

Responsible Gaming Policy

Peak Interactive N.V.

License# OGL/2024/860/0410

April - May 2025

1. 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.

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")

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

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

- Under eighteen (18) years of age.
- Has no, or insufficient, control over his or her gambling behavior, 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.
- Has been banned from playing any Game of Chance either by force or at his or her own request.
- Has been declared bankrupt.

Peak/Organization/Company/Our – Peak Interactive N.V., an online gambling company established in Curacao under registration number 10847 which is authorized under the laws of Curacao with pending license number OGL/2024/860/0410 to conduct gaming online. The company falls under the Curacao legislation LOK for implementation and execution of responsible Gaming Protocols, Rules and Regulations. The term “Peak/Company / Organization /Our” when used in these Policies also refers to the management bodies of the Organization and the members of such bodies as well as the employees of the Organization.

2. Peak Interactive Policy Overview

Peak Interactive N.V. is committed to fostering a safe, transparent, and fair gaming environment in conjunction with the CGA. This Responsible Gaming policy is a requirement under the LOK, and the Company will make every effort to adhere to and comply with such requirements and guidelines under the provisions posted by the CGA on or about April 17, 2025. The Company will execute all requirements on or before each deadline stated by the CGA through September 2026. As such:

Measure	Section	End Apr-25	End May-25	End Sep-25	End Mar-26	End Sep-26
Marketing & advertising cannot knowingly and deliberately target vulnerable persons	12	✓				
Terms & Conditions should be visible and clear	6.3		✓			
Responsible gambling policy: The document must be submitted to the CGA	2		✓			
Management team to be aware of RG policy and its implementation	2		✓			
Designate suitably qualified Responsible Gaming tasks to a person within the operator's online business	2		✓			
Information Accessibility: Prominent display of information regarding responsible gambling and gambling addiction in English, as well as the language of the target market, including information on the website that gambling is prohibited for minors (under 18 years old)	6		✓			
Gambling support referral: A prominent display of gambling treatment options in the target market, including local and/or international problem gambling support websites	6		✓			
Marketing & promotions (other than vulnerable persons)	12			✓		
Age verification: prohibition of gambling by self-excluded individuals and minors on the website	5.1 5.2			✓		
Self-exclusion option must be functional and meet all requirements (offering at least 1-year Self-exclusion period to players)	9.2			✓	★	
No credit offering for wagering	2.1			✓		
RG message on all advertising (mandatory)	12			✓		
Behaviour tracking and procedures for player identification and interventions must be functional	8			✓	★	
Safer gambling tools. Deposit limits	10.1			✓	★	
RG training of staff with customer interaction (i.e. Customer support and VIP at a minimum and marketing)	11			✓	X	
Cooling-off option must be available to players	9.1			✓	X	
Player self-assessments must be available to players	7			✓	X	
Exclusion by the operator must be functional	9.2					X
Other RG tools as necessary based on risk profile: for example, Reality Check, time limit.	13					X



= Active



= Pending (Specific Automation or documented policy)

As of April 2025, and May 2025, the Company has fully complied with the following:

- Upload the Company Responsible Gaming policy to the CGA portal for CGA evaluation.
- Marketing & advertising cannot knowingly and deliberately target vulnerable people
- Marketing & promotions (other than vulnerable persons)
- Age verification: prohibition of gambling by self-excluded individuals and minors on the website
- Terms & Conditions are visible and clear. Also include RG information and links
- No Credit Wagering is permitted (per Company's AML policy)
- The management team made aware of RG policy and its implementation
- Employees have been trained on RG
- Designated suitably qualified Responsible Gaming tasks to an employee
- Information Accessibility: Prominent display of information regarding responsible gambling and gambling addiction in English, as well as the language of the target market, including information on the website that gambling is prohibited for minors (under 18 years old)
- Gambling support referral: A prominent display of gambling treatment options in the target market, including local and/or international problem gambling support websites
- No Under 18's messaging and age verification
- Prohibition of gambling by self-excluded individuals and minors on the website

2.1 Recipients of this Policy

This Policy document has been submitted to the following:

- Curacao Gaming Authority
- Peak Interactive Management Group
- Peak Interactive Directors
- Peak Interactive Customer Service, VIP and CRM personnel

3. Mandatory Requirements

The following Responsible Gaming elements are deemed mandatory for operational compliance with the CGA gaming license:

1. Age verification (Section 5) - Active
2. Information accessibility (Section 6) - Active
3. Player self-assessments (Section 7) - Active
4. Behavior tracking (Section 8) – Active/Pending
5. Cooling-off Periods (Section 9.1) – Active / Pending
6. Self-exclusion (Section 9.2) – Active / Pending
7. Deposit limits (Section 10.1) - Active / Pending
8. Training of employees (Section 11)- Active
9. Consumer Advertising and Marketing (Section 12) -Active

4. Responsible Gaming role

CGA policy requires that the Company appoint someone which fulfils the Responsible Gaming role in the organization. - **Active**

This person is: Matthew Kelemen, CEO of Peak Interactive (interim through 2026)

At least once every twelve (12) months, the stated person above shall report in writing to the Board of Directors of the Company as to the effectiveness of the policy and related operational procedure. This report shall provide recommendations to the Board (and other management as applicable) as to any proposed operational or policy enhancements. Any material changes to the Responsible Gaming policy shall be reported to the CGA. A copy of such report would be available to the CGA.

5 Prevention of under 18 gambling - Active

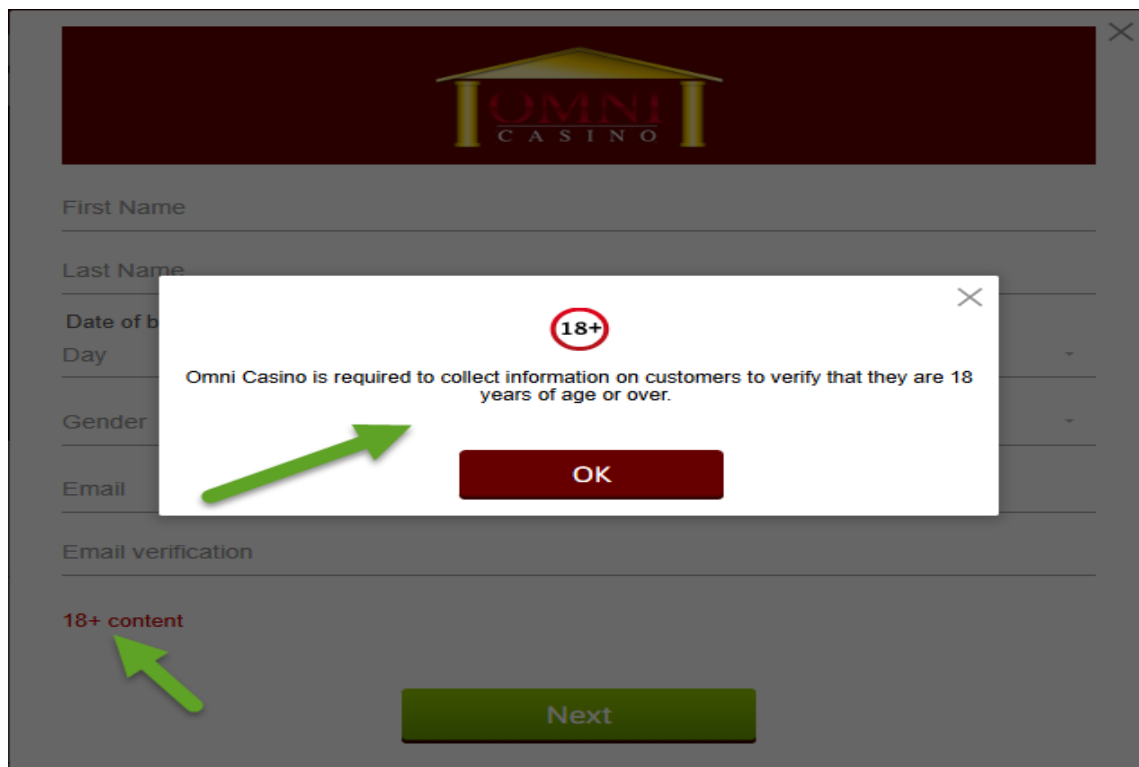
5.1 Age verification

According to Article 1.4(d) of the LOK, it is prohibited for the Company to allow a minor (under 18) the opportunity to participate in games of chance. The Company has long enforced such a policy. The company enacts the following:

- Per the Company's AML policy document (submitted to CGA April 2025), during standard first line AML and KYC procedures, a government-issued valid ID check (such as a passport, national ID, or driver's license) on reaching specified AML/KYC thresholds and/or in any case prior to first withdrawal verifying that person account details are the same as the individual presenting the identity information to ensure that the date of birth matches and is under 18.
- Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification, may be undertaken by the Company at its own discretion, but do not supersede the government-issued document requirement.

During the account registration process, self-attestation is sought where the player is required to enter their date of birth and confirm they are 18+ by selecting a designated

Registration Form (Prior to data entry)



The screenshot shows the Omni Casino registration form. At the top is the Omni Casino logo. Below it are input fields for First Name, Last Name, Date of birth (Day, Month, Year), Gender, Email, and Email verification. A white pop-up window is centered over the form, featuring a red circle with '18+' inside. The text in the pop-up reads: 'Omni Casino is required to collect information on customers to verify that they are 18 years of age or over.' Below this text is a red 'OK' button. A green arrow points from the '18+' icon to the 'OK' button. Another green arrow points from the '18+ content' text at the bottom left of the form to the 'Next' button at the bottom center. The 'Next' button is a green rectangle with the word 'Next' in white text.

- checkbox.

Dedicated checkbox to attest over 18+



OMR08717112

.....

Confirm password

CAD

Promo Code (optional)

☐ I am 18+ and I accept [Terms & Conditions](#)

☒ I would like to receive great bonuses and exciting offers

Back

Join now

- If at any point, notwithstanding the checks put in place, should the Company become aware that the player is a minor, our policy is that the account must be closed immediately. Under such situations, further verification and investigations will be conducted that may include the obligation to refund all deposits made by the player and the forfeiture (and/or recovery) of any winnings.

- Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification, may be undertaken by the operator at its own discretion, but do not supersede the government-issued document requirement.
- The Company shall maintain records of all age verification processes and their outcomes. These records must be made available for regulatory review.

6. Player Information and Accessibility - Active

6.1 Responsible Gaming Section

<https://www.omnicasino.com/about/responsible-gambling>

The company has multiple manners to reach and read about problem gambling which are clearly identifiable and accessible that contained information in plain and understandable English for the user. The company provides:

- All relevant information a player may use to manage their gaming behavior including, but not limited to, self-exclusion, cooling-off period, limit setting and other Responsible Gaming measures. **Active**
- Displays information about how the player may contact the Company regarding any Responsible Gaming concerns via email or chat. **Active**
- The RG Section is English and supports our target market(s) **Active**
- Problem Gambling Questions **Active**
- Under 18 information **Active**
- Third party help resources **Active**

6.2 Homepage Accessibility - Active

Per the CGA, a clear and visible link to the RG Section is present on the website and mobile homepage. The Company displays information about how the player may contact the Company regarding any Responsible Gaming concerns via email or chat.

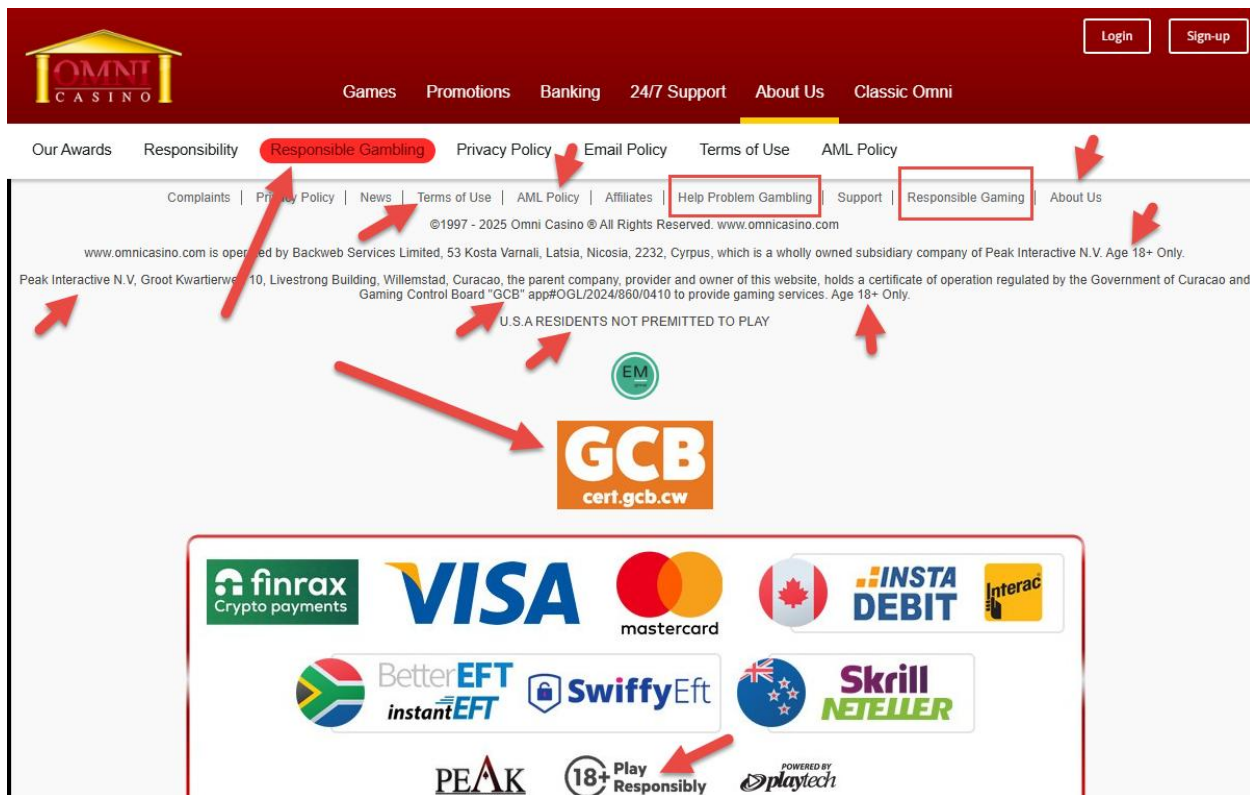
6.3 Terms & Conditions Inclusion – **Active**

