

Responsible Gaming and Prevention of Pathological Gambling Disorders Policy

NEXTGATE N.V.

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Information regarding the Responsible Gaming Policy

Area responsible for drafting the policy:	Legal Department
Area(s) responsible for reviewing the policy:	Legal; Finance; Privacy and Data Protection, Payments; Human Resources, Customer Experience, Project Management, Communications
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Responsible Gaming Policy History

Version	Issuance/revision date	Changes implemented
1	Oct. 02nd, 2024	First Version
2	May 22nd, 2025	Revision for compliance and company name update to NEXTGATE N.V., and removal of specific references as requested.
3	September 18, 2025	Revision for compliance and update according to new CGA requirements

Approvals

Act	Date	Professionals	Area or Department
		Aroldo Soares	Legal
		Andre Ribeiro Soares	Legal

Legislation for reference

- Law N. 8,069, of July 13th, 1990
 - Law N. 8,078, of September 11th, 1990
 - Law N. 13,709, of August 14th, 2018
 - Law No. 13,756, of December 12th, 2018
 - Law No. 14,790, of December 29th, 2023
 - Ordinance SPA/MF No. 1,330, of October 26th, 2023
 - Ordinance SPA/MF No. 615, of April, 16th 2024
 - Ordinance SPA/MF N. 722, of May 2nd, 2024
 - Ordinance SPA/MF N. 827, of May 21st, 2024
 - Ordinance SPA/MF No. 1,231, of July 31st, 2024
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1. INTRODUCTION

1.1. Purpose

By means of this Responsible Gaming Policy, the procedures adopted by the Company to address the challenges associated with Responsible Gaming are presented, which includes, but is not limited to, the prevention and mitigation of gambling addiction and of the access made by children and adolescents to gaming. By implementing these procedures, the Company intends to address the issues related to Responsible Gaming, in accordance with Applicable Law. The Company also clarifies, through this Responsible Gaming Policy, the operation of its Platform and Betting System, for the purposes of implementing Responsible Gaming.

1.2. Scope of application

The provisions of the Responsible Gaming Policy are applicable to the Company, as a betting operating agent constituted under the terms of the Applicable Law; to all its Administrators; Professionals and Partners; Users; and any third parties that may have a relationship, directly or indirectly, with the Company and access the Platform and the Betting System.

Administrators, Professionals and Partners and Users must: (i) express their awareness regarding the provisions of this Responsible Gaming Policy; (ii) undertake to comply with all determinations and guidelines set out on the topic; (iii) participate in training and guidance regarding Responsible Gaming and related topics, as applicable; and (iv) support the monitoring of behaviors, activities and movements that may be identified as signs of addiction and/or pathological gaming disorders of Users.

2. Responsible Gambling

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

The Company respects the rights of our Customers to enjoy our services and to take responsibility for their own conduct but also acknowledges the duty to our customers to provide them with appropriate information that may assist them to manage their gambling. As a general principle no credit shall be offered to customers for the purpose of wagering.

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

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

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

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

- Age Verification: Customers must be at least 18 years old to participate in any gaming activities. Age verification is done during the account registration process.
 - Self-Assessment Tools: We provide self-assessment tools to help Customers evaluate their gaming behaviour and identify potential risks. These tools are accessible via our website;
 - Behaviour Tracking: Our system monitor Customer behaviour to detect signs of problem gambling and intervene when necessary. This includes tracking deposit patterns, frequency of play, and time spent on gaming activities;
 - Deposit Limits: Customers can set daily, weekly, or monthly deposit limits to manage their spending;
 - Cool-off periods and Self-exclusion: Customers can opt for temporary cool-off periods or self-exclusion to take a break from gaming. Self-exclusion can be set for periods ranging from 1 year to lifetime.
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3. COMMITMENTS AND DUTIES RELATED TO RESPONSIBLE GAMING

With the purpose of preventing addiction and pathological gambling disorders and acting to prohibit betting by children and adolescents, the Company undertakes to act diligently not only in structuring its Betting System, but also in all advertising and marketing actions, in physical or electronic channels.

The Company will not enter into partnerships, agreements, contracts or any other form of arrangement or business adjustment to enable or facilitate access to credit by the User for betting purposes.

The Company will also prevent registration on its Platform and Betting System by Persons Prohibited from Betting, as indicated in the Applicable Law.

3.1. Information available in Platform and in the Betting System, as applicable

The Company's Platform and Betting System, as applicable, present the following information and guidelines to the User:

- a. at the time of User registration on the Platform: regarding the risks of addiction, pathological gambling disorders and loss of bet amounts;
- b. each time the User accesses the Betting System: regarding the risks of addiction, pathological gambling disorders and loss of bet amounts;
- c. regarding the theoretical return to the User of each online game available on the Betting System; and
- d. about warning signs for self-monitoring regarding the risk of addiction and pathological gambling disorders.

The User must be guaranteed access to a permanent and easily accessible information panel, containing at least the following information: (i) graphic account data; (ii) time of use of the Betting System; (iii) financial losses incurred; and (iv) the available financial balance.

3.2. Gaming Management Tools: Limits and Self-Exclusion

The Company's Platform and Betting System, as applicable, present the following possibilities and gaming management tools for the User:

- a. **Loss limits:** definition of personalized loss limits (by time elapsed, financial loss, total amount deposited or number of bets), with the possibility of linking such limits to daily, weekly, monthly or other periods;
- b. **Usage alerts and blocks:** option to program, in the Betting System, alerts or usage blocks, depending on the time elapsed in the User session;

c. **Pause:** establishment of pause times, during which the User will be able to access, but will not be able to bet on, their account

For Customers who wish to take a short break from gambling the Company offers a time-out/cooling off facility. Customers can set a time-out on their account through their account function or via live chat or e-mail for different timeframes, which will be further detailed in version 1.2 of this policy as per the implementation schedule of the RG Policy CGA. During this time-out the Customer will have their account closed and all marketing material stopped.

d. **Self-exclusion:** the option for self-exclusion, for a specified period or definitively, in which the User will have his/her account closed and will only be able to register again after the defined period has ended.

Users' Rights. The User's right to freely choose among the possibilities of alerts, prudential limits, pause periods and self-exclusion is guaranteed. The Company, however, in order to fulfill its obligations regarding Responsible Gaming, will make suggestions to Users in accordance with their respective profiles, regardless of request, regarding the adoption of prudential limits associated with alerts or blocking, the carrying out of self-testing or the adoption of a mechanism of self-exclusion.

Increase of limits or suspension of pause periods by the User. Despite the recommendations and suggestions made by the Company, the User may request an increase in the recommended limits and/or suspension of the pauses initially defined in the Betting System. In these cases, the User will be assessed in accordance with the Responsible Gaming criteria set out in this Responsible Gaming Policy. If signs of pathological gaming disorder and/or other problems associated with gaming are not identified, requests to increase limits or suspend pause periods formulated by the User will be implemented. The Company will have at least 24 hours (twenty-four hours) to evaluate.

The self-exclusion period may be for any length of time up to lifetime, but in no event for less than five (5) years. Users will be informed of these mandatory minimum periods when requesting self-exclusion.

The Request for Self-Exclusion form includes a specific waiver and release statement, absolving the regulatory authority, casinos, and their affiliates from claims arising from the self-exclusion process. Users will be required to acknowledge and agree to this statement.

The form also requires the User's signature indicating acknowledgment of a statement confirming their understanding of being a problem gambler, voluntarily requesting exclusion, and the consequences thereof, including forfeiture of winnings during the exclusionary period.

In specific circumstances, a request for self-exclusion may be made by a first-degree relative of the individual, provided there is written consent from the individual for whom exclusion would apply.

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

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

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

- The Customer's account is closed. The Customer can no longer log in.
- The Customer must complete any tournaments that is in-running at the time of the self-exclusion.
- Ante-posts bets will be voided and refunded subject to AML/CFT regulations.¹
- Contributions to progressive jackpots that were made by the Customer through gameplay prior to the self-exclusion request remain, but the Customer is no longer entitled to participate with the jackpot after the self-exclusion is in effect.
- No Advertisement activities shall be conducted towards the Customer.
- Any payment method used by the Customer will be blocked by the Company for future use during the term of the self-exclusion period.

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

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

3.3. Company initiated self-exclusion

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

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

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

¹ Ante post bet bets are those placed in advance of the opening of betting market for that event

4. Reactivation of Account after Self-Exclusion.

Removal from the official self-exclusion list maintained by the regulatory authority shall be automatic upon the expiration of the self-exclusion period chosen by the User (minimum of five years). After this period, the User may contact the Company to inquire about re-accessing the Platform, subject to the Company's internal re-registration procedures and verification that the User's name has been removed from the regulatory authority's self-exclusion list. The request for new registration may be made by the User after at least 24 hours counting from the self-exclusion request made by the User, for internal Company processes, but the official self-exclusion period must be completed.

Upon requesting self-exclusion, the User will no longer receive any advertising material from the Company.

Time and User activity alerts. Regardless of the adoption of limits by the User and the information available in the information panel, the Betting System will have User activity time alerts every 180 (one hundred and eighty) minutes, in pop-up format, indicating: (i) data of the graphic account; (ii) time of use of the Betting System; (iii) financial losses incurred; and (iv) the available financial balance.

4.1. Deposit Limits

In line with the RG Policy CGA, the Company will offer the opportunity to set limits.

The Customer will have the possibility of setting Deposit Limits. This allows the Customer to limit the amount of money that can be deposited within a set timeframe; usually daily, weekly or monthly;

This will be further detailed in version 1.2 of this policy as per the implementation schedule of the RG Policy CGA.

5. RESPONSIBLE GAMBLING SECTION IN THE BETTING SYSTEM

The Company has implemented procedures to monitor the behaviour of Users regarding the risk of addiction and pathological gambling disorders, for the purpose of identifying potentially problematic or pathological gambling patterns. Depending on the signals mapped, if they indicate a high risk of addiction and pathological gambling disorders, the Company may suspend a User's access to the Betting System, as a measure to ensure Responsible Gaming.

As part of the actions implemented by the Company to comply with its obligations under Applicable Law, the Betting System will present a specific section focused on Responsible Gaming, which must be presented to the User in a clear and accessible way.

In the Responsible Gaming Section, the User will have access to:

- a. guidance on how to bet responsibly;
- b. information about the risks associated with betting, which may include addiction, pathological gambling disorders and other problems associated with gambling;
- c. questionnaire for User self-assessment, with questions regarding the risks associated with betting, such as addiction and pathological gambling disorders, in accordance with Annex A;
- d. indication of warning signs for the User's self-monitoring regarding the risk of addiction and pathological gambling disorders;
- e. clear instructions for the User to access preventive mechanisms for addiction and pathological gambling disorders, their history and their current situation on the Platform in terms of time and amounts spent on betting; and
- f. if Users have any questions or concerns, they can easily access the support chat 24 hours a day, 7 days a week, in English, directly on the Platform. This instant support channel allows Users to promptly seek assistance and resolve any queries or issues they may encounter.

Physical modality. In the event of activity carried out in physical mode, the Company will guarantee the User:

- a. access to in-person service channels; and
- b. information about Responsible Gaming in its establishments in a visual and easy-to-read format.

The User will be assured of his/her free and informed choice in all mechanisms offered by the Company on its Platform and/or Betting System, so that no devices will be used that pose difficulties for the User to exercise his/her rights, such as, but without limited to, designs of technological products that may delay the User's free choice.

5.1. Identification of the Problem Gambling Patterns

The Company applies at least two methods of identifying signs of problematic User gambling patterns:

- a. **Communication made by the User:** the User can inform the Customer Service team by email, telephone contact or through the chat function integrated into the Platform about the negative impact of play on your well-being; or
- b. **Review by the Responsible Gaming service team:** when (1) the Customer Service area, during communication with Users, identifies potential problem players, in the event that their chats or calls demonstrate any sign of addictive behavior; and/or (2) objective User

gaming patterns that lead to potential risks of addiction, pathological gaming disorders and other problems associated with gaming are assessed.

Users' Behavior. To define behavioral parameters that potentially indicate signs of pathological gaming disorder and other problems associated with games in Users, which can be evaluated by the responsible teams, the example list suggested in Annex B.

The behaviors mentioned in Annex B are just examples, without prejudice to others that may be verified to define the User's problematic gaming patterns.

Game patterns. Other objective aspects may indicate signs of addiction, pathological gaming disorders and other problems associated with gaming, such as:

a. session time(s); b. total amount bet; and c. gains and losses.

Once the identification of a problem gambler is done through any of the means/triggers (based on Annex B or the User's playing patterns, for example), the Customer Support Team or the area dedicated to Responsible Gaming will direct such User to information about safer gambling and/or will suggest appropriate gambling management tools.

Support channels. The Customer Support team shall also refer the User to sources of help and specialist support from organizations which deal with advice and treatment for problem gambling.

5.2. Communication with Problem and Compulsive Gamblers

The Company recognizes the fundamental role of effective communication with Users who demonstrate problematic and/or compulsive gambling patterns, in preserving a Responsible Gaming environment. If there are concerns about risks of addiction, pathological gambling disorders and/or other problems associated with games, the responsible teams must review a User's account and report it to the Customer Service Office.

The Customer Service Office should consider whether the Customer Service area or the area dedicated to Responsible Gaming should contact the User. If it is decided to contact the User, contact may be made via email or by phone/WhatsApp, asking the User directly if he/she is satisfied with his/her gaming level and if he/she has read the Responsible Gaming page and is aware of the facts related to the game.

If the User cannot be contacted or a satisfactory response is not received, the User's account will be suspended until the User contacts and confirms that he/she is within the limits of Responsible Gaming.

Involuntary Exclusion. In cases where a self-excluded person violates the terms of their self-exclusion agreement, or if the Company identifies severe problematic gambling behavior that warrants intervention, the Company may report such instances to the relevant regulatory authority. The regulatory authority may then initiate a process to place the individual on the involuntary exclusion list for a period not exceeding five (5) years. This process includes written notification to the individual and an opportunity for a hearing within 14 days.

5.3. Duplicate Accounts

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

5.4. Communications regarding Responsible Gaming

In addition to the measures set out in this Responsible Gaming Policy, the Company will maintain continuous and organized communication with its Users registered on its Platform, to alert them about Responsible Gaming, the risks of addiction and pathological gambling disorders, presenting forms of prevention and suggesting options for treatment, complying with the provisions of Applicable Law.

The Company shall engage in responsible advertising. According to the LOK, The Company must ensure that its marketing and advertising activities, including the offering of bonuses:

- do not encourage excessive gaming.
- are not misleading, thus f.e. do not portray gaming as an investment, misrepresent skills vs games of chance as mentioned in the CGA RG Policy.
- do not target Vulnerable persons.

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

5.5. Bonus conditions

As bonuses are regarded by the CGA as advertisement activities, they fall under responsible advertisement conditions under the LOK and the CGA RG Policy.

Therefore, the Company will communicate to the Customer the terms and conditions of any bonus and/or promotion clearly. Furthermore, the Company is committed to not use any bonus to encourage excessive gaming.

5.6. Third party responsibility

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

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

6. TRAINING

Interaction with Users. The Company will organize, promote and/or continuously carry out training and qualification programs for Professionals and Partners, in particular, but not limited to, the areas of Customer Service and Responsible Gaming, so that they can interact directly with Users and ensure that they understand the problems associated with addiction and pathological gambling disorders and know how to correctly guide Users regarding Responsible Gaming.

Responsible Gaming Training. The Company will organize, promote, and continuously conduct training and qualification programs for all new employees, and bi-annual re-training for all employees who directly interact with gaming patrons in gaming areas. This training shall, at a minimum, consist of information concerning the nature of problem gambling, the procedures for requesting self-exclusion or imposing an involuntary exclusion, and assisting patrons in obtaining information about problem gambling programs and support organizations.

