



Digitain Curacao B.V.

Responsible Gaming Policy

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1. Glossary

Terms/Abbreviations	Description
Gambling	Gambling is the act of risking something of value, typically money, on an event or game whose outcome is largely determined by chance, with the aim of winning a prize or reward. It generally involves three key elements: consideration (the stake or wager), risk (the uncertainty or chance involved) and a potential prize (the reward or gain if successful).
CGA	Curacao Gaming Authority

Gaming License	Means a license for organizing, or providing the opportunity to play, a Game of Chance
Supplier License	Means a license for offering Critical Services or Goods
Responsible gaming	Responsible gaming focuses on ensuring a safe and enjoyable gaming experience while protecting players from potential harm. It involves actions like setting spending limits, offering self-exclusion options, providing support for those struggling with gambling issues and ensuring fairness in gameplay. The aim is to prevent addiction, financial difficulties and other negative impacts, making sure gaming stays a form of entertainment rather than a risk.
Corporate Responsible Gambling Policy	Company's commitment to responsible gambling, player protection and harm reduction. It specifies leadership's role in promoting responsible gambling, including appointing an executive or senior staff member to oversee and implement policies, procedures and ongoing initiatives.
Problem gambling	Problem gambling refers to gambling behaviors that have a detrimental impact on an individual, their family, or the broader community. These impacts can include financial, physical, emotional and social consequences. Problem gambling can disrupt personal relationships, job performance and overall health. Moreover, individuals engaging in problematic gambling are at an increased risk of developing a gambling disorder.
Gambling disorder	Gambling disorder is an officially recognized mental health condition. It is characterized by a range of symptoms, including the need to gamble with larger amounts of money to experience the same level of excitement, deception to conceal gambling activities and repeated, unsuccessful attempts to reduce or stop gambling.
Vulnerable Person	Means a person who: i. is under eighteen years of age; ii. 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; iii. has been banned from playing any Game of Chance either by force or at his or her own request; iv. has been declared bankrupt, or has otherwise lost the control or disposal of all or part of his or her property;
Self-exclusion	Self-exclusion in gambling is a voluntary process in which an individual chooses to exclude themselves from participating in gambling activities, either for a specific period or indefinitely, as a strategy to manage or prevent problem gambling behavior. This may apply to casinos, online platforms and other gambling establishments. It is designed to help individuals regain control over their gambling habits.
Mandatory Requirements	Mandatory Requirements in Responsible Gambling are regulatory obligations that gambling operators must follow to promote safe gambling. These include age verification, setting betting limits, offering self-exclusion options, providing risk information and ensuring access to support services to minimize harm and protect consumers.

B2B	Business to Business. It describes transactions or interactions that occur between two businesses, as opposed to between a business and individual consumer (which is referred to as B2C, or Business-to-Consumer). In a B2B model, one company sells products or services to another company.
B2C	Business to Consumer. It describes the transactions or interactions between a business and individual customer, where the business directly sells goods or services to the end user.

2. Commitment to Responsible Gambling

At Digitain Curacao B.V. we are deeply committed to fostering a responsible gaming environment that prioritizes the safety, well-being and enjoyment of players. While holding a B2B GCB license, we are committed to ensuring that all products we offer to B2B/B2C operators comply with Responsible gambling measures. Our objective is to provide a safe, enjoyable and controlled gaming experience, promoting responsible player engagement and minimizing the risks associated with excessive gambling. Digitain Curacao B.V., as a licensed and trusted provider of gambling services, is committed to fully respecting and supporting industry regulations that are both fair and effective. We prioritize the prevention of pathological gambling, gambling disorder and the protection of vulnerable players (including minors), ensuring that our operations uphold the highest standards of responsible gaming to foster a safe and secure environment for players. Along with creating innovative technological solutions to tackle safer gambling issues and enhance industry standards, Digitain Curacao B.V. is dedicated to following responsible marketing and advertising best practices, while ensuring full compliance with applicable laws and regulations.

3. Purpose, application and Scope of This Policy

Digitain Curacao B.V. is committed to supporting responsible gambling practices in all aspects of our business as a supplier of online gambling products. This policy outlines our approach to ensuring compliance with relevant regulations, promoting player safety and supporting our partners in providing a secure, enjoyable and responsible gambling experience. We are dedicated to minimizing gambling-related harm through proactive measures and providing the tools necessary to safeguard players. The purpose of this Policy is to define Digitain Curacao B.V.'s commitment to upholding CGA standards of responsible gaming. It outlines the company's approach to ensuring player protection, mitigating gambling-related harm, complying with relevant regulations and fostering a secure, transparent and enjoyable gaming environment for participants. This Policy applies to commercial communications conducted by Digitain Curacao B.V. and it is applicable to individuals working for or on behalf of Digitain Curacao B.V.

4. Compliance with Regulatory Standards

As a supplier of online gambling products and services, Digitain Curacao B.V. adheres to relevant regulations established by the Curacao Gaming Authority (CGA) as well as other pertinent local and international governing bodies. We are committed to ensuring that all our offerings comply with the standards of responsible gambling. This commitment includes:

- Full compliance with applicable licensing and regulatory requirements.
- Integration of Responsible gaming features into all of our products and services.
- Ongoing audits and updates to guarantee continuous alignment with evolving responsible gambling regulations.

5. Responsible Gambling Solutions for Operators

As a trusted supplier, we provide B2B/B2C operators with a comprehensive suite of Mandatory Requirements, tools and features designed to facilitate the implementation of responsible gambling practices for their players. It works as a preventive attitude based on self-control and user-control.

Gambling necessarily involves an element of risk, but Digitain Curacao B.V. intends its products/services to be used in a way which is safe, which reduces the chance of its products/services being used by problem gamblers and prevents underage people from being harmed. This broadly encapsulates the principle of Safer Gambling and reflects the licensing objective of “protecting children and other vulnerable persons from being harmed or exploited by gambling”.

As an overview, our measures to provide Safer Gambling shall include:

(a) minimizing problem gambling, including:

i. responsible design – designing products in a way that minimizes the risk of encouraging problem gambling;

(b) protecting children:

i. requiring our B2B/B2C operators to contractually commit to complying with the standards, preventing underage gambling;

ii. ensuring that children are not employed by Digitain Curacao B.V.;

iii. designing products in a way that minimizes the risk of encouraging underage gambling

5.1 Responsible design

We must ensure that any products we offer are designed responsibly and to minimize the likelihood that they exploit or encourage problem gambling behavior.

This requires that any products we offer do “not actively encourage customers to chase their losses, increase their stake or increase the amount they have decided to gamble, or continue to gamble after they have indicated that they wish to stop.”

For example, we will not:

- Use written or graphical information that encourages players to try to win back their losses;

- Encourage players who have chosen to exit a game, to continue playing by, for example, being offered a free game.

5.2 Client obligations

We will require our Clients to contractually confirm that they will be responsible for ensuring that they comply with all applicable requirements or guidance.

5.3 Preventing underage gambling

Digitain Curacao B.V. must ensure that our products and services are not accessible to individuals who are under the legal age to use them. We will require our B2B/B2C gambling operator Clients to contractually confirm that they will be responsible for ensuring that they do not permit any underage individuals to use our games.

5.4 Preventing employment of children

We will not employ individuals who are under the legal age to provide facilities for gambling. Our Human Resources department will ensure that all staff are properly vetted to confirm they meet the legal age requirements.

5.5 Responsible gaming configurations

The configurations for Digitain Curacao B.V.'s to secure Responsible Gaming requirements for the supplied products are made both from the back office and from the player's profile on the website.

These include.

- **Age Verification:** Digitain Curacao B.V. provides its partners with the tools to ensure that only players who meet the legal age requirements are granted access to gambling services.
- **Deposit Limits:** Enabling players to set personal limits on deposits, fostering better control over their gambling expenditure. Deposit Limits controls the maximum amount that the player can deposit in a specific period. As soon as the player reaches the specified limit, s/he cannot make another deposit to his/her account. The Deposit Limits functionality is manageable by both the admin users and the players for the project.
- **Bet Limit:** The Bet Limit option allows setting a limit for the amount the player can spend on making bets within a certain time period.
- **Loss Limit:** The Loss Limit option allows setting a limit for the amount the player can lose within a certain time period.
- **Self-Exclusion** – Digitain Curacao B.V. offers players the option to self-exclude from gambling activities, promoting a healthier gaming environment. Self-exclusion is an important tool that helps players who wish to refrain from betting and making deposits.

