

COMEBACK N.V.

SUSTAINABLE GAMING POLICY

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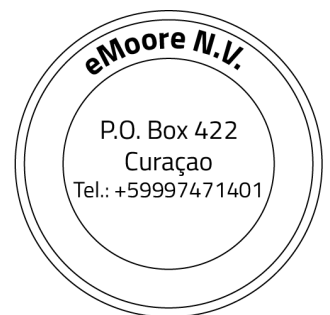


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INTRODUCTION

Comeback N.V. is a registered company operating under the laws of Curaçao, and in virtue of a transition period, it operates online gaming services whilst in the process of obtaining a Gaming License from the Curaçao Gaming Authority. Hereinafter, Comeback N.V. will be collectively referred to as the "Licensed Company" or "Company."

Committed to safeguarding the well-being of its patrons from potential harm associated with the online gaming services provided, the Licensed Company has developed this Sustainable Gaming Policy to establish a comprehensive framework for player protection. Aligned with applicable sustainable gaming (responsible gaming) requirements, this policy endeavors to mitigate the potential adverse effects stemming from the Licensed Company's services.

All individuals employed by the Licensed Company, as well as those occupying similar roles, collectively referred to as "Staff," throughout the organizational structure, bear a duty of care toward its patrons—referred to herein as “players” or “customers”—and are expected to promptly report any concerns regarding a player's behavior to the Sustainable Gaming Coordinator or, in their absence, their designated representative.

1. PURPOSE AND APPLICABILITY

The purpose of this policy is to establish a comprehensive framework that supports the provision of a safe, responsible, and enjoyable gambling environment. It aims to ensure that gambling remains a form of entertainment rather than a source of harm. This policy reflects the Licensed Company's commitment to promoting sustainable gaming practices and includes proactive steps to identify, prevent, and mitigate gambling-related harm, particularly among vulnerable persons. By safeguarding the welfare of its patrons, the policy serves as a guiding document that reinforces the Licensed Company's dedication to integrity, compassion, and social responsibility across all areas of its gaming operations.

This policy applies to all personnel and individuals in roles akin to staff, regardless of their function within the Licensed Company. It governs the gaming operations of the Licensed Company as outlined herein and as may be supplemented by additional operational guidelines as necessary.

2. POLICY REVIEW

This Sustainable Gaming Policy will be reviewed at least annually or whenever there are significant developments in regulatory expectations or internal operations. Suggestions for updates may be directed to the Licensed Company's sustainable gaming representative, who may engage internal or external expertise as appropriate.

The Licensed Company recognises that regulatory expectations surrounding responsible gaming continue to develop over time. As such, the Company remains committed to proactively reviewing and adapting its policies and practices to ensure they remain fit for purpose and aligned with applicable requirements and industry standards.

Major policy changes or introductions require approval from senior management and the Board. The sustainable gaming representative will communicate changes and updates to staff and ensure accessibility through a shared digital platform.

3. LEGAL FRAMEWORK AND COMPLIANCE

This policy reflects the legal obligations that apply to the Licensed Company under Curaçao law. Curaçao Framework applicable to Comeback N.V.:

- National Ordinance on Games of Chance (LOK)
- CGA Responsible Gaming Policy for Licensed Operators

3.1. Disciplinary measures and legal consequences

This policy implements requirements under the LOK and CGA rules. Staff of the Licensed Company are expected to comply with the provisions set out in this policy. Failure to do so may result in disciplinary action, including potential termination of employment or contract.

3.2. Sustainable Gaming Coordinator

The Licensed Company designates a sustainable gaming representative under the working title of Sustainable Gaming Coordinator, with overall responsibility for sustainable gaming matters. The Sustainable Gaming Coordinator is part of the Customer Experience department (CX department), working closely with teams such as Customer Support, Fraud, AML and Payments. The CX department's performance is not evaluated based on monetary or business-driven metrics. This separation from financial interests enables team members to carry out assessments, reporting, and decision-making impartially and objectively. The Sustainable Gaming Coordinator reports to the Chief Experience Officer (CXO).

3.2.1. Core functions of the Sustainable Gaming Coordinator

The Sustainable Gaming Coordinator is responsible for:

- Day-to-day sustainable gaming operations, including, but not limited to, player monitoring, risk assessment and interventions, handling account reopening requests, and evaluating sustainable gaming escalations from other teams and departments.
- Operational controls: specifying, implementing, and monitoring the effectiveness of sustainable gaming tools and processes.
- Training and awareness: organizing and/or delivering sustainable gaming training for all relevant staff.
- Regulatory compliance: staying informed of regulatory changes, sharing relevant updates internally, and ensuring timely implementation of required measures.
- Regulatory reporting: notifying the CGA of any substantial amendments to this policy and submitting other reports as required.

3.2.2. Reporting obligations of the Sustainable Gaming Coordinator

- Weekly and monthly operational insights reporting to leaders in the CX Department.
- Quarterly sustainable gaming operational, compliance, and product development review to leaders in the CX department.
- A formal written report delivered to the executive management team at least once every twelve (12) months, which summarizes the effectiveness of this policy and outlines any proposed operational and/or policy enhancements.

- Miscellaneous reports are prepared and delivered on an ad hoc basis, responding to specific requests or emerging issues to provide timely and relevant information outside the regular reporting schedule.

3.2.3. Designated employees

Given the importance of the Sustainable Gaming Coordinator's position, it is crucial that they continue to be accessible even outside of working hours. However, during absences, the Licensed Company may appoint a designated replacement (or replacements) to stand in to ensure the continuity of its sustainable gaming operations.

4. PLAYER PROTECTION

4.1. Risk prevention

Player protection does not encompass only those individuals who have been detected to be vulnerable or at risk of potentially harmful gambling; adequate player protection begins even before players come to the attention of the sustainable gaming representative. All patrons who engage in the services offered by the Licensed Company are subject to player protection, with sustainable gaming-related information and tools readily available for all players.

This creates a gaming environment where sustainable gaming is promoted and encouraged to every individual who may deem it beneficial. Consequently, players retain autonomy to make choices and decisions aligned with their preferences and circumstances.

4.2. Risk assessment

In conducting a risk assessment of players' gambling behavior, a systematic approach is employed to identify and mitigate potential risks. Key factors considered include:

1. Frequency and Intensity of Gambling: Monitoring the regularity and size of deposits, wagers, and gaming activity.
2. Duration of Sessions: Identifying patterns of prolonged or extended gambling sessions.

3. Spending and Transaction Patterns: Reviewing high-volume transactions, repeated failed payments due to insufficient funds, cancelled withdrawal requests, and credit card usage.
4. Behavioral Changes: Detecting sudden increases in gambling activity, frequent adjustments to sustainable gaming tools, or repeated use of cooling-off periods.
5. History of Account restrictions: Reviewing past instances where players have applied account restrictions, as these may signal prior difficulties in managing gambling behavior or recurring patterns of concern.
6. Customer Interaction History: Monitoring frequent or escalated contact with Customer Support, including bonus-related requests or signs of agitation.
7. Account Management Activity: Identifying attempts to create multiple accounts to bypass existing limits.
8. External Indicators: Considering contextual factors such as known financial stress or personal hardship, where relevant.

Once potential risks are identified, proactive measures are taken to address them. This includes engaging with players and offering support, along with providing guidance on available sustainable gaming tools.

4.2.1. Monitoring mechanisms

The Licensed Company employs internal monitoring tools to identify players who may be at risk of gambling-related harm, with particular emphasis on detecting vulnerable players. These tools operate in real time and are designed to highlight concerning patterns or behaviors, such as significant losses or sudden changes in activity. A risk-based approach is applied to determine the appropriate level of monitoring, with alerts and reports supporting timely review and, where necessary, intervention.

4.2.2. Internal escalations

Staff of the Licensed Company must immediately report to the Sustainable Gaming Coordinator if they:

- Observe any player behaviour, communication, or account activity that may indicate a risk of gambling-related harm;
- Become aware of a player expressing distress or loss of control related to their gambling activity;
- Identify any technical or procedural failure that could affect the effectiveness of sustainable gaming measures;
- Receive a complaint, concern, or inquiry from a player or third party relating to sustainable gaming that cannot be resolved through standard procedures.

While this applies to all staff, customer-facing teams, such as Customer Support, Payment Operations & Fraud, and VIP Account Managers, are particularly well-positioned to identify and escalate such concerns.

The Sustainable Gaming Coordinator is responsible for evaluating each escalation and, where necessary, taking appropriate action, which may include initiating an internal review, triggering a player-level intervention, or notifying senior management.

4.3. Intervention

In implementing sustainable gaming measures, the Licensed Company adopts a risk-based approach to determine the appropriate type and level of intervention. Significant emphasis is placed on direct communication with players, prioritising outreach and engagement over the immediate imposition of limits or account restrictions. Interventions aim to support informed decision-making and promote behavioural change, with actions tailored to the individual circumstances of each case.

5. SUSTAINABLE GAMING TOOLS

The Licensed Company provides a range of tools and features designed to support sustainable gaming. These tools aim to help players maintain control over their gambling activity and make informed decisions about their play.

5.1. Gaming Limits

The Licensed Company provides players with tools to manage and control their gaming activity in a manner that supports responsible play and aligns with individual habits and preferences. These tools allow players to set boundaries for defined periods, including daily, weekly, and monthly intervals, giving them flexibility to tailor restrictions to their personal gaming behavior.

Once a gaming limit is reached, no further transactions or activity that would affect that limit can be made until the specified period resets. Players may adjust their limits at any time. Requests to increase the severity of a limit take effect immediately, while requests to decrease or remove a limit are implemented only after a 24-hour waiting period to ensure decisions are made thoughtfully. Any activity initiated prior to a limit being set remains unaffected.

Certain exceptions may apply where active gameplay or wagers are in progress, such as ongoing tournaments or unresolved bets on future events. In these situations, limits are applied immediately to new activity, while existing gameplay or wagers are allowed to continue until their conclusion. Players cannot engage in additional gameplay or transactions that would affect the limit until the restriction has taken effect.

The Licensed Company encourages players to regularly review and adjust their limits in accordance with their gaming activity. A range of additional responsible gaming tools and resources, including reminders and optional breaks, are available to support players in maintaining control and fostering a safe and enjoyable gaming experience.

5.2. Cooling-off

The Licensed Company provides players with the option to take a temporary break from gambling through a cooling-off period. Players can initiate a cooling-off directly via the Company's website(s). During a cooling-off, players may select the duration of the break, ranging from 24 hours up to 180 days, and choose whether it applies to specific or all product verticals.

The restrictions take effect immediately once confirmed. During the cooling-off period, the account remains active with funds accessible for withdrawal, while all gambling features are temporarily disabled. Marketing communications, bonuses, and promotional offers are blocked for the duration of the cooling-off period. After the selected period expires, accounts are automatically reactivated, requiring no further action from the player. Optional online verification may be requested for longer periods to ensure the player is aware of their selection.

5.3. Self-Exclusion

For longer-term account restrictions, players may request self-exclusion through Customer Support. Self-exclusions are applied at the earliest possible opportunity and no later than 24 hours from the request. While the long-term self-exclusion process currently requires manual handling by the operator, the Company plans to implement automation in the future to allow self-exclusion without operator intervention.

The Company ensures that players may self-exclude for set periods, including but not limited to 1 year, 3 years, 5 years, 10 years, or lifetime, and on all brands and domains under the operator's license. Once self-excluded:

- The player's account is closed, and the player may not log in or participate in further gambling activity.
- Self-excluded customers are opted out of marketing communications.
- Measures are taken to identify and prevent possible duplicate accounts created to circumvent the self-exclusion.

- A player's choice to self-exclude is respected, and no efforts are made to reverse or discourage it.

The Company retains records of self-exclusions in accordance with applicable record-keeping requirements.

5.3.1. Reactivation post self-exclusion

Player accounts subject to a self-exclusion period cannot be reactivated before that period has elapsed. After the requested period has passed, the player must submit a written request to Customer Support to reactivate the account. The Company does not initiate reactivation by recommencing communication with self-excluded players.

5.3.2. Operator-initiated exclusion

While requests to self-exclude are typically initiated by the player, the Licensed Company reserves the right to apply account restrictions in certain cases as part of a broader risk-based approach to player protection.

