

KREVETKA B.V. (166108)

RESPONSIBLE GAMING POLICY

March, 2025

Approved by the Board of Directors

March 24, 2025

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1. Definitions

- **Games of Chance** refer to any game where one or more participants wager money or its equivalent in exchange for the opportunity to win prizes of monetary value. The outcome is determined either purely by chance or through a combination of chance and player skill, but without the ability for players to significantly influence the result. Examples include sports betting and poker.
- **LOK** stands for the National Ordinance on Games of Chance in Curaçao, which serves as the primary legal framework regulating gambling activities in the jurisdiction.
- **Marketing, Promotion, and Advertising** encompass all materials, messages, and media used to promote an operator's brand, domain(s), products, or services. This includes, but is not limited to, print media, digital content marketing, online advertising, and social media campaigns.
- **Mandatory Requirements** refer to the core components of a Responsible Gaming policy that all operators must implement. These elements are tailored to the operator's target market and player base to ensure responsible gambling practices.
- **Operator** is an entity holding a B2C gaming license issued by the Curaçao Gaming Control Board (GCB) or a recipient of an Orange Digital Seal "Certificate of Operations", authorizing it to conduct gaming activities.
- **Self-Exclusion** is a process where a player voluntarily restricts themselves from participating in some or all online gambling activities offered by a specific operator. This exclusion should extend across all platforms, domains, and brands operated by the same licensee.
- **Vulnerable Person** is defined under Clause 1.1(h) of the LOK as an individual who falls under any of the following categories:
 1. Under the age of 18.
 2. Lacks or has limited control over their gambling behavior, leading to a risk or actual development of gambling addiction, which could result in harm to themselves or others.
 3. Has been banned from gambling, either through a legal directive or by their own request.
 4. Has been declared bankrupt.

2. Responsible Gaming Policy Overview

Krevetka B.V. (The Company) is committed to fostering a safe, responsible, and fair gaming environment. As a licensed operator under the Curaçao Gaming Control Board (GCB), the license number OGL/2024/937/0857, the company implements comprehensive Responsible Gaming measures to mitigate the risks associated with problem gambling and ensure that gaming remains a form of entertainment rather than a cause of harm.

To meet these obligations, the company:

- Integrates Responsible Gaming principles into all aspects of our business operations.
- Develops and documents a Responsible Gaming Policy that aligns with regulatory expectations.
- Uploads and maintains this policy on the GCB Licensee Portal for regulatory review and approval.
- Regularly assesses and updates its Responsible Gaming measures based on market needs and player behavior.

This policy provides clear tools, support mechanisms, and intervention strategies to help players maintain control over their gambling activity while ensuring regulatory compliance.

3. Responsible Gaming Requirements & Player Protection

To comply with the Curaçao Gaming Control Board (GCB) licensing requirements, Krevetka B.V. implements the following mandatory Responsible Gaming measures:

- Age Verification – Ensuring that all players meet the minimum age requirement through strict identity verification protocols.
- Information Accessibility – Providing clear and transparent responsible gaming information across our platforms.
- Player Self-Assessments – Offering self-evaluation tools to help players assess their gambling behavior.
- Behavior Tracking – Monitoring player activity to detect patterns of problematic gambling behavior.
- Cooling-Off & Self-Exclusion – Enabling players to take temporary breaks or permanently self-exclude from gaming activities.

- Deposit Limits – Allowing players to set financial limits on their deposits to manage responsible spending.
- Training Programs – Educating employees, affiliates, marketing partners, and social media influencers on responsible gaming principles.
- Marketing & Advertising Compliance – Ensuring all marketing strategies align with responsible gaming principles, avoiding targeting minors or vulnerable individuals.

A Responsible Gaming Officer (RGO) will be appointed to oversee the implementation and enforcement of this policy. Until a dedicated RGO is assigned, the Compliance Officer (excluding AML/CFT duties) will assume responsibility.

The Compliance Officer must:

- Conduct an annual review of the Responsible Gaming Policy and its effectiveness.
- Provide a detailed report to the Executive Management Team with policy performance analysis and improvement recommendations.
- Report any policy updates or amendments to the GCB in a timely manner.