- The RG Section is explicitly referenced and included within the Terms & Conditions (**Section 13**) of the website. - **Active**
- The Terms and Conditions must be no more than one click away from the homepage of the website. - **Active**
- Players must be informed about the Responsible Gaming tools available, their functionality, and how they can be used. - **Active**

6.4 Footer Information Requirements

The Company's footer contains the following essential details:

- A clear visual indication that under-age gambling is prohibited. - **Active**
- The name and registered address of the license holder. - **Active**
- The official license number issued by the Curacao Gaming Authority. - **Active**
- A statement confirming the regulatory oversight of the Licensee's operations by the Curacao Gaming Authority. - **Active**
- A link to the RG Section - **Active**
- The operators CGA digital seal. - **Active**
- A direct link to <https://responsiblegambling.org>. In addition to international support resources, information and links to local support sites (where available in the target market) can also be provided. - **Active**



7. Player Data for Self-Assessment - Active

In accordance with industry-wide practices and in conjunction with the CGA guidelines, the Company provides the following data and information for players to form a Self-Assessment. Players may also at any time request their information directly to the Company in accordance with the 2018 EU General Protection Data Regulations.

<https://www.omnicasino.com/about/privacy-policy>

Players are able access a detailed record of their betting and wagering history including time stamps of transactions from their player account of at least the last six (6) months.

Active

OMNI CASINO

Games Promotions Banking 24/7 Support About Us Contact Us

Deposit Add a Visa / Master Card Quick Deposit Transaction History Withdraw Pending Withdrawals

Transaction Period

Export

All

2025-05-15 15:47 Accrue loyalty points \$ 1.00

2025-05-15 15:47 Casino game win \$ 150.00

2025-05-15 15:47 Casino game bet \$ 10.00

2025-05-15 15:47 Accrue loyalty points \$ 1.00

Transaction Period

Last 24 hours

Last 24 hours

Last week

Last month

Last 3 months

Another Period

- Longer periods may be requested from the Company and are to be provided within 10 working days. (If such a request is not feasible, the Company will contact the player and notify (if applicable), the CGA to seek an extension period) **Active**
- Players are encouraged to assess their gaming habits to determine whether their gambling remains within healthy limits by providing self-assessment tools that allow them to answer a series of questions designed to help identify potential problem gambling. **Active**

<https://www.omnicasino.com/about/responsible-gambling>

8 Behavior Tracking – Active & Pending

Active monitoring detects signs of problematic gambling and clear intervention strategies for high-risk players in order to mitigate harm. Article 1.4(e) of the LOK prohibits the Company to give a person who can reasonably be assumed to be a vulnerable person the opportunity to play games of chance.

In this respect, the company regularly reviews ALL customer gaming transactions, total wagers, total deposits and number of days played in a period of time to spot any irregularities that may present possible gaming problems. – **Active**

The industry and the CGA acknowledge, a determination of problematic gambling behavior may require the presence of multiple indicators occurring simultaneously and consistently.

– **Active**

Nonetheless, the Company deploys its best efforts on an on-going basis to analyze the player's relationship with us so that we can identify at-risk individuals and take proactive steps to prevent gambling-related harm. – **Active**



In this respect, the company routine monitoring includes, but is not limited to: – **Active**

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals – players cancelling withdrawal requests multiple times.
- Patterns of inexplicable extended play sessions.
- Unreasonably increased communication with customer support – including requests for bonuses reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools requests – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period.
- Attempts to open multiple accounts to bypass deposit or loss limits.

However, one suggested guidance by the CGA is to monitor a “player maxing out a credit card.” Be it known to the CGA, this is impossible to obtain such information from a player as it is private and privileged information belonging to the card holder.

8.2 Procedures for Player Identification and Intervention— **Active & Pending 2026**

Per the CGA, Operators must have a “*structured and documented*” process for responding to identified indicators of problem gambling. The company is currently completing this documentation for the CGA and it shall be submitted prior to the deadline stated. **Pending**

This process will include the following components:

8.2.1 Player Profiling and Risk Assessment

Operators must establish and maintain player profiles incorporating relevant data points to assess individual risk levels. – **Active**

• Bigbadbear78 - bjorn [logout](#)

PLAYER INFO 2.0 | PLAYER ACTIVITY TIMELINE | Sign-up date: 2025-05-15 23:36

Internal account:	☐	Frozen:	☒ Reason: Gambling Problem
Anonymous Account:	☐	Referer:	-
Credit limit:	€0.00	Dormant:	☐
Temp approve next deposit:	Click to select	Merchant group used for CC deposits:	Default
Ignore Default account limiting check:	☐		
Product Gaming Blocks:	☐ Bingo ☐ Poker ☐ Sportsbook ☐ Casino		
	☐ Web ☐ Retail Terminal ☐ Retail Over The Counter ☐ Retail ATM ☐ Download ☐ Mobile		
Platform Gaming Blocks:	☐ Retail Bet In Play ☐ Retail App ☐ Telebet ☐ SMS Betting ☐ Flash ☐ Interactive Voice Response		
	☐ On Course		
Poker frozen:	Not frozen	Poker blocked:	Not blocked
Has copy of ID:	☐	Related Accounts:	omnicasino: OMR91757542 , C303811780 , OMR18066122 (Parent), This account
Has copy of POA:	☐	Has additional documents:	☐
Casino VIP level:	3	Casino VIP level change date:	-
Player risk profile:	High risk	Player risk profile change date:	2025-05-15 23:36:06
Player risk profile change reason:	Gambling Problem		

A risk-based approach must be adopted to determine the appropriate level of monitoring and intervention.

All Responsible Gaming interactions—whether initiated by the player or the operator—must be recorded in the Player Account Management (PAM) system, along with the indicators of concern and any actions taken. – **Active**

Bigbadbear78 - bjorn

PLAYER INFO 2.0 PLAYER ACTIVITY TIMELINE

Correspondences

DATE & TIME	CREATED BY	TYPE	USER MOOD	CONTENT	TOPIC	SUBTOPIC
2025-05-16 21:26:06	ChantelD	E-mail	Calm	Question	Account Closed	Gambling Problem
2025-05-16 19:26:50	MatthewK	Account	Other	Other	Account frozen	-
2025-05-16 19:26:50	MatthewK	Other	Other	Other	Account: freeze	-

60 days Last 30 SHOW MORE ADD NEW CORRESPONDENCE Extended search

8.2.2 Responsible Gaming Interventions – Active

Players identified as exhibiting at-risk behavior must be informed of the Responsible Gaming tools available, such as deposit limits, cooling off, and self-exclusion options.

Operators must follow a clear escalation protocol where appropriate, which may include:

- Applying mandatory deposit limits to the player’s account.
- Temporarily suspending the account pending further assessment.
- Permanently excluding the player in cases of severe or persistent risk.
- Under no circumstances may an operator use Responsible Gaming measures as a pretext to prevent or delay legitimate player withdrawals. Any misuse of protective interventions for financial gain will be considered a breach of license conditions.

10. Cooling off and Self-Exclusion - Active - Pending

The Company has implemented and maintains effective processes and tools that empower the player to manage their own gambling behavior. However, full automation is pending. Two key mechanisms that will be made available to players at all times via the RG Section of the website or app:

- Cooling Off: A short-term, temporary restriction from gambling activities, which the player can customize. – **Pending Self Automation**
- Self-Exclusion: A long-term, irrevocable exclusion from all gambling activities under the operator's licence. - **Pending Self Automation**
- Players must not be guided or influenced toward one option over another. No interference, bonuses, or reassurances may be provided.
- Players will be clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable. Cooling Off
- Self-Exclusion

Wagering Prohibited	Player selection – all or by vertical.	No wagering, all verticals blocked
Deposits	No	No
Withdrawals	Yes	Depends on civil law
Log-in	Yes	No
Brands	Current brand or All operator brands – as selected	All brands/domains under the operator's license
Duration	Min 24 hours	Min 1 year
Changes	Can be made more restrictive	None

- Duration
- Brand: (includes both the primary and any mirror domains of that brand)
- Vertical
- Marketing Opt-Out

- Duration Only: Restriction on all wagering activity for the period selected on the brand where the restriction was initiated.
- Duration, Vertical and Brand: Restrictions as selected, on brands selected, on verticals selected.