The training will also be aimed at Administrators, Professionals and Partners and any third parties who have and/or will have a relationship with the Company with the aim of making them aware of the precepts of Responsible Gaming, in particular regarding the individual and collective negative externalities of activity and to ensure economic exploitation by Society that is socially responsible and ethical.

7. EDUCATIONAL ACTIONS AND CAMPAIGNS

As part of the Responsible Gaming Policy, the Company is committed to promoting Users' awareness regarding the risks of addiction and pathological gambling disorders, and may:

- a. collaborate with educational campaigns that are promoted by the betting sector and aimed at general public and specific groups at risk of addiction and pathological gambling disorders; and
- b. carry out its own educational actions and campaigns aimed at its potential consumer audience.

In addition to digital campaigns, the Company commits to displaying written materials concerning the nature and symptoms of problem gambling, the procedure for self-exclusion (including how to obtain the Request for Self-Exclusion form), the telephone number of the Fundashon pa Maneho di Adikshon, and the criteria for involuntary exclusion. These materials will be prominently displayed at relevant physical locations, such as entrances, exits, and gaming areas, as applicable.

All advertising and marketing materials targeting residents of Curaçao will include a responsible gaming message that has been approved by the relevant regulatory authority.

8. AGE VERIFICATION AND PROTECTION OF CHILDREN AND ADOLESCENTS

The Company prohibits children and adolescents from accessing its Platform and Betting System where gambling services are provided, in order to prevent underage individuals from registering and potentially developing gambling addiction.

To enforce this policy, the Company employs various preventive measures, which includes, without limitation:

- a. the Platform and the Betting System, as the case may be, prompts Users to confirm they are over 18 years old, with the registration process requiring Users to provide their Personal ID number and their birth date, ensuring they are of legal age;
- b. clear information regarding the prohibition of gambling for persons under 18 years old is included in the Platform, the Betting System and in applicable Terms and Conditions;
- c. the identification of the User must be carried out as part of the KYC process and supporting documents to be provided to validate it, as per the criteria set forth in the Company's other policies and Applicable Law;
- d. the Company regularly reviews its age verification system and implements all reasonable improvements that may be made as technology advances and as information improves;
- e. ensure that Professionals and Partners receive appropriate training in the use of the Company's age verification procedures;
- f. the prohibition for minors to participate in gambling activities (indicated by the logo 18+) is prominently displayed on the homepage and on all advertisements and relevant pages of the Company.

Additionally, the Company undertakes measures to ensure its services are not appealing to children and adolescents, such as (without prejudice to other measures provided for in the Company's policies and Applicable Law):

- a. **Content Design:** Games and promotional materials are designed to not be attractive to minors, refraining from using specific graphics, logos, animals, or messages targeting underage individuals, observing the other guidelines of the Company's policies and Applicable Law; and
 - b. **Content Verification:** Marketing teams verify game content and promotional materials before deployment to ensure they do not appeal to minors.
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9. GOVERNANCE

The following areas of the Company will play specific roles for Responsible Gaming purposes, without prejudice to the actions of the Company's Administrators, its Professionals and Partners and by the other areas and departments of the Company:

Integrity and Compliance area; b. Consumer Support area; c. area dedicated to Responsible Gaming; and d. Human Resources and People Management area.

9.1. Roles and Responsibilities

The Company's areas defined in this section will have the following responsibilities for complying with the terms and conditions set out in this Responsible Gaming Policy and in the Applicable Law:

Integrity and Compliance Area a. act effectively for the adoption by the Company of internal procedures and controls, to comply with the provisions of this Responsible Gaming Policy;

b. promote the content of the Responsible Gaming Policy to the Company's Administrators, Professionals and Partners, at a level of detail compatible with the functions performed by Administrators, Professionals and Partners; and

c. promote KYC policies, manuals and procedures to comply with the Responsible Gaming Policy, in particular regarding the prohibition of access by children and adolescents and Persons Prohibited from Gambling to the Platform and the Gaming System.

