

MOMO ENTERTAINMENT B.V.

Responsible Gaming Policy

Company	Momo Entertainment B.V.
Document Title	Responsible Gaming Policy
Applies To	All licensed platforms and websites operated under the Company's licence
Jurisdiction	Curacao
Regulatory Framework	Curacao Gaming Authority (CGA)
Version	1.0
Effective Date	January 1, 2025
Next Review Date	January 1, 2026
Approving Official	Board of Directors, Momo Entertainment B.V.
Responsible Office	Compliance & Player Protection Department

1. Policy Statement

Momo Entertainment B.V. (hereinafter "the Company") is committed to promoting responsible gambling across all platforms and websites operated under its licence. The Company recognises that while gambling is a legitimate form of entertainment enjoyed responsibly by the vast majority of players, it can cause harm for a minority of individuals. The Company takes this responsibility seriously.

This Responsible Gaming Policy sets out the Company's commitment to minimising the negative impact of gambling-related harm and to promoting responsible gambling practices across all its licensed platforms. It applies equally to all websites, brands, and gaming products operated under the Company's licence, ensuring a consistent standard of player protection regardless of the platform through which a player engages.

The Company's mission is to provide a safe, fair, and innovative adult gaming environment in which every player can engage within their financial means and receive the highest quality of service. Integrity, fairness, and player welfare are the guiding principles of the Company.

2. