambling-related harm.

Each Customer shall be assigned a Responsible Gaming risk profile based on behavioural indicators and account activity. Risk assessments may consider factors including:

- Deposit frequency and value;
- Wagering frequency and intensity;
- Session duration;
- Repeated failed deposits;
- Reversal of withdrawals;
- Use of Responsible Gaming tools;
- Customer communications indicating distress;
- Attempts to circumvent Responsible Gaming controls;
- Any other indicators of gambling-related harm.

Customers shall be categorised into risk levels including Low Risk, Medium Risk, and High Risk.

The level of monitoring and intervention applied by the Company shall correspond to the Customer's assessed risk level.

Possible interventions may include:

Low Risk:

- Monitoring and educational messaging.

Medium Risk:

- Responsible Gaming communication;
- Encouragement to use Responsible Gaming tools;
- Review of account activity.

High Risk:

- Direct Responsible Gaming intervention;
- Mandatory limits;
- Temporary account restrictions;
- Company-initiated exclusion where necessary to protect the Customer.

Risk profiles shall be reviewed periodically and whenever new risk indicators are identified.

6.2 Responsible Gaming intervention

Customers identified as exhibiting at risk gambling behavior will be informed of the Responsible Gambling tools available. These tools are designed to combat at risk

gambling behavior. These RG tools can range from deposit limits, cooling off and, self-exclusion options.

The Company can also apply the following to the Customer's account if the at-risk gambling behavior persists:

- Applying mandatory deposit limit to the Customer's account;
- Temporarily suspend the Company's account pending further investigation for at-risk gambling behavior;
- Permanently exclude the Customer in case of severe or persistent risk.

6.3 Responsible Gaming Record Keeping

All Responsible Gaming related interactions, interventions, assessments, customer communications, cooling-off requests, self-exclusion requests, mandatory restrictions, and responsible gambling reviews shall be recorded within the Company's Player Account Management (PAM) system.

Records shall include, where applicable:

- Date and time of interaction;
- Customer identification details;
- Reason for the interaction or intervention;
- Risk indicators identified;
- Actions taken by the Company;
- Responsible Gaming tools applied;
- Follow-up actions and outcomes.

These records shall be maintained in accordance with applicable legal, regulatory, AML/CFT, data protection, and record-retention requirements.

7. Self- Exclusion

Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. The Company offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want our assistance to help them stop.

The self-exclusion request shall be applicable:

- A. To all brands/domains operated under the Company;
- B. All gambling activities related to one Casino vertical available on the Company's domain. If such option is provided by the Company to the Customer, as otherwise the self-exclusion under A will be provided for all gambling activities of the Company;
- C. All advertisement activities of the Company. An automatic opt-out will be triggered when selfexclusion is activated.

The duration of the self-exclusion period must be at least 1 year. The Customer shall be able to set the duration for 3 years, 5 years, 10 years or a lifetime.

The Customer should be able to set their preference of for the duration of the self-exclusion period online, without requiring email communication or prior approval from the Company. Once this is set, all exclusions related to brands/domains, vertical gambling activities and advertisement activities automatically applies immediately.

Any wagering that takes place following the self-exclusion request and prior to it being into effect will be voided and the funds returned to the Customer.

The Company should not question a Customer's decision regarding self-exclusion in general, not will the Company offer bonuses to the Customer to encourage participation, or delay/complicate the self-exclusion activation process.

If a self-exclusion is applied, the following actions should be in place:

- The Customer's account is closed. The Customer can no longer log in.
- The Customer must complete any tournaments that is in-running at the time of the selfexclusion.
- Ante-posts bets will be voided and refunded subject to AML/CFT regulations.
- Contributions to progressive jackpots that were made by the Customer through gameplay prior to the self-exclusion request remain, but the Customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect.
- No Advertisement activities shall be conducted towards the Customer.
- Any payment method used by the Customer will be blocked by the Company for future use during the term of the self-exclusion period.

The Company will implement measures to prevent self-excluded Customers from creating new Customer's account under different credentials.

The Company will retain records of self-excluded requests by Customers according to the applicable record keeping requirements.

7.1 Reactivation of customer's account after self-exclusion

After the self-exclusion period ends, the Customer must request in writing (by email or chat) the unblocking of the account. The reactivation of the account cannot be instigated by the Company by re-commencing communications with the Customer.

7.2 Company initiated self-exclusion

The Company may exclude a Customer from gaming activities as a high-risk intervention measure if:

- The Customer displays problematic (gaming) behaviour
- The Customer attempts or engages in criminal activities through the Company's platform.

The Company will not exclude Customers solely on the basis of the amount of their winnings.

8. Cooling off periods

The Company offers Customers the ability to activate a Cooling-Off Period as a temporary Responsible Gaming measure.

Cooling-Off requests may be initiated through the Customer account, live chat, email, or customer support channels.

The minimum Cooling-Off period available is 24 hours.

Customers shall be offered the following Cooling-Off options:

Mandatory options:

- Duration restriction;
- Marketing opt-out.

Additional options where technically available:

- Brand restriction;
- Vertical restriction (e.g., sportsbook, casino, poker);
- Other Responsible Gaming restrictions implemented by the Company.

Duration options shall include at least:

- 24 hours;
- 7 days;
- 1 month;
- 3 months.

The Customer's selected restrictions shall take effect immediately upon confirmation.

No marketing communications, bonuses, promotional offers, or advertising activities shall be directed toward Customers who have selected a marketing opt-out option.

Cooling-Off restrictions shall not affect a Customer's ability to withdraw available funds.

9. Deposit Limits

In-line with the RG Policy CGA, the Company will offer the opportunity to set limits. The player will have the possibility of setting Deposit Limits – Allows the player to limit the amount of money that can be deposited within a set timeframe; usually daily, weekly or monthly;

- Once a deposit limit is reached, the Customer will not be able to deposit more funds until the specified period for the limit resets;
- Any request to lower the deposit limit takes place immediately, while request to raise the limit are subjected to a 24-hour waiting period before implementation.
- Any resolved and unresolved wagers that the Customer made prior to the deposit limit being set in place remains unaffected regardless of the limit set.

10. Reality Checks

Players shall be able to receive and see on the screen a reality check within a gambling session. A reality check notifications offers the player the option to exit the gambling session e.g. log out. This will be further detailed in version 1.3 of this Policy as per the implementation schedule of the RG Policy CGA.

11. Player Protection Measures

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

11.1 Independent Organizations

The website of the Company will displays the direct links to:

<https://gamblingtherapy.org/information/where-can-i-get-help/>

and /or <https://www.gamcare.org.uk/self-help/links-to-other-support-agencies/international-support-contacts/>

and/or <https://www.gambleaware.org>

as well as to specific names of organizations offering treatment options in case these are available in the target market of the Company. These links will be readily available on the footer of the website.

11.2 Problem Gambling Self-Assessment

Customers are encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits The Responsible Gaming section on the website will contain information that any Customer can assess to help them identify any potential problem gambling behavior. The Responsible Gambling page shall contain a CAGE questionnaire (Adapted for Gambling) which Customers are encouraged to answer the following questions truthfully:

- C – Cut Down: Have you ever felt you should cut down on your gambling?
- A – Annoyed: Have people annoyed you by criticizing your gambling habits?
- G – Guilty: Have you ever felt guilty about your gambling?
- E – Eye-Opener: Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Result:

- 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.

The Company will recommend that any Customer who recognize problematic gambling behaviours through self-assessment should explore the available responsible gambling tools.

Alternatively, there is a commonly used test available from Gamblers Anonymous for the Customers to use – it is a 20-question quiz that can be accessed with the following link posted on the RG page: <https://gamblersanonymous.org/20-questions/>.