d. Ensure the availability of the prescribed Request for Self-Exclusion Form to all patrons, as required by the relevant regulatory authority.

e. Designate a specific contact person(s) responsible for liaising with the relevant regulatory authority regarding self-exclusion and involuntary exclusion procedures, including the receipt and maintenance of exclusion lists and all related communications.

f. Utilize player tracking systems and other electronic means, including cross-referencing all taxable patron winnings against the self-exclusion and involuntary exclusion lists, to effectively monitor and prevent excluded persons from participating in gaming activities.

g. Upon discovery of a self-excluded or involuntarily excluded person within the casino premises, the Company shall immediately eject such person and notify the relevant regulatory authority of the breach. Furthermore, the Company shall determine how access was gained and implement measures to prevent future occurrences. Crucially, any winnings attributable to the excluded person during the breach shall be retained by the Company and, after withholding appropriate taxes, donated to the relevant regulatory authority. A detailed report of such incidents, including the amount of winnings forfeited, shall be prepared and forwarded to the regulatory authority within five (5) days of the discovery of the breach.

- h. The Company commits to submitting its Responsible Gaming procedures to the relevant regulatory authority for written approval within the stipulated timeframe and to submitting any amendments at least fourteen (14) days prior to their implementation.

Consumer Support area a. identify, during communication with Users or third parties, potential problem gamblers, in the event that their chats or calls show any sign of addictive behavior;

identify objective User gaming patterns that lead to potential risks of addiction, pathological gaming disorders and other problems associated with gaming;

c. communicate to the area dedicated to Responsible Gaming regarding the identifications carried out as per the items above;

d. offer support to the area dedicated to Responsible Gaming for contact with Users who have been identified as having tendencies towards gambling addiction, pathological gambling disorders and other problems associated with gambling, as advised by the Consumer Service Office;

e. take part in training and capacity building sessions regarding the Responsible Gaming Policy for Administrators, Professionals and Partners of the Company;

f. implement gaming controls defined by Users; and

g. support the area dedicated to Responsible Gaming in whatever is necessary to implement educational actions and campaigns on behalf of the Company, in compliance with Applicable Law.

h. Establish clear procedures for employees to immediately notify designated personnel and regulatory inspectors (verbally if present, or via email and postal mail) upon identification of a self-excluded or involuntarily excluded person present in the casino premises.

i. Ensure that self-excluded or involuntarily excluded persons are denied casino credit, check-cashing privileges, player club memberships, complimentary goods and services, junket participation, and other similar benefits.

The Customer Service Office will specifically be responsible for the following

activities: a. approve communication by the Responsible Gaming area with Users who have gambling behaviors or patterns identified by the Consumer Service area;

b. manage the teams responsible for activities, controls and procedures to protect Responsible Gaming;

c. coordinate training and capacity building sessions regarding the Responsible Gaming Policy for Administrators, Professionals and Partners of the Company, when necessary;

d. approve the contents of the Responsible Gaming Policy;

Area dedicated to Responsible Game a. review identifications made by the Customer Service area, during communication with Users or third parties, of potential problem gamblers, in the event that their chats or calls show any sign of addictive behavior;

b. review objective User gaming patterns that lead to potential risks of addiction, pathological gaming disorders and other problems associated with gaming, which have been identified by the Customer Service area;

contact a User who has been identified as having tendencies towards gambling addiction, pathological gambling disorders and other problems associated with gambling, as advised by the Consumer Service Office;

d. organize training and training regarding the Responsible Gaming Policy for Administrators, Professionals and Partners of the Company, as determined in this Responsible Gaming Policy;

e. support the Customer Service area in whatever is necessary for the implementation of gaming controls by Users; and

f. organize and implement educational actions and campaigns on behalf of the Company, in compliance with Applicable Law.

g. Implement robust systems to ensure that self-excluded or involuntarily excluded persons do not receive any direct marketing, promotional materials, or solicitations related to gaming activities from the Company or its affiliates.

