

Responsible Gaming Policy
Lowell & Pruitt N.V.
("the Company")

Ver. 1.1. dated 30 Sept, 2025

Gambling can be exciting, interesting and good fun. Sports betting, online casino, games and poker are played by millions of people worldwide who love entertainment. Unfortunately, this activity like many others can create addiction, and that's why we are committed to the promotion of responsible gambling and we take all the necessary measures to prevent any form of abuse and to create a responsible and healthy gambling environment. The Company acknowledges that for some people, gambling can have a negative impact on their life and therefore the Company has developed this Responsible Gaming Procedure (hereafter: the '**Policy**') which outlines certain practices adopted by us when providing services to our customers.

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

The Company has appointed a designated Responsible Gaming person, who is responsible for implementing and enforcing the Policy. Furthermore, this designated person shall be the point of reference regarding this Policy and its related requirements. As part of the Company's problem gambling initiative all related staff receive responsible gambling training as part of the induction process and annually thereafter.

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.

RG Policy

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 player 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 players to refer to one or more gambling support organizations;

The Company 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 identification 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:** We 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 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.

Underage gambling

Participation in gambling activities is strictly limited to individuals who are 18 years of age or older. Underage gambling is strictly prohibited and will not be tolerated under any circumstances.

We are committed to promoting a safe, responsible, and legally compliant gaming environment. As part of this commitment, we take the issue of underage access extremely seriously and are dedicated to preventing minors from participating in any gambling-related activities on our platform.

By accessing and using our services, users expressly acknowledge and confirm that they are at least 18 years of age. Any attempt to misrepresent age or provide false information during the registration process constitutes a breach of our terms and conditions.

If we become aware that an account has been opened or accessed by a minor, we reserve the right to take immediate action. This includes the immediate closure of the account, the forfeiture of any winnings, and other actions subject to applicable legal requirements. We will clearly communicate the reason for the account closure to the minor.

To support our efforts in preventing underage gambling and ensuring compliance with relevant regulations, all users may be required to submit valid proof of age. Verification includes a valid government-issued photo ID, such as a passport, national ID card, or driver's license - once thresholds set out in our Anti Money Laundry Policy are reached. Records of all age verification processes and their outcomes are maintained, in accordance with relevant regulations.

We are continuously working toward implementing additional measures to detect and prevent underage access and ensure that our platform remains a safe environment for all eligible users.

Behavior tracking

The Company monitors customer activity to identify potential gambling problems. Behavior tracking will be done, amongst other elements, on the following factors:

- Deposit and wagering frequency;
- Repeated failed transactions due to insufficient funds;
- Reversing withdrawals;
- Inexplicable extended play sessions;
- Frequent changing to Responsible Gaming tools;
- Unreasonable increased communication with customer support;
- Attempts to open multiple accounts to bypass deposits or loss limits.

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

Self-assessment

We encourage all players to regularly reflect on their gambling habits to ensure that their gaming remains safe and within healthy limits. To support this, we provide access to self-assessment tools designed to help users identify potential signs of problem gambling and make informed decisions about their activity.

One widely recognized self-assessment is the 20-question quiz provided by Gamblers Anonymous, available at: <https://gamblersanonymous.org/20-questions/>.

This questionnaire can help players recognize behaviors that may indicate a gambling problem.

In addition, players may consider using scientifically recognized screening tools, such as the CAGE Questionnaire (Adapted for Gambling). This simple four-question tool can provide valuable insight:

1. C – Cut Down: Have you ever felt you should cut down on your gambling?
2. A – Annoyed: Have others annoyed you by criticizing your gambling?
3. G – Guilty: Have you ever felt guilty about your gambling?
4. E – Eye-Opener: Have you ever gambled first thing in the morning to feel better or recover from losses?

Interpreting the Results

- 0 “Yes” Answers: Low risk of gambling-related harm
- 1 “Yes” Answer: Moderate risk; further reflection is advised
- 2 or More “Yes” Answers: High risk; professional support and responsible gambling tools are strongly recommended

If any signs of problematic behavior are identified through these assessments, players are strongly encouraged to explore the responsible gambling tools available on our platform or seek support from professional organizations.

Monitoring and Intervention

We actively monitor and analyze player behavior using multiple indicators, such as deposit and wagering frequency, reversed withdrawals, and unusually long play sessions. If a player shows signs of signs of gambling addiction, we may offer self-limitation tools or, in more severe cases, restrict access and close the account. This approach supports early identification of risky behavior and helps reduce potential harm.

Available restrictive measures

If you feel that online casino games will or already have become a problem for you, we strongly suggest that you use the following mechanisms that are available and can be accessed by contacting our customer support via chat or via email:

- self-exclusion;
- cool down period;
- financial limits.

Self-Exclusion

If you wish to be self-excluded from our website, please have a look at our Self-exclusion policy.

Time out/ Cool Down Period

If you need a temporary break from gambling on the website, you can ask us for a cool down period. Once a cool down period is activated, the player’s gameplay will be temporarily locked. After the selected cool down period has ended, you will automatically regain full access to your account and may resume gaming as usual.

Customers can set a time-out on their account 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.

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.

Duplicate Accounts

The company will take measures in order to prevent players 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.

Training

Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to all staff. All related staff are provided with induction training on responsible gambling, and annually thereafter.

To ensure best practice, ad-hoc training may also be provided to employees to discuss findings following evaluations. Further details on this topic will be implemented in version 1.3 in line with the implementation schedule of RG Policy CGA

Parental Controls

There are a number of third-party applications available that parents or guardians can use to monitor or restrict the use of their computer's access to the Internet. These include:

Net Nanny (www.netnanny.com) is a filtering software that protects children from inappropriate content on the Internet.

Make sure no minors have access to your player account. For most computers, it is possible to have a password control so they cannot be accessed without user verification. It is also possible to use specific protection software that allows you to prevent minors in your household to access gambling websites.

Internet Filtering Tools

We recommend considering third-party software that can help limit access to gambling websites. There are several tools available globally, some of which are free and others are paid, that can assist with website and gambling site blocking.

Examples of such tools include:

BetBlocker – betblocker.org
GamBlock – gamblock.com

These tools can be useful for managing and restricting access to gambling sites, helping to promote a safer online environment.

Information Visibility

The Company ensures that players can easily access responsible gaming information by:

- **Visible Links:** Our homepage displays a link to the responsible gaming policy, tools, and contacts. These links are also included in the footer of the homepage on our website
- **Terms and Conditions:** Clear references to our terms and conditions, including the prohibition of underage gambling, are provided. The terms and conditions are easily accessible and written in plain language;
- **Responsible Gaming Organizations:** Links to organizations that offer support for gambling addiction are available. These include local and international organizations, as per this policy.
- **Footer information:** In line with Curaçao Gaming Authority's policy, our website footer includes the following required elements: A visual notice against underage gambling; Our company name and registered address; Our official CGA license number; A statement confirming regulatory oversight of the Licensee's operations by the CGA; A link to the Responsible Gaming section; The CGA digital seal.

No credit offering for wagering

As a general principle, in accordance with applicable regulations, no credit can be offered to players for the purpose of wagering.

Gambling History

A registered participant's gambling history is available, including all deposits and withdrawals. This information allows a Customer to monitor their gambling spend. A full statement can be found within the Customer Account or can be requested by contacting the customer support team.

Contact and assistance

There are organizations that provide professional assistance to persons who are affected by gambling problems:

Gambling Therapy www.gamblingtherapy.org

Gamblers Anonymous www.gamblersanonymous.org

GamCare www.gamcare.org.uk

Gamble Aware www.gambleaware.co.uk

If you have any questions or concerns regarding responsible gaming, please feel free to contact us via chat or at email.

Language Availability

The Responsible Gaming section is made available in English and in the official language(s) of the target market. In the event of any discrepancies or inconsistencies between translations, the English version shall prevail.

Advertising and Promotions

The Company makes sure that advertising or promotions comply with all applicable laws associated to the advertising and promotion of gambling products. Such advertising and promotions will be rolled out in a socially responsible manner.

Any player who is currently under a period of self-exclusion (cooling off) or indeed a permanent exclusion due to problem gambling, shall be removed from all marketing correspondence lists. As such, no marketing or promotional materials shall be sent to excluded players.

Furthermore, no marketing or promotional materials shall knowingly and deliberately target vulnerable people, as per the definition of clause 1.1 h of the LOK.

Our marketing and promotional activities follow responsible gambling guidelines and adhere to the following principles:

- No Portrayal of Gambling as an Investment - Advertising must not promote gambling as a way to achieve financial success or solve financial difficulties;
- No Misrepresentation of Skill vs. Chance - Marketing must not suggest that skill can influence the outcome of games that are purely based on chance;
- No Emotional Manipulation - Advertising must not portray gambling as a substitute for financial, emotional, or mental well-being;
- Marketing materials must not feature minors or depict them engaging with gambling content;
- No Explicit Content - Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion;
- No Encouragement of Unrelated Harmful Behaviors - There must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness;
- Bonus Conditions:
 - 1) Bonuses and promotions must be communicated transparently with clear terms and conditions;
 - 2) Bonuses must not be used to encourage excessive gambling;
- Third Party Involvement:
 - 1) As an operator, we are responsible for materials provided to affiliates, representatives, sponsorships, ambassadors social media influencers, including wordings and visual representations, where the influencers actions and/or statement are paid placement or advertisement;
 - 2) Any contracted third-parties are made aware of the Responsible Gaming Policy and required to adhere to it;
- Responsible Gaming Messaging - All advertising must include a clearly visible responsible gaming message or slogan.

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.

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.

Any Customer who is currently under a period of self-exclusion (cooling off) or a permanent exclusion due to problem gambling, will be removed from all marketing correspondence lists. No marketing or promotional materials is to be sent to excluded Customers.