9.1 Cooling Off – Active - Pending

9.1.1 Overview

The Company offer players the option for cooling-off period by email or live chat, during which they are temporarily restricted from gambling activity. Full automation is pending and when completed will present:

- The Duration and Marketing Opt-Out categories are mandatory. Inclusion of the Brand and Vertical categories are at the discretion of the operator.
- The player will select (by tick-box) their preference in each of these categories. Tick-boxes will not be pre-checked.

9.1.2 Duration Options

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

9.1.3 Vertical Options

- ALL gambling activity
- Restriction will be across ALL games

9.1.4 Brand Options

- The current brand (website and/or app)
- All of the operator's brand

9.1.5 Marketing

- Opt-out is set automatically upon Cool Off or Self Exclude

Bigbadbear78 - bjorn.reinholdtsen

PLAYER INFO 2.0 | PLAYER ACTIVITY TIMELINE | Sign-up date: 2025-0

PLAYER INFO	TRANSACTIONS	WALLET TRANSACTIONS	NON-APPROVED WD	CASINO GAME SESSIONS	CORRESPONDENCES	SENT MESSAGES	CHAT HISTORY
PLAYER TAGS	PAYMENT METHODS	CREDIT CARDS	LOGINS	FRAUD	BONUS COUPONS	PENDING BONUSES	NON IMS BONUSES
ACCEPTED T&C	MOBILE	SELF EXCLUSION	PLAYER ACCOUNT HISTORY	BALANCES	BALANCE HISTORY	TRANSACTION WALKWAYS	GAME TRANSACTIONS
YEARLY STATEMENTS	DEPOSIT LIMITS	AUTHENTICATION PHONES	ALLOWED PMS	CASINO GAME STATES	BROKEN GAMES	PLAYER CLUSTERS	CONTACT PREFERENCES
LOYALTY POINTS	PLAYER BALANCE SHEET	TIME-OUT					

Contact Preferences

Message Type	Email	SMS	Direct Mail	Voice	Mobile Push	Inbox	Other
Promotional Messages	Block	Block	Block	Block	Block	Block	Block
Non-promotional Messages	Default(All...)	Default(All...)	Default(All...)	Default(All...)	Default(All...)	Default(All...)	Default(All...)

9.1.6 Actions and Implementation

9.1.6.1 Timing

The restrictions take effect immediately and be enforced according to the player's selections.

The Company will not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The Company may incorporate a verification check for the elected periods of 1 or 3 months for the player to confirm the decision to take a break from gambling during the selected cool-off period, but such checks should be online only and neutrally expressed e.g. "You wish to cool off for one month. Please confirm".

9.1.6.2 Player Account

- Player funds remain accessible for withdrawal.
- Account remains active but with gambling features disabled.

9.1.6.3 Marketing and Communications

- Marketing materials will not be sent to players during their Cooling Off period if they have opted out.
- No bonuses, free play, or incentives will be offered during the cooling-off period.

9.1.7 Reactivation and Post-Cooling Off Protocol

- Accounts must be automatically reactivated after the selected Cooling Off period expires.

No further action is required by the player. Duration: In accordance with LOK clause 5.4(2) the Company will offer a long-term self-exclusion periods of at least 1 year.

Brand: All brands/domains operated under Peak Interactive N.V.

Vertical: All gambling activity

Marketing: Automatic opt-out

9.2 Self-Exclusion **Active - Pending**

9.2.1 Overview

The Company offer players the option to self-exclude by email or live chat, during which they are restricted from gambling activity. Full automation is pending and when completed will present:

The player must select (by tick-box) their preference as to the duration of the self-exclusion period, all the other elements are automatic.

With regard to the self-exclusion process(s) offered by the Company, at the very least the player must be able to initiate and complete the self-exclusion process fully online, without requiring email communication or operator approval. **Active – Pending (automation)**

9.2.2 Duration Options

- 1 year
- 3 years

- 5 years
- 10 years
- Lifetime.

9.2.3 Actions and Implementation

9.2.3.1 Timing

The restrictions will take effect immediately and be enforced according to the player's selections.

The civil law implications must be considered and may entail that any wagering that takes place following the self-exclusion request and prior to it being in effect must be voided and funds must be returned to the player.

The Company will not:

- Question the player's decision.
- Offer bonuses or promotions to encourage the player to continue playing.
- Delay or complicate the activation process.

The operator may implement one simple verification check to ensure that the player is aware they have chosen to self-exclude and understands the consequences of this decision. The verification should be conducted online, and be brief and straightforward. The wording should be neutral, for example: "You have chosen to self-exclude for 5 years. Please confirm".