5.4. Self-Assessment

To support player awareness and informed decision-making, the Licensed Company provides access to a self-assessment tool based on the Problem Gambling Severity Index (PGSI), allowing individuals to reflect on their gambling habits in a confidential and non-intrusive manner. These tools encourage players to regularly assess their gaming activity and determine whether it remains within healthy limits.

Players can also access and review their gaming history to better understand their patterns of play. These resources are designed to encourage informed choices and facilitate access to relevant guidance and support where needed.

The self-assessment tools enable players to identify potential problem gambling behaviors and make informed decisions about their gambling activity. These resources also facilitate access to relevant guidance and support where needed.

5.5. Accessibility

The Licensed Company ensures that, on its website(s), players have continuous access to sustainable gaming resources through a dedicated Sustainable Gaming page. This page outlines the Company's commitment to sustainable gaming, provides guidance on available tools, and allows direct navigation to features such as gaming limits, account restrictions, and self-assessment. It also includes contact information for the Licensed Company and links to external support services specialising in problem gambling and addiction prevention. These resources are reviewed periodically to maintain relevance and support coverage.

A link to the Sustainable Gaming page is included in the footer of the Company's website(s). The footer also contains a statement that gambling is strictly prohibited for individuals under the age of 18, along with key licensing details and access to trusted problem gambling support organisations.

Internationally recognised support organisations listed on the Company's website(s):

- gamblingtherapy.org
- quitgamble.com
- gambleaware.org
- gamcare.org.uk

- betblocker.org

6. TRAINING

The Licensed Company recognises that sustainable gaming practices rely not only on systems and policies, but also on the competence and awareness of its staff. All customer-facing employees—including customer service, payments, fraud, and VIP account management—receive comprehensive training to ensure they are equipped to engage with players in a responsible and supportive manner.

The training focuses on identifying potential signs of gambling-related harm, such as distress, frustration, or financial strain. Staff are guided on how to approach such situations with empathy and professionalism, using structured communication techniques that promote trust and minimise stigma.

Employees are also trained on the key sustainable gaming tools available to players and are expected to provide clear, neutral information when appropriate. The aim is not to diagnose or intervene clinically, but to offer timely support and direct players to suitable options or resources when signs of harm emerge.

Training is delivered during onboarding and refreshed regularly to ensure alignment with internal procedures and evolving standards. The Company views this as an ongoing commitment to fostering a culture where player well-being is integrated into daily operations and customer-facing interactions.

7. PREVENTION OF UNDERAGE GAMBLING

The Licensed Company prohibits underage gambling and implements measures to prevent minors from participating in games of chance. During account registration, players must provide their date of birth and confirm they are over 18 years old by selecting a designated checkbox.

In the unlikely event that an underage player does manage to play, the account will be closed immediately upon detection. Any deposits made by the underage player are subject to a refund, and any winnings generated are subject to forfeiture.

The Licensed Company maintains records of all age verification processes and their outcomes.

8. ADVERTISING AND MARKETING

The Licensed Company recognises the importance of conducting advertising and marketing activities in a socially responsible manner. While advertising is an essential part of business operations, it should not undermine the Company's commitment to player protection or sustainable gaming principles by targeting vulnerable players, encouraging excessive gaming, or misleading the customer, such as portraying gambling as an investment.

Marketing efforts are designed with consideration for vulnerable players—those at higher risk of gambling-related harm, including individuals who are underage or experiencing personal,

emotional, or financial challenges. The Company avoids messaging that suggests gambling can solve these difficulties, or that tries to capitalize on players' vulnerable situations.

Bonuses and promotions are not used as a way to encourage excessive gambling, and the terms and conditions of bonuses and promotions are communicated to the customers clearly.

Where third parties such as affiliates, brand ambassadors, or influencers are involved, the Licensed Company takes reasonable steps to inform these parties about the Company's approach to responsible gaming and marketing integrity.

While marketing practices may evolve over time, the Company remains attentive to the broader implications of its communications and aims to act in a way that supports long-term player well-being. Therefore, the company will include a Sustainable Gaming message in its advertising activities.