11.3 Gambling History

A registered participant's gambling history is available, including all deposits and withdrawals. This information allows a player to monitor their gambling spend. A full statement can be found within the players Account or can be requested by contacting the customer support team.

The Customer can request records of their gaming and wagering history. If the Customer requests records of their betting history longer than 6 months ago, then the company will aim to provide these records to the Customer within 10 working days or in line with the applicable data protection legislation, whichever is longest. However, the Customer must bear in mind possible (legal) limitations regarding record keeping and that not all records will always be available to the Company.

11.4 Language

All problem gambling material and content is available in English language only as well as the language of the target market(s). Procedures remain the same irrespective of language.

11.5 Duplicate Accounts

The company will take measures in order to prevent players from opening duplicate accounts on the Website, which measures will be further detailed in version 1.3 in accordance to the implementation schedule of the Responsible Gaming policy CGA.

11.6 Advertisement activities

The Company shall engage in responsible advertising. According to the LOK, The Company must ensure that:

- Marketing does not target vulnerable persons or vulnerable groups.
- Marketing does not portray gambling as an investment opportunity or a means of financial success.
- Marketing does not misrepresent games of chance as games of skill.
- Marketing does not use emotional manipulation, social pressure, or fear of missing out to encourage participation.
- Marketing materials does not contain explicit, offensive, or inappropriate content.
- Marketing does not encourage alcohol abuse, substance abuse, reckless behaviour, or any unrelated harmful behaviour.
- Marketing materials does not use minors, appear to target minors, or depict minors participating in gambling activities.

- All bonuses and promotions shall be communicated transparently and include all material terms and conditions.
- Bonuses shall not be structured or promoted in a manner that encourages excessive gambling.

All advertisements done by the Company or third parties hired by the Company will include a clearly visible Responsible Gaming message or slogan.

Advertisement activities may not be conducted by the Company if the players have opted out during their Cooling Off period if they have opted out. As such, no bonuses, free play, or incentives may be offered during this period.

12. Bonus conditions

As bonuses are regarded by the CGA as advertisement activities, they fall under responsible advertisement conditions under the LOK and the CGA RG Policy. Therefore, the Company will communicate to the Customer the terms and conditions of any bonus and/or promotion clearly. Furthermore, the Company is committed to not use any bonus to encourage excessive gaming.

12.1 Third party responsibility

The Company shall make any contracted third-party aware of their Responsible Gaming Policy and require them to adhere to it.

The Company is accountable for materials provided to affiliates, representatives, sponsorship, ambassadors social media influences, including wordings and visuals representations, in case these influencers actions and/ or statements pertain to paid placement of advertisements.

Any Customer who is currently under a period of self-exclusion (cooling off) or a permanent exclusion due to problem gambling, will be removed from all marketing correspondence lists.

No marketing or promotional materials is to be sent to excluded Customers.

13. Internal evaluation

The Company understands that evaluation of customer interactions is important to understand the impact they have had and to help ensure customers are getting the right help and support.

The findings of the customer interaction evaluations are to be reported to the management of the Company.

This Policy and the Company's approach to customer interaction can then be amended using the findings from the evaluation.

14. Training

Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to all staff. All staff are provided with induction training on responsible gambling and annually thereafter.

To ensure best practice, ad-hoc training may also be provided to employees to discuss findings following evaluations.

The trainings given will cover at least the following:

- Recognizing signs of gambling distress (e.g. Agitation, aggression, or financial desperation)
- Conducting sensitive and structured conversations with at risk Customers.

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Directing Customers to appropriate Responsible Gambling support resources.

Revision History

Version #	Effective Date	Approving Official	Responsible Office	Next Review Date	Comments
1.0	May 19, 2025	XCM B.V.	Compliance function	September 20, 2025	-
1.1	September 28, 2025	XCM B.V.	Compliance function	March 1, 2026	Minor formatting adaptations
1.2	March 30, 2026	XCM B.V.	Compliance function	September 30, 2026	-
1.3	June 25, 2026	XCM B.V.	Compliance function		-