At Krevetka B.V., we are committed to protecting vulnerable individuals, promoting responsible gambling, and preventing problem gambling behaviors. To achieve this, we implement the following player protection measures:

- Responsible Gaming Policy & Programs – A comprehensive Responsible Gaming Policy is in place, outlining the measures we take to ensure safe and fair gaming.
- Responsible Gaming Tools & Education – We provide self-assessment tools, deposit limits, cooling-off periods, self-exclusion options, and reality checks, along with educational resources on responsible gambling.
- Behavior Monitoring & Risk Detection – Advanced tracking mechanisms are in place to identify problematic gambling behaviors, enabling proactive intervention when necessary.
- Regulatory Compliance & Reporting – We strictly adhere to GCB regulatory requirements, including regular audits, reporting obligations, and continuous policy updates to maintain industry best practices.

These measures ensure compliance, transparency, and continuous improvement in Responsible Gaming that prioritizes player well-being and regulatory integrity.

4. Player Information & Accessibility

Ensuring players have access to clear and transparent responsible gaming information is a fundamental aspect of Krevetka B.V.'s commitment to responsible gambling. At all times, players must be able to make informed choices and take immediate action when necessary. To achieve this, responsible gaming information is integrated throughout the website and application interface.

Link to **the Responsible Gaming Policy** is prominently displayed on the homepage, ensuring easy access from key sections of the platform. This policy is available in English and other languages relevant to our target markets, allowing all players to fully understand the measures in place. Additionally, players can directly access various responsible gaming tools, such as self-exclusion, cooling-off periods, and deposit limits, enabling them to manage their gambling behavior proactively. To further support players, the homepage also provides clear contact information, allowing them to reach out for responsible gaming assistance via email or live chat.

In line with regulatory requirements, the Responsible Gaming Policy is explicitly referenced within **the Terms & Conditions**, ensuring that players are fully aware of the available tools and how they function. The Terms & Conditions section remains easily accessible and never more than one click away from the homepage, allowing players to review essential responsible gaming guidelines whenever needed.

To reinforce its responsible gaming commitments, Krevetka B.V. ensures that essential information is included in the website's footer. This section clearly states that underage gambling is strictly prohibited and displays the name and registered address of the license holder, along with the official license number issued by the Curaçao Gaming Authority. A statement confirming the regulatory oversight of the GCB is also present, along with a direct link to the Responsible Gaming Policy Statement. Furthermore, the footer contains the GCB's official digital seal, affirming the company's compliance with responsible gaming regulations.

Recognizing the importance of support services for players experiencing gambling-related harm, Krevetka B.V. provides direct links to established gambling addiction support organizations. By implementing these measures, Krevetka B.V. ensures that all players have immediate access to the tools and information necessary to make informed and responsible gambling decisions.

5. Player Age Verification & Control Tools

Krevetka B.V. enforces strict age verification measures to prevent underage gambling and ensure compliance with Curaçao Gaming Control Board (GCB) regulations. Players must confirm they are of legal gambling age (18 or older) before they are allowed to register, deposit, or place wagers on our platform. No exceptions are made, and underage accounts are immediately restricted upon detection.

Age Verification Process

To verify the age of all players, Krevetka B.V. requires:

- Date of birth confirmation during registration, including a declaration that the player is over 18.
- Government-issued ID verification, such as a passport, national identity card, or driver's license, in case KYC or AML milestones are reached by the player; however, if Krevetka B.V. has any doubt of a player's age before the mentioned milestones are reached, ID Verification is to be requested earlier.
- Confirmation of payment method, such as a credit card, where applicable.

If there is any suspicion of underage activity, the account will be suspended until verification is complete. In cases where a player is confirmed to be underage:

- Account access is immediately revoked.
- Any deposited funds are refunded, except where frozen under AML policies.
- All winnings are forfeited, in accordance with regulatory guidelines.
- A formal notification is sent to the minor, explaining the reasons for account closure.