Human Resources and People Management area a. implement the sanctions and penalties provided for in this Responsible Gaming Policy for Administrators, Professionals and Partners or in the Company's other disciplinary measures policies, when applicable; and

b. promote and take part in training and capacity building sessions regarding the Responsible Gaming Policy for Administrators, Professionals and Partners of the Company, when necessary.

9.2. Responsibility of other Company's Administrators, Professionals and Partners

The Company's other Administrators, Professionals and Partners will have the following responsibilities for complying with the terms and conditions set out in this Responsible Gaming Policy and in Applicable Law:

a. comply with what is defined in this Responsible Gaming Policy and the Applicable Law;

b. actively participate in all training involving Responsible Gaming promoted by the Company; and

c. communicate and report to the responsible areas any indication of User behavior that is not in accordance with the precepts of Responsible Gaming.

10. SANCTIONS AND PENALTIES

The violation of the terms set out in this Responsible Gaming Policy and/or Applicable Law by the Company's Administrators, Professionals and Partners will be subject to the following penalties and sanctions, which will be applied by the responsible areas of the Company according to the severity of the occurrence: (i) verbal warning and/or writing; (ii) suspension;

(iii) dismissal without cause; (iv) termination of the services rendering agreement; (v) dismissal for just cause, in accordance with article 482 of the Consolidation of Labor Laws – CLT, without prejudice to the Company's right to claim compensation for any losses suffered, losses and damages, through legal measures.

11. GENERAL PROVISIONS

This Responsible Gaming Policy will come into force on the date of its publication and will remain valid for an indefinite period.

The Responsible Gaming Policy will be reviewed by the Company, at least annually, in accordance with Applicable Law. Any changes will be disclosed to Administrators, Professionals and Partners, Users and other third parties who maintain or will maintain a relationship with the Company.

This document is governed in accordance with Applicable Law and drafted in Portuguese and English. In case of doubts or discrepancies between languages, the Portuguese version shall prevail.

GLOSSARY

Administrators – means the occupants of management or equivalent positions and the members of the Company's board of directors, if any.

Company – means NEXTGATE N.V.

Jogo Responsável (Responsible Gaming) – means the set of rules, practices and activities aimed, in the context of the fixed-odds lottery modality, at ensuring: a) healthy and socially responsible economic exploitation, promotion and advertising of this modality; and b) prevention and mitigation of individual or collective harm resulting from the activity, which includes (1) negative consequences to the User's mental health due to addiction, compulsion, mania or any disorder associated with gambling or betting, such as pathological gambling or abusive; (2) negative consequences for the User's physical health; (3) violations of consumer rights, especially associated with financial, debt and over-indebtedness problems; and (4) social problems.

KYC – means “Know Your Client” procedures.

Legislação Aplicável (Applicable Law) – means all applicable provisions of all (a) constitutions, treaties, statutes, laws, codes, rules, regulations, ordinances and orders of any governmental authority and (b) orders, writs, rights, privileges, qualifications, franchises, decisions, approvals, authorizations, injunctions, judgments, directives, awards, determinations and decrees of or agreements with any governmental authority in the Federative Republic of Brazil, which includes, but is not limited to, the Legislation for Reference.

MF – means the Ministry of Finance.

Pessoas Proibidas de Apostar (Persons Prohibited from Betting) – mean the people indicated in Article 8 of Ordinance No. 1,231/2024, namely: I - under eighteen years of age; II - owner, administrator, director, person with significant influence, manager or employee of the Company; III - public agent with duties directly related to the regulation, control and supervision of activity within the scope of the federative entity within whose staff he exercises his powers; IV - person who has or may have access to computerized fixed-odd betting lottery systems; V - person who has or may have any influence on the outcome of a real sports-themed event subject to a fixed-odd betting lottery, including: a) person who holds the position of sports director, sports coach, coach and member of a technical committee; b) sports referee, sports referee assistant, or equivalent, sports entrepreneur, agent or proxy for athletes and coaches, coach or member of a technical committee; c) member of the administrative or supervisory body of the administrative entity of a competition or sporting event organizer; and d) athlete participating in competitions organized by entities forming part of the National Sports System; VI - person diagnosed with ludopathy by report from a qualified mental health professional; and VII - people prevented from betting by specific administrative or judicial decision, when formally notified.

