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WINLINK B.V.

RESPONSIBLE GAMBLING INTERNAL POLICY

Document / Revision History

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 Written by: Anastasiia Rogina Date: _____ Approved by: Gaurdian Corporation Curacao B.V. obo Gouloud Mercedes Hammoud Date: _____ Director WINLINK B.V. _____ _____	

Revision #	Version Date	Description of Changes
1.0	01/07/2024	Initial Draft
1.1	10.12.2025	Popularized paragraph 3.11.1. regarding requirements for self-restraint tools and clause 4.1. regarding the protection of minors.

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1. INTRODUCTION

This Policy specifies rules, approaches, and workflows for and regarding employees and independent contractors (hereinafter the “team members”) who work and provide their services for WINLINK B.V. (hereinafter the “Company”) in respect of the Company’s project operating under a Curacao license.

This Policy is aligned with the Code of Conduct, laws of Curacao, and the Responsible Gaming Policy for Licensed Operators dated April 17, 2025, developed by the Curacao Gaming Authority (the “CGA”).

The owner of the Policy is RGO unless otherwise stipulated in the Policy or the same/upper-level internal document.

Every team member, regardless of their position, must know and comply with this Policy while performing their duties and services. Every team member must keep in mind that their behaviour has a direct impact on players and the Company’s reputation.

If team members find themselves unable to resolve an issue independently or are unsure of whether they correctly understand the requirements of the Policy, they should contact the RGO for advice and clarification.

All team members should read and follow this Policy and related procedures, handbooks etc. If they have any questions, they should ask the RGO.

2. IMPORTANCE of RESPONSIBLE GAMBLING ACTIVITY

2.1. Background

The Company strives to offer its customers safe gambling. However, a small minority indulge in excessive gaming to the point that it starts to negatively affect their physical or mental health, relationships, work performance, finances, etc.

This is what is meant by 'Problem Gambling' - Problem Gambling is a great cause of concern for the Company.

Every team member shall understand his/her role in reducing the risk of harm from problem gambling for the customers and vulnerable groups of people (i.e., underage people, addictive players, etc.).

Responsible gambling is the scope of approaches established in the Company and aimed to minimize risks of problem gambling.

2.2. Risk mitigation approaches

The Company set up approaches to mitigate the risk of the problem gambling, namely:

- Implementing RG policies and culture
- Training team members
- Supporting informed decision making
- Game design and features
- Prevention of gambling by underage persons
- Identifying and assisting potential problem gamblers
- Setting financial limits in play
- Self-exclusion and breaks in play
- Responsible marketing and advertising

2.3. Violation of Responsible Gambling Requirements

Violation of the responsible gaming legislation will affect both the team member and the Company.

Violation by the team member may cause an internal investigation and punishment (i.e., disciplinary sanctions or dismissal).

3. RESPONSIBLE GAMBLING ACTIVITY

3.1. Departments and activities related to responsible gambling

Almost every team member, including senior managers, are involved in responsible gambling activity, namely:

- Management board
- HR department
- Marketing department incl. designers
- Customer support
- Procurements
- Financial Department
- DP Officer and its subordinates
- RG Officer and its subordinates
- Game and website developers and designers.

3.2. RG requirements for the Management Board

Members of the management board shall participate in mandatory trainings and courses on the importance and fundamental concepts of Responsible Gaming and the Company's role to minimize the

risk of Problem Gambling for their customers. They must understand the harms associated with gambling as well as essential prevention and mitigation concepts.

Members of the management board shall understand their impact on other team members behaviour and recognition of the importance to follow RG requirements.

Members of the management board shall encourage team members to develop their knowledge in RG approaches.

Members of the management board shall facilitate the development of or updating RG methods (i.e. policies, software, external trainings, etc).

3.3. RG requirements for the HR Department

Managers of the HR department shall be responsible for awareness of team members, especially newly come, regarding RG policies and procedures, folding relevant test results and certificates.

HR department provides communication between RGO and team members regarding acquaintance with the RG policy and its amended versions, notifications for passing the internal tests, requests for confirmation certificates.

3.4. RG requirements to the Marketing department incl. designers

Team members involved in marketing and advertising activities shall participate in mandatory training and courses on the importance and fundamental concepts of Responsible Gaming, as well as training on specific RG requirements tailored to their job duties.

Such team members shall make sure the marketing activity and advertisement designs are compliant with the Company's Advertising and Marketing Compliance Policy and the responsible gaming legislation.

Casino gaming advertising and marketing **should:**

- Strictly limit advertising of inducements, bonuses, and credits to existing customers who have specifically opted in to receiving this advertising material;
- Include clear instructions to opt out of receiving further promotional messages;
- Contain a responsible gaming message and/or a toll-free helpline number where practical;
- Include the CGA logo in website footers, as well as all visual media advertising materials;

- Strictly comply with all standards to make no false or misleading claims or create a suggestion that the probabilities of winning or losing at the various games offered by the casino, or by betting on sports contests, are different than those actually experienced;
- Disclose all material conditions and limitations of the offer at its first presentation on the gaming site, with all other conditions and limitations no more than one click away.

Casino gaming advertising and marketing **should not:**

- Contain images, symbols, celebrity/entertainer endorsements, and/or language designed to appeal specifically to children and minors
- Feature anyone who is or appears to be below the legal age to participate in casino gaming activity or imply that underage persons engage in casino gaming
- Encourage extensive gaming and chasing losses
- Contain claims or representations that casino gaming activity will guarantee an individual's social, financial, or personal success
- Promote gaming as an alternative to employment, as a financial investment, or as a requirement for financial security
- Link gaming to seduction, sexual success, or enhanced attractiveness
- Be placed before any audience where most of the audience is ordinarily expected to be below the legal age to participate in casino gaming or sports betting activity
- Imply or suggest any illegal activity

As part of a Company's social responsibility, Marketing department must run problem gambling prevention and responsible gaming campaigns with a goal of achieving a balance between responsible gaming advertising and promotional marketing.

3.5. RG requirements for the Customer support

Team members involved in customer support shall participate in mandatory trainings and courses on the importance and fundamental concepts of Responsible Gaming as well as trainings on specific RG requirements tailored to their job duties. They must understand the harms associated with gambling as well as essential prevention and mitigation concepts.

Customer support team members who interact with players should be able to identify and assist to players who might show signs of gambling-related harm and experience difficulties controlling their play.

Customer support team members should be knowledgeable about the helpline, self-exclusion/timeout, responsible gaming, online gaming blocking software, and local help resources and able to provide that information on request. All information should be in clear and simple language, ideally in multiple languages where necessary.

Customer support team members should be able to advise following help organizations

- Gamblers Anonymous: <https://www.gamblersanonymous.org/>
- GamCare: <https://www.gamcare.org.uk/>
- BeGambleAware: <https://www.begambleaware.org/>

3.6. RG requirements for the procurement process

Every team member involved in the gaming software procurement process shall participate in mandatory training and courses on the importance and fundamental concepts of Responsible Gaming, as well as training on specific RG requirements tailored to their job duties.

Such team members shall make sure the software and the supplier are compliant with the Company's Procurements Policy and the responsible gaming legislation.

At a minimum, the games design requirements include:

- Games shall not encourage players to chase their losses, or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they want to stop;
- Auto-play functions must be disabled, and all players should have the means to track the passage of time;
- Features such as turbo, quick spin, and slam stop are not permitted;
- Game play shall be initiated only after the player has placed a wager and activated play. No player shall be forced into game play by selecting the game for review or reviewing information about how the game is played or how bets are made;
- A player should commit to each game individually, releasing and then depressing the 'start button' or taking equivalent action.

3.7. RG requirements for the Financial Department

Every team member involved in processing players' transactions shall participate in mandatory training and courses on the importance and fundamental concepts of Responsible Gaming, as well as training on specific RG requirements tailored to their job duties.

The Financial Department shall provide further options for self-excluded players:

- Operators shall refund a player's wager if the player enrolls in a self-exclusion program prior to the commencement of an event or series of events on which the outcome of the wager is determined.
- Operators are not required to refund a player's wager if the player enrolls in a self-exclusion program after the commencement of an event or series of events on which the outcome of the wager is determined.