Additional Security Measures

To further enhance age verification accuracy, Krevetka B.V. may utilize:

- Secondary verification methods, including proof of address, selfie verification, and third-party database checks.
- Proactive verification before KYC or AML milestones if there is any doubt about a player's age.
- Record-keeping of all verification attempts, with logs available for regulatory review upon request.

Parental Controls and Internet Filtering

Krevetka B.V. encourages parents and guardians to take preventative measures to protect minors from accessing gambling platforms. Adults should secure their devices, usernames, passwords, and payment details to prevent unauthorized use by minors.

To assist in restricting access to gambling websites, we recommend third-party parental control software, including:

- Net Nanny (www.netnanny.com)
- GamBlock (www.gamblock.com)
- CyberSitter (www.cybersitter.com)

By enforcing these stringent age verification and parental control measures, Krevetka B.V. ensures a safe and legally compliant gaming environment, protecting minors from exposure to gambling activities.

6. Player Self-Assessment

Krevetka B.V. encourages all players to actively monitor their gambling behavior and make informed decisions about their gaming activity. To support responsible play, we provide self-assessment tools that help players determine whether their gambling remains within healthy limits.

Access to Betting and Wagering History

Players can review a detailed record of their betting and wagering history, including transaction timestamps, from the moment their account is opened. By regularly analyzing their gambling patterns, players can evaluate their spending habits and detect any signs of excessive gambling.

Self-Assessment Tools

To further assist players in recognizing potential gambling-related issues, Krevetka B.V. offers scientifically recognized self-assessment self-test and questionnaires.

Players who identify potential problem gambling behaviors through these assessments are encouraged to explore responsible gaming tools such as deposit limits, self-exclusion, and cooling-off periods. Krevetka B.V. also provides links to gambling support organizations, ensuring that players have access to professional help if needed.

By offering self-assessment tools and access to betting history, Krevetka B.V. empowers players to make responsible gaming choices while ensuring compliance with Curaçao Gaming Control Board (GCB) regulations.

7. Player Behaviour Tracking

At Krevetka B.V., we implement active monitoring systems to detect signs of problematic gambling behavior, ensuring compliance with Curaçao Gaming Control Board (GCB) regulations. Through a combination of human oversight and technological tools, we identify at-risk players and intervene where necessary to prevent gambling-related harm.

Monitoring and Identifying At-Risk Players

Our behavior tracking system analyzes player activity in real time, focusing on key indicators that may signal problematic gambling patterns. These include:

- Unusual deposit and wagering frequency, such as sudden increases or erratic betting behavior.
- Use of multiple payment methods to circumvent set limits.
- Repeated withdrawal reversals, where players cancel withdrawal requests multiple times.
- Extended gaming sessions without breaks, which could indicate compulsive gambling.
- Frequent interactions with customer support, particularly requests for bonuses or signs of agitation.
- Repeated adjustments to responsible gaming settings, such as increasing deposit limits or using cooling-off periods excessively.
- Significant spending by players under 25 years old, especially on casino or virtual games.
- Maxing out credit cards and attempting to register additional payment methods.
- Spending patterns that do not align with the player's financial profile.
- Attempts to create multiple accounts to bypass deposit or loss limits.

Player Profiling and Risk Assessment

Krevetka B.V. maintains detailed player profiles with behavioral data points to assess individual risk levels. These profiles are regularly reviewed, and any concerning patterns trigger real-time alerts for further evaluation.

Intervention Strategies for Problem Gambling

When concerning behavior is identified, trained responsible gaming professionals initiate direct player interaction to assess the situation. This communication is logged within the Player Account Management system and includes key indicators of concern and actions taken.

If a player exhibits high-risk behavior, the following responsible gaming interventions may

be applied:

- Imposing deposit limits to reduce financial exposure.
- Temporarily suspending the player's account pending further review.
- Enforcing self-exclusion in extreme cases where problem gambling is evident.