Personal ID – means a unique identification number assigned to individuals for official purposes.

Plataforma (Platform) – means the Company's electronic channel integrated into the betting system used to offer sports betting and online games to bettors.

Políticade Jogo Responsável (Responsible Gaming Policy) – means this policy.

Profissionais e Parceiros (Professionals and Partners) – means employees, interns, partners, suppliers and outsourced service providers who maintain or will maintain a relationship with the Company.

Sistema de Apostas (Betting System) – means the computerized system managed and made available by operators to bettors that enables Users to register, manage their virtual wallets and other functionalities necessary for the management, operation and marketing of fixed-odd bets.

Usuário(s) (User(s)) – means bettors (individuals who place bets) and users (individuals registered on the Platform, regardless of whether they have placed the bet) of the Platform.

ANNEX A – USER SELF-ASSESSMENT QUESTIONNAIRE

The following 20 questions are those used by Gamblers Anonymous and available at <https://gamblersanonymous.org/ga/content/20-questions>:

1. Did you ever lose time from work due to gambling?
2. Has gambling ever made your home life unhappy?
3. Did gambling affect your reputation?
4. Have you ever felt remorse after gambling?
5. Did you ever gamble to get money with which to pay debts or otherwise solve financial difficulties?
6. Did gambling cause a decrease in your ambition or efficiency?
7. After losing did you feel you must return as soon as possible and win back your losses?
8. After a win did you have a strong urge to return and win more?
9. Did you often gamble until your last Real was gone?
10. Did you ever borrow to finance your gambling?
11. Have you ever sold anything to finance gambling?
12. Were you reluctant to use "gambling money" for normal expenditures?
13. Did gambling make you careless of the welfare of yourself or your family?
14. Did you ever gamble longer than you had planned?
15. Have you ever gambled to escape worry or trouble?
16. Have you ever committed, or considered committing, an illegal act to finance gambling?
17. Did gambling cause you to have difficulty in sleeping?
18. Do arguments, disappointments or frustrations create within you an urge to gamble?
19. Did you ever have an urge to celebrate any good fortune by a few hours of gambling?
20. Have you ever considered self-destruction or suicide as a result of your gambling?

The more "YES" answers the User gives, the greater the signs of risk of addiction, pathological gambling disorders and other problems associated with gambling.

In this case, the Customer Service and/or Responsible Gaming team must implement the measures provided for in this Responsible Gaming Policy to protect the User.

ANNEX B – LIST WITH EXAMPLES OF BEHAVIORS FOR DEFINING PARAMETERS FOR SIGNS OF PATHOLOGICAL GAMING DISORDER AND OTHER PROBLEMS ASSOCIATED WITH GAMING IN USERS

a. User's aggressive communication; b. User mentions that others ever criticized his/her gambling; c. arguments, frustrations or disappointments make a User to want to gamble; d. User gambles alone for long periods; e. User gambles to escape from a boring or unhappy life; f. User stays away from work or studies to gamble; g. User lies to cover up the amount of money or time spent gambling; h. User steals or borrows in order to keep gambling; i.

User lost interest in his/her family, friends or pastimes due to gambling; j. User feels depressed or even suicidal because of gambling; k. User informs that he/she feels his/her gambling spend is out of control; l. family and friends inform Customer Support area and/or the area dedicated to Responsible Gaming about people that they are concerned about; m. significant periods of time engaged in gambling activity; n. seeing gambling as a way to 'make money'; o. paranoid belief that his/her gambling losses are the result of the game being 'fixed' or 'rigged'.

Final Disclaimer: I am an AI model and this document has been generated based on the instructions provided, incorporating the analysis and suggestions for compliance. This is not legal advice, and NEXTGATE N.V. should consult with legal professionals to ensure full compliance with all applicable laws and regulations. The implementation of these policies may require significant operational adjustments.
