

GOLDEN FROG N.V

Responsible Gaming Policy

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1. Introduction

At GOLDEN FROG N.V we support Responsible gaming by providing users a range easy to use and find self-service Responsible Gaming tools, maintaining a comprehensive Responsible Gaming page with valuable resources, and actively reviewing accounts that may raise concerns to ensure player safety and well-being and in accordance with Article 5.3 of the National Ordinance on Games of Chance (LOK) and the requirements of the Curaçao Gaming Authority (CGA).

2. Player Responsible Gaming Tools

We offer tools to help players manage their gambling effectively

2.1 Deposit Limits

Players can set an amount they can deposit on a daily, weekly or monthly basis.

2.2 Reality Checks

Players get pop ups of how long they have time they spent online.

3. Adjusting Limits

- **Setting New Limits or Decreasing Limits:** Changes take effect immediately.
- **Increasing or Removing Limits:** A 24-hour cooling-off period applies.

Limits can be adjusted anytime in the **LIMITS/RG** section of the account or by contacting our support team

4. Self-Exclusion Options

To assist those who need a break from gambling, we provide several self-exclusion options:

4.1 Time-Out Period & Self Exclusion

- Players can choose a specific time-out period ranging from 24 hours, 7 days, 30 days or 90 days via the LIMITS/RG section or by contacting our support team.
- Players can choose a specific Self Exclusion period of 1 year or Permanent by contacting the Customer Support Team if assistance is needed or longer periods.
- A Permanent Self-Exclusion cannot be revoked.
- A Self-Exclusion applies across all current and future brands owned by Golden Frog N.V
- Registered Payment methods are blocked to prevent future use for Self-Excluded players regardless of the amount of time of their Self-exclusion, including Permanent Self-Exclusion.

4.2 Account Status During Time-Out Period & Self-Exclusion

- The player's account balance remains intact, and withdrawals can be requested through support during a Time-Out Period.
- Self-Excluded accounts with real money balance or/and any pending withdrawals will be processed and paid within 2 working days, standard KYC and AML procedures may apply.
- No marketing communications will be sent during this period.
- Players are sent an email informing them of their Self Exclusion suggesting they should Self-Exclude with other Operators and provided with Help Organization Links.

4.3 Reopening Accounts

Players can reactivate their account after a self-exclusion period has elapsed, by contacting customer support via email. The account becomes active after observing a 7 day cool off period.

Accounts are only reopened after passing a Personal Gambling Severity Index (PSGI) test.

4.4 Compliance with Exclusion

Creating new accounts to bypass self-exclusion is prohibited. Such accounts will be closed, and losses incurred will remain the players responsibility.

4.5 Player Information Accessibility

Players can obtain information about our Responsible Gaming Feature and Self Exclusion on our website via:

- The Responsible Gaming Page
- Responsible Gaming Interaction Email
- Self-Exclusion Policy on the Home Page
- Under the Responsible Gaming of our Terms & Conditions
- Gambling can be Harmful Message including Underage Gambling is prohibited with a link to Responsible Gaming Page in footer
- Dynamic Seal
- 18+ Logo
- Help Organizations Logos with external links
- License Entity Name, Address and CGA License number in Footer

5. Advertising & Marketing

All advertising will include messages promoting responsible gambling, such as:

- *Gambling can be addictive, please Play Responsibly. For help visit our Responsible Gambling page. Underage gambling is an offense*
- Tools such as betting limits will be highlighted in promotional materials from time to time

5.1 Marketing Opt-Out for Responsible Gambling Measures

- **Time Out:** Players who have opted for a *Time Out* (temporary suspension of player account) will be automatically removed from all marketing and promotional communications for the duration of their Time Out.
- **Self-Exclusion:** Players observing a *Self-Exclusion* will also be automatically removed from all marketing and promotional communications for the duration of their Self-Exclusion period.
- **Permanent Self-Exclusion:** Players observing a *Permanent Self-Exclusion* will have their details permanently removed from the marketing database to ensure no further communication.

5.2 Email Communication Standards

All email communications sent by GOLDEN FROG N.V must adhere to the following requirements:

- **Company Footer:** Every email must include a footer that contains:
 - A Responsible Gaming Disclaimer
 - A Curaçao Gaming Authority Dynamic Seal
 - Company Details
 - Help Organization Logos
 - 18+ Logo
 - The terms and conditions (*T&Cs*) for any offer mentioned in the email.
 - An unsubscribe option allowing recipients to opt out of future communications easily.
- **Accuracy:** All email content must align with this Advertising Policy, providing accurate and non-misleading information.
- **Consent:** Emails must only be sent to individuals who have explicitly opted in to receive marketing communications.

6. Account Review

We use the following analysis to determine their involvement in gaming to help determine the gameplay indicators, behavioural indicators & determine the risk level.

- Transactional - Payment methods:
 - Determine if it is Debit or Credit.
 - Number of payment methods used.
- Deposits/ Withdrawals
 - Net losses/ profit over the number of active months.
 - Deposits following withdrawals.
 - Failed deposits: declined/ no funds/ no system error related.
 - Cancelled withdrawals.
 - Deposits per session.
- Game Play & Gameplay patterns:
 - Stakes
 - Session's activity
 - Prolonged gaming by game rounds
 - Types of games
 - Deposit patterns
- RG Tools Usage
 - Limit Changes
 - Session limits
 - Take a break.
 - Self- exclusion
- Behavioural - Communications:
 - Live chats transcripts
 - Emails

7. Responsible Gaming Training

- All new employees must complete a series of online modules on our iGaming Academy.
- Employees that hold a player facing role with get extensive quarterly in-house Responsible Gaming training conducted by the Head of Responsible Gaming or Responsible Gaming Specialist.
- Annual Responsible Gaming training is given to employees with player facing roles along with management by an outsourced training partners which specialize in Safer Gambling and courses.

8. Right to Intervene

We reserve the right to block or close accounts and return real balances if continued use of our services is deemed harmful to a player's well-being.

9. Underage Gambling

- Gambling is prohibited for individuals under 18.
- Players will be requested to enter their Date of Birth upon registration and declare that they are of legal age, over 18 years old.
- Full KYC is requested if any accounts are suspected to be registered by a minor.
- Any underage activity is maintained on records and their outcomes. These records must be kept indefinitely and readily available for regulatory review.
- Accounts created by underage users will be closed immediately and will be blacklisted to prevent creation of future accounts and payment method used will be blocked.
- Deposits will be refunded within 24 hours to the original payment method when possible after identifying the incident. The deposits will remain on the account until refunded.
- Any winnings will be forfeited.

10. Self-Exclusion Register

All Self-Excluded player details are logged on the register which is kept indefinitely and includes:

- Player Name
- Username
- Email Address
- Phone Number
- From & Expiry Date
- Channel – Front End or Via other means

11. Support for Problem Gambling

We are committed to helping those struggling with gambling addiction. Professional resources on our Responsible Gaming Page include:

- Gamblers Anonymous
- GamCare
- Quit Gamble
- Target Market Local Organizations

12. Additional Tips for Responsible Gambling

To further support responsible gambling, we recommend the following measures to players via our Responsible Gaming Page and Email Communications:

12.1 Device Blockers

Consider using device-blocking software to limit access to gambling websites. Popular options include:

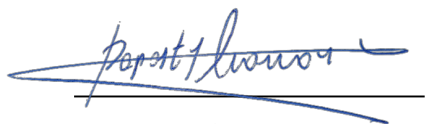
- Gamblock
- Betblocker

12.2 Self-Assessment - Take the Test

The GamCare Self-Assessment Test is available for players via our Responsible Gaming Page and Email Communications

- The test includes a series of statements to evaluate, where you score each statement on a scale of 1-10 based on how much it applies to the user.
- The results will provide a detailed breakdown of how gambling may be impacting the user's life and offer personalized recommendations for the next steps.

13. Signatory Page



Georgios Papastyliaou

Responsible Gaming Officer

GOLDEN FROG N.V