Training and Staff Readiness

Krevetka B.V. ensures that customer support, VIP managers, and responsible gaming teams are trained to handle player interactions professionally and sensitively. Training programs cover:

- Recognizing signs of gambling distress, including agitation, aggression, or financial desperation.
- Engaging in structured and supportive conversations with at-risk players.
- Guiding players toward responsible gaming tools such as deposit limits and self-exclusion.
- Documenting all player interactions to ensure compliance with regulatory reporting obligations.

Escalation Protocol

If problematic behavior is identified, it is immediately escalated to the Compliance Officer or Responsible Gaming Officer, who will determine the appropriate intervention. This may include further restrictions, exclusions, or other responsible gaming measures to safeguard the player.

By combining real-time behavior tracking, staff intervention, and regulatory compliance, Krevetka B.V. ensures that problematic gambling behaviors are identified early and addressed effectively. This approach reinforces our commitment to responsible gaming and player protection while maintaining compliance with GCB guidelines.

8. Cooling Off

Krevetka B.V. provides easily accessible and immediate cooling-off options to allow players to take a break from gambling when needed. This temporary restriction ensures that players can step away from gaming without unnecessary obstacles or delays, promoting responsible gambling habits. If platform adjustments are required to implement this feature technically, Krevetka B.V. will manually facilitate cooling-off requests until a permanent solution is available.

Availability and Accessibility

Players can activate a cooling-off period of 24 hours, 7 days, 1 month, or 3 months, during which their access to gambling is temporarily restricted to specific gaming categories or across all product verticals. This option is clearly displayed on the website and can be activated with a single click, without requiring email communication or operator approval.

Immediate Activation and Restrictions

Once a player selects the cooling-off option, the following measures take effect:

- Players are informed about the difference between a Cooling-Off period and Self-Exclusion, with the option to proceed directly to Self-Exclusion if they require a longer restriction.
- The cooling-off period takes effect immediately, locking the player's account and preventing any gambling activity for the full duration selected.
- Players are given the option to opt out of marketing communications during their cooling-off period to avoid promotional material.

Krevetka B.V. strictly prohibits any actions that discourage players from activating a cooling-off period. This includes:

- Questioning the player's decision or encouraging them to reconsider.
- Delaying activation through unnecessary approvals.
- Offering bonuses or promotions as incentives to continue gambling.

Reactivation and Additional Time-Out Options

At the end of the cooling-off period, the player's account is automatically reactivated, allowing them to resume gambling without additional steps. If a player feels they need further restrictions, they are encouraged to use extended time-out options or consider self-exclusion for longer-term protection.

By ensuring that cooling-off periods are immediate, interference-free, and player-driven, Krevetka B.V. upholds its commitment to responsible gaming and player well-being while maintaining full compliance with Curaçao Gaming Control Board (GCB) regulations.

9. Self-Exclusion

Krevetka B.V. offers a comprehensive self-exclusion program designed to help players regain control over their gambling behavior and prevent further harm. The self-exclusion option is easily accessible, takes effect immediately upon request, and applies across all Krevetka B.V. platforms.

Self-Exclusion Process and Accessibility

Players can activate self-exclusion through a clearly visible option on the website, where they will find:

- A step-by-step guide on how to self-exclude.
- Details on the available self-exclusion durations.
- An explanation of the benefits of self-exclusion, emphasizing its role in responsible gambling and harm prevention.

The self-exclusion process is fully automated and does not require email communication or manual approval. It is designed to be quick and straightforward, ensuring that players can complete their request in 15 minutes or less.

Immediate and Irreversible Action

Once a self-exclusion request is submitted:

- The restriction takes effect immediately, preventing the player from gambling.
- The player's account is locked, blocking access to deposits, wagers, and withdrawals.
- Any known payment methods used by the player are also blocked to prevent circumvention.
- The player's details are recorded in the Self-Exclusion Register, which is maintained for a minimum of seven years beyond the exclusion period.
- A player who self-excludes on Krevetka B.V. is also encouraged to exclude themselves from other gambling sites for added protection.

To prevent players from bypassing restrictions, Krevetka B.V. has measures in place to detect duplicate accounts and block them accordingly.

Self-Exclusion Durations and Restrictions

In accordance with Clause 5.4(2) of the LOK, players may choose a self-exclusion period of:

- 1 year
- 3 years
- 5 years
- 10 years
- Lifetime exclusion

Once a self-exclusion request is activated, it cannot be reversed before the exclusion period ends. Krevetka B.V. strictly prohibits any attempts to discourage self-exclusion, including:

- Questioning the player's decision.
- Offering reassurances to delay the process.
- Providing bonuses or promotions to encourage continued play.

Self-exclusion can apply to specific gaming categories or the entire platform, depending on the player's preference.

Financial and Account Management During Self-Exclusion

When a player self-excludes across all gaming verticals:

- All gambling-related transactions are blocked immediately.
- The player's account is deactivated, restricting further gameplay.
- Any remaining funds (except those frozen under AML policies) are refunded to the original payment method within two business days.
- The player's data is permanently removed from all marketing and promotional lists.

For partial self-exclusion (restricting certain game types but not all), gameplay and wagering are blocked in accordance with the player's selected preferences.

Reactivation and Post-Exclusion Requirements

After the self-exclusion period ends, the player must:

1. Confirm in writing that they wish to reactivate their account.
2. Receive a responsible gaming message reminding them of available safeguards.
3. Be encouraged to complete a self-assessment questionnaire, such as the Gamblers Anonymous 20-Question Quiz.

The player's gaming history remains intact, and their account is restored only under the original credentials, preventing account duplication.

Marketing and Contact Restrictions

During and after the self-exclusion period:

- Krevetka B.V. will not send any promotional materials or gambling incentives.
- The player will not be contacted regarding gambling activities unless legally required (e.g., account security notices).
- Cooling-off periods end automatically, but after self-exclusion, the decision to resume play must be fully initiated by the player.

Compliance and Reporting

Krevetka B.V. documents all self-exclusion requests and interventions in real time. If a self-excluded individual or minor is found gambling, the company will:

- Block the player's account immediately.
- Refund any deposited amounts within two business days, except where frozen under AML policies.
- Submit a detailed report to the GCB within five working days, outlining how the breach occurred and the corrective measures taken.

Operator-Initiated Exclusion

Krevetka B.V. reserves the right to exclude a player as a high-risk intervention measure if:

- The player displays problematic gambling behavior.
- There is evidence of financial distress linked to gambling activity.
- The player is involved in fraudulent or criminal activities on the platform.

All operator-initiated exclusions are formally documented and records are maintained for at least five years. The GCB may request these records at any time.

By implementing a structured and transparent self-exclusion process, Krevetka B.V. ensures strong player protection, regulatory compliance, and a safer gambling environment for all users.

10. Limits

Krevetka B.V. provides customizable deposit limits to help players manage their gambling activity responsibly. These limits allow players to control their spending habits and set financial boundaries that align with their individual gaming preferences.

Deposit Limit Options

Players have the ability to set daily, weekly, or monthly deposit limits, ensuring they maintain control over their gambling expenditure. Once a limit is reached, the player will be unable to deposit additional funds until the specified period resets.

- Stricter limits can be applied at any time, and these changes take effect immediately to enhance player protection.
- Requests to increase a deposit limit are subject to a mandatory seven-day waiting period, ensuring that players make well-considered decisions before raising their financial thresholds.

Exceptions to Limits and Exclusions

In certain cases, a deposit limit or self-exclusion request may temporarily allow ongoing wagers to complete before fully taking effect. These exceptions include:

- Players participating in an active poker tournament when a time limit is reached.
- Unresolved ante-post bets on future events, where the wager remains open until the event concludes.

In these scenarios, all new deposits, bets, or gameplay will be restricted immediately, but the system will allow active games or wagers to be completed before enforcing the limit in full.

By integrating deposit limits and additional safeguards, Krevetka B.V. ensures that players have the tools necessary to gamble responsibly, while also maintaining compliance with Curaçao Gaming Control Board (GCB) regulations.