- **Reality Checks:** Automated reminders that assist players in monitoring their time and financial commitment to gambling activities. Reality Check is set for the player, a pop-up alert is displayed as a reminder that the player has remained logged in for the specified period of time.
- **Self-Assessment:** Digitain Curacao B.V. offers users the opportunity to evaluate their own gambling behavior and make informed decisions through various tests.
- **Behavior Tracking:** Digitain Curacao B.V. offers fundamental tracking capabilities for bets and deposits, providing operators with valuable insights into player activity.
- **Cooling off/Time out period:** Cooling off option gives the player an opportunity to take a short-time break from all betting activities. If this functionality is activated, the player will not be able to log in to their account and perform any activities during the set time range.
- **Marketing and Advertising:** Digitain Curacao B.V. is committed to ensuring that all marketing and advertising practices align with responsible gambling principles. As a supplier, we ensure that our promotional materials do not target minors or vulnerable individuals, avoid misleading or exaggerated claims in marketing campaigns, focusing instead on responsible messaging.

6. Collaborative Support for Operators in Fostering Responsible Gambling

At Digitain Curacao B.V., we recognize the vital role of collaboration in cultivating a responsible gambling environment. As a trusted supplier, we offer comprehensive, ongoing support to our partners by sharing industry-leading best practices, enabling operators to stay ahead of the latest trends and innovations in responsible gaming.

7. Staff Training and Awareness in Responsible Gambling

Digitain Curacao B.V. is dedicated to ensuring that our internal teams are thoroughly trained in responsible gambling policies by recognizing the signs of problem gambling and equipping staff with the knowledge and tools to mitigate associated risks effectively and ensuring that employees possess a deep understanding of the regulatory landscape and the significance of fostering a responsible gaming culture.

8. Monitoring and Reporting

As part of our commitment to transparency and accountability, Digitain Curacao B.V. rigorously monitors responsible gambling activities across our products/services. This includes:

- Ongoing monitoring of product performance to ensure that responsible gambling features are operating effectively and delivering the desired outcomes.
- Regular assessments to identify any potential areas for improvement and ensure continuous alignment with best practices and regulatory standards.

9. Commitment to Continuous Improvement in Responsible Gambling

Digitain Curacao B.V. is fully committed to the ongoing enhancement of our responsible gaming practices. We consistently review and refine our products, policies and procedures to ensure they remain effective in promoting responsible gambling. This commitment includes:

- Conducting thorough research into new responsible gambling technologies and seamlessly integrating them into our offerings.
- Continuously adapting our policies to comply with emerging regulatory requirements and industry best practices.
- Actively engaging with industry stakeholders to ensure that our practices remain aligned with the latest trends, innovations and global standards.

10. Accountability and Transparency in Responsible Gambling Practices

At Digitain Curacao B.V., we are fully committed to upholding accountability for the responsible gaming practices associated with our products and services. As part of this commitment, we:

- Ensure transparency in our responsible gambling initiatives by providing clear, comprehensive reporting.
- Foster close collaboration with our partners to address any concerns or incidents related to problem gambling behavior promptly and effectively.
- Continuously assess our impact on the gambling environment and make necessary adjustments to further strengthen player protection and maintain high industry standards.

11. Conclusion of Official Policy on Responsible Gambling

As a leading provider of online gambling products/services, Digitain Curacao B.V. is fully committed to promoting responsible gambling practices across the industry. We work closely with our partners to equip them with the necessary tools, resources and guidance to protect players, ensure regulatory compliance and maintain a secure and responsible gambling environment. Through continuous improvements, targeted training and proactive collaboration, we strive to minimize gambling-related harm and contribute to the development of a responsible gaming culture.

This policy demonstrates Digitain Curacao B.V.'s firm commitment to responsible gambling as an integral part of our operations and our partnerships. We are dedicated to upholding the highest standards of player protection and fully supporting the responsible gaming initiatives of our clients.

12. Policy Amendments and Reporting to the Curacao Gaming Authority

In the event of any amendments to this policy, Digitain Curacao B.V. is committed to promptly informing the Curacao Gaming Authority (CGA). This ensures that we maintain full compliance with all relevant regulatory requirements and uphold the highest standards of transparency and accountability.