Operators shall cancel all future game transactions for self-excluded player.

3.8. RG requirements for the DP Officer and its subordinates

Every team member involved in the personal data protection process shall participate in mandatory training and courses on the importance and fundamental concepts of Responsible Gaming, as well as training on specific RG requirements tailored to their job duties.

As the Company stores player's personal data on its servers located in the EU/EEA, DPO shall provide compliance with the [Standard Contractual Stipulations](#) of the EU Data Commission

CGA aims to collaborate with operators to develop solutions that achieve business objectives while operating in a socially responsible way that protects players. The Company is expected to share anonymized player data with CGA for the purpose of advancing problem and responsible gambling research.

DPO shall maintain a register of players excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the Company)

3.9. RG requirements for the RG Officer and its subordinates

RGO and its subordinates are obliged to get external training regarding RG and develop their knowledge on a regular basis.

RGO is responsible for drafting policies and procedure and their implementation.

RGO is responsible for development RG approaches and strategies as well as evaluation of its effectiveness.

RGO shall monitor and eliminate all gaps in team member knowledge of RG.

RGO shall assist team members in resolving their difficulties subject to RG.

RGO is responsible for development of internal RG trainings.

3.10. RG requirements to the Legal Department

Every Legal Department team member shall participate in mandatory training and courses on the importance and fundamental concepts of Responsible Gaming, as well as training on specific RG requirements tailored to their job duties.

Reviewing contracts, the Legal Department team member shall check them for compliance with RG and Procurements/ Advertising and marketing compliance Policy requirements.

3.11. RG requirements for game and website developers and designers

Every team member involved in game and website development and design shall participate in mandatory training and courses on the importance and fundamental concepts of Responsible Gaming, as well as training on specific RG requirements tailored to their job duties.

3.11.1. Website settings and design requirements

At a minimum, the website settings and design requirements include:

- the website shall be developed in respect to minimize harmful impact of gaming;
- Free-to-play games available through the gaming site or related websites shall not misrepresent or mislead players as to the likelihood of winning or prize distribution of similar games, and shall have the same odds of winning as games played for money;
- The denomination of each credit shall be clearly displayed on game screens;
- Games shall not encourage players to chase their losses, or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they want to stop;
- Games shall not provide auto-play features for slots;

- Game play shall be initiated only after the player has placed a wager and activated play. No player shall be forced into game play by selecting the game for review or reviewing information about how the game is played or how bets are made;
- A player should commit to each game individually, releasing and then depressing the 'start button' or taking equivalent action. Continued contact with a button, key or screen should not initiate a new game;
- The gaming system must not offer functionality which facilitates playing multiple slots games at the same time. This includes, but is not limited to, split screen or multi-screen functionality.
- Combining multiple slots titles in a way which facilitates simultaneous play is not permitted;
- A player should commit to each game cycle individually, continued contact with a button, key or screen should not initiate a new game cycle;
- Features such as turbo, quick spin and slam stop are not permitted. This is not intended to be an exhaustive list but to illustrate the types of features the requirement is referring to;
- The registration page and pages within the player account must prominently display a Responsible Gaming statement, the online link to CGA, and a link to a page that provides Responsible Gaming material, information, resources, and support for people experiencing problems with gaming;
- Players must be provided an opt-in process whereby they actively consent to receiving any direct advertising and marketing of inducements, bonuses and credits, and must be provided a method to withdraw their consent at any time, where such marketing and advertising materials;
- Two key mechanisms must be made available to players at all times via the Self-restraint section of the website, with the further requirements (at minimum):
 - Cooling Off: A short-term, temporary restriction from gambling activities, which the player can customize:

Duration 24 h, 7 days, 1 month, 3 months;

Vertical options: all or particular products

Brand: all or a specific Company's brand
 - Self-Exclusion: A long-term, irrevocable exclusion from all gambling activities under the Company's licence, with the further requirements (at minimum):

Duration 1, 3, 5, 10 years or lifetime;

Account is closed. Player can no longer log-in.

- Players must not be guided or influenced toward one option over another. No interference, bonuses, or reassurances may be provided. Players must 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. Players must be provided with the tool to set limits on the total amount they deposit over a defined period (daily, weekly, or monthly).

3.11.2. Account information

Account information plays an important role in the self-assessment of a player's gaming habits. Therefore, all player account transactions should be made readily available and clear to the player. Requirements to the available account Information:

- At a minimum, the gaming system should give the player access to the following player account transactions:
- Deposit, withdrawal history, and current balance;
- Date and time of previous login;
- Gaming event and transaction history (game session outcomes and game transactions);
- Customer's net position (i.e., the total of all winnings minus the sum of all losses from the start of the session) for all gaming sessions;
- Method and source of funds used for transactions;
- Total monies wagered for session and/or period of time;
- Total monies won or lost for session and/or period of time;
- Account balance at start and end of session.

3.11.3. RG Awareness

The Company pays attention to players' awareness regarding RG and uses the website as a communication platform.

- Responsible gambling policy is always available at the website footer;
- During registration and in case of amendments the players are notified about RG policy and its updates;
- Players may be subject of test regarding their awareness about RG;
- Self-restraint features are easily accessible;

- Once player initiates a break (cooling-off, self-exclusion), the Website does not allow him to place further wagers during the time period of the break;
- Once the player self-excludes, he/she shall be immediately logged out of his/her account and unable to login in for the duration of their exclusion;
- The Company maintains a register of players excluded with appropriate records (name, address, other details, and any membership or account details that may be held by the Company);
- The Company takes active steps to identify, and if required, remove self-excluded players from the website when they are found to be in breach of their self-exclusion agreement.

4. PROTECTION OF UNDERAGE AND OTHER VULNERABLE PEOPLE

4.1. Protection of underage people

The Company declares zero tolerance for involving underage people in gambling. The Company's software and website are designed to process age verification, and team members are trained to perform age verification.

The Company enables its websites to permit filtering software to be used by adults (such as parents or within schools) in order to restrict access to relevant pages of the site.

Customer support team members are appropriately trained in the use of secondary forms of identification when initial verification procedures fail to prove that an individual is of legal age, namely:

- Verifying additional information about the customer, such as carrying out searches of credit reference and other databases that list names and addresses of individuals over the age of 18;
- Carrying out secondary age verification checks in any circumstances that give the operator reason to suspect that the person may be underage;
- Before a player account is created, players shall affirm that all player's information provided upon registration is complete and accurate, including age verification;
- The player is not permitted to access a gambling account or permitted to deposit and gamble until the registration procedure is completed.

Once, despite all taken actions, the Company becomes aware that the player is a minor, their account will be closed immediately, and their deposits will be refunded; their winnings will be forfeited, and the player will be notified about the reason of closing their account.

The Company maintains records of all age verification processes and their outcomes to make them available for regulatory review.

Regardless of the above, proof of age document submission and checks are subject to the CGA's Know Your Customer and AML policies and should at a minimum include a government-issued valid ID check (such as a passport, national ID, or driver's license) on reaching specified thresholds and in any case prior to first withdrawal.

Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification, may be undertaken by the Company's team member at its own discretion, but do not supersede the government-issued document requirement.

4.2. Protection of vulnerable people

The Company acknowledges risks of harm from the problem gambling on particular social groups such as addicted gamblers.

The website design, marketing activity customer support team shall serve to identify, prevent and minimize the risks of Problem Gambling in a timely manner.

The Company implements self-restraint methods such as limits, cooling-off and self-exclusion option, etc. The Company takes action to increase awareness of the players regarding RG via direct notifications, website notifications, customer support team chat.

The customer support team is able to help player to identify signs of addictive gambling behaviour.

The Company develops risk score matrix to evaluate the player's gaming behaviour and takes action regarding high-risk players.

5. AMENDMENTS TO THE POLICY

The Company may review and amend this Policy from time to time, but not less than once per year.

The Company undertakes to notify the team members about changes that have been made, and the team members are obliged to review the amended Policy.

Any amendment, addition, and/or change to the Policy shall take effect from the moment the updated Policy is published for internal use.

The Company is open to feedback and advice from our team members regarding optimization and enhancing our Responsible Gambling Internal Policy and procedures.