11. Reality Check

To encourage responsible gaming and promote player awareness of gaming duration and spending habits, Krevetka B.V. implements Real-Time Session Timers. This tool help players monitor their gambling behavior and make informed decisions about their play sessions.

A real-time session timer remains visible at all times while a player is logged into their account. This ensures that players are continuously aware of their active play duration.

By implementing Reality Check, Krevetka B.V. ensures that players remain informed and in control of their gaming habits, reinforcing responsible gambling principles in full compliance with Curaçao Gaming Control Board (GCB) regulations.

12. Marketing

Krevetka B.V. is committed to ensuring that all marketing, promotional, and advertising activities align with responsible gaming principles and do not encourage excessive gambling. Its advertising strategy prioritizes transparency, fairness, and player protection, ensuring that no misleading content or unethical marketing tactics are used.

Marketing efforts must never target minors, self-excluded players, or financially vulnerable individuals, and all business partners—including affiliates, influencers, and VIP representatives—must adhere to responsible gaming standards.

Responsible Advertising Guidelines

To maintain compliance with Curaçao Gaming Control Board (GCB) regulations, Krevetka B.V. enforces strict advertising and promotional restrictions, including:

- No aggressive or misleading tactics – Advertisements are clear, truthful, and non-coercive.
- No targeting of vulnerable groups – Marketing is not directed at minors, self-excluded players, or individuals displaying problem gambling behaviors.
- No portrayal of gambling as an investment – Gambling is not advertised as a means of financial success or a way to overcome debt.
- No misrepresentation of skill vs. chance – Advertisements do not imply that games of chance can be influenced by player skill.

- No emotional manipulation – Krevetka B.V.'s marketing does not depict gambling as a solution to personal struggles, such as stress, depression, or loneliness.
- No child-friendly content – Cartoons, animations, or themes that appeal to minors are not used in Krevetka B.V.'s marketing materials.
- No use of celebrities or influencers appealing to minors – Social media personalities or entertainers with a significant underage audience are not used for gambling promotions in Krevetka B.V.'s marketing materials.
- No sexual or explicit content – Krevetka B.V.'s Advertisements avoid suggestive or inappropriate imagery.
- No association with harmful behaviors – Krevetka B.V.'s gambling promotions are not linked to smoking, drug use, excessive alcohol consumption, or other unhealthy behaviors.

Bonus Promotions and Transparency

Krevetka B.V. ensures that all promotional offers and bonuses are communicated transparently.

- Bonus terms and conditions are clear and easy to understand.
- Promotions do not encourage excessive gambling or suggest that losses can be recovered through continued play.

Commitment to Responsible Gaming in Advertising

To reinforce responsible gaming awareness, Krevetka B.V. integrates clear responsible gambling messages into all consumer advertising.

- All advertisements include responsible gaming disclaimers or messaging.
- Offline advertising complies with responsible gambling standards set by media platforms.
- Social media gambling advertisements are age-restricted and explicitly identified as gambling-related content.
- Direct marketing campaigns (emails, SMS, push notifications) exclude self-excluded players and individuals with gaming limits.

Affiliate and Influencer Marketing Compliance

Krevetka B.V. holds all affiliates, influencers, and marketing partners accountable for adhering to responsible gaming policies. To ensure compliance:

- Affiliates must sign binding agreements enforcing responsible marketing standards.
- Regular compliance audits are conducted to prevent misleading or unethical advertising.
- Penalties are imposed for non-compliance with responsible gaming policies.

For social media influencers, Krevetka B.V. requires:

- Strict age verification to ensure they target an adult audience.
- No association with minors or vulnerable individuals.
- Avoidance of sexually provocative or misleading gambling endorsements.

Sponsorships and Responsible Branding

Krevetka B.V. ensures that all sponsorships and branding agreements:

- Do not appeal to minors or appear on youth sports equipment.
- Are not featured in events targeted at underage individuals.
- Include responsible gambling messages in all sponsorship content.

By prioritizing responsible advertising, maintaining transparency, and enforcing compliance, Krevetka B.V. ensures that all marketing activities uphold ethical gaming standards and protect players from misleading or excessive gambling influences.