Player Account

- Account is closed. Player can no longer log-in.
- The Company does have robust measures in place to identify where reasonably possible duplicate accounts exist and prevent self-excluded individuals from creating new

accounts under different credentials. However, this is not fail-proof, and all reasonable efforts are made to block duplicate accounts.

- Contributions to progressive jackpots that were made by the player through gameplay prior to the self-exclusion request remain in-situ, but the player is no longer entitled to participate with the jackpot after the self-exclusion is in effect.

9.2.3.2 Marketing and Communications

- No direct marketing or advertising will be sent to the player.

9.2.4 Reactivation and Post-Cooling Off Protocol

- After the self-exclusion period ends, the player must request in writing (by email or chat) the unblocking of the account. The written request can be prompted at the point of the player attempting to log in after the exclusion period has ended or by unprompted written communication by the player via the official customer support channels.
- **Reactivation will not be instigated by the operator re-commencing communications with the player. Activation of a self-exclusion by a player is irreversible and irrevocable for the duration of the exclusion period selected.**
- The Company will retain records of self-excluded in accordance with the applicable retention periods. Additionally, where possible, and in line with surrounding regulations, any payment
- Excluded players will be blocked for future use during any exclusion period to prevent circumvention of restrictions.

9.3 Operator-Initiated Exclusion - **Active**

The Company may exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behaviour.
- The player attempts or engages in criminal activities through the platform.

- The Company retains all rights to accept or deny a patron for whatever reason it determines but will not exclude players solely on the basis of the amount of their winnings.

Company-initiated exclusions are formally documented, and records are kept for at least five years. It is noted that the CGA may request these records at any time.

10 . Limits **Active - Pending**

The Company offer players deposit limits by email or live chat. Full automation is pending.

Players today can set limits for daily, weekly, or monthly periods, allowing them to tailor restrictions to their individual gaming habits.

10.1 Deposit Limits **Active - Pending**

Players can request/set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).

- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets. **Active**
- If the option to change limits exists while a limit is already in place, any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.

Active

^ Deposit Limits

ACTIVE DEPOSIT LIMITS								
PERIOD	LIMIT	START DATE ⓘ	PERIOD START DATE	RESET DATE	REMAINING LIMIT	NEW PERIOD	NEW LIMIT	
No limit	-				-	No limit No limit Day Week Month		

ADD

GENERAL

LIMIT SETTINGS HISTORY

LIMIT USAGE

Start date
2025-03-19
End date
2025-05-20
Limit periods
Click to select

SHOW HISTORY

- Any resolved or unresolved wagers made prior to the deposit limit being set in place remains unaffected regardless of the limits set.

Exceptions to Limits and Exclusions

A limit or exclusion has the potential to affect active wagering – including, but not limited to:

- A time limit set when a player is active in a poker tournament.
- A limit or exclusion when a player has an unresolved ante-poste bet on a future event.

The Company does not offer Poker

11 Training and Staff Readiness -- Active

The Company's staff has an average of 15 years of service, and each has been trained extensively over their years of service. All staff handle player interactions professionally and effectively.

Training has covered:

- Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation).
- Conducting sensitive and structured conversations with at-risk players.
- Directing players to appropriate support resources and Responsible Gaming tools.

12 Consumer Advertising and Marketing - Active

The Company always promotes responsibly and does not engage in irresponsible advertising. Marketing guidelines are available here:

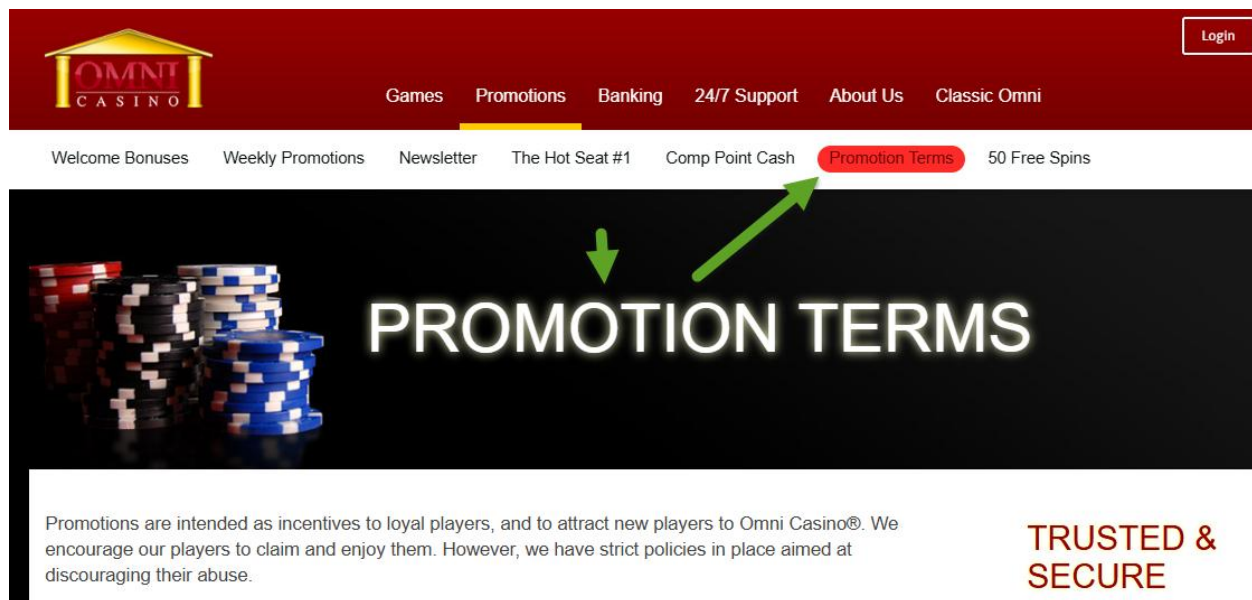
<https://convertstars.com/terms-and-conditions/>

Section II

- No Targeting of Vulnerable Groups – Marketing including visual content must not directly target Vulnerable People. **Active**
- No Portrayal of Gambling as an Investment – Advertising must not promote gambling as a way to achieve financial success or solve financial difficulties. **Active**
- No Misrepresentation of Skill vs. Chance – Marketing must not suggest that skill can influence the outcome of games that are purely based on chance. **Active**

- No Emotional Manipulation – Advertising must not portray gambling as a substitute for financial, emotional, or mental well-being **Active**
- Marketing materials must not feature minors or depict them engaging with gambling content. **Active**
- No Explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion. **Active**
- No Encouragement of Unrelated Harmful Behaviors – There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness. **Active**
- Bonus Conditions Bonuses and promotions are communicated transparently with clear terms and conditions. **Active**

<https://www.omnicasino.com/promo-terms>



The Company does not use bonuses to encourage excessive gambling.

Third Party Involvement

The Company, through our Marketing brand www.converstars.com is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors social media influencers, including wordings and visual representations, where the influencers actions and/or statement are paid placement or advertisement.

The Company will inform our contracted third-party's of our Responsible Gaming policy and require them to adhere to it. **PENDING**

- Responsible Gaming Messaging – All advertising must include a clearly visible responsible gaming **message or slogan**. **PENDING**

13 Enhanced Responsible Gambling measures **PENDING**

Based on higher levels of risk in its business model, the operator may decide to implement enhanced measures regarding responsible gambling. Higher levels of risk may be due to the business model being inherently high risk – see paragraph 2.2, or because of a disproportionately high number of an operator's players being assessed to be at risk either due to operator led checks or the numbers of players choosing to exclude/cool-off.

13.1 Internet Filtering Tools **Active**

To further prevent underage gambling, the operator is advised to remind adults that they should take precautions when sharing devices with minors - such as safeguarding usernames, passwords, and payment details. **Active**

<https://www.omnicasino.com/about/responsible-gambling>

13.2 Direct Player Interaction **Active**

- The Company does have the tools to deploy automatic or manual pop-up notifications in response to concerning behaviours. These notifications can include a link for the player to contact a trained Responsible Gaming professional.
- When a player exhibits behaviour that reasonably suggests they may be a Vulnerable Player, the operator must initiate direct contact. This communication must advise the player to review the Responsible Gaming area and consider using the available tools and support services. **Active**

13.3 Other Limits **Active**

In line with the Company's target player and/or market, other limits may be considered including loss limits, time limits or wager limits.

13.4 Reality Check **PENDING**

Reality check measures are varied, and if used the Company may implement these measures without compromising the user experience. However, if deployed, they will be fit-for-purpose and measures include, but are not limited to:

1. A real-time session timer that remains visible at all times while the player is logged in.
2. A real-time clock in the players time zone.
3. Periodic pop-up reminders or prompts about session duration.
4. Player-Activated Reality Checks. **PENDING**

Players may have the option to set customized reality check alerts at specific time intervals. When triggered, it requires the player to confirm that they have read the message before resuming play and offers the option to end the session or continue playing.

Customised Reality Checks must suspend play momentarily and require the player to confirm they have read the message before resuming play.

Custom messages may include:

- Clearly indicate how long the player has been playing.
- Display the player's winnings and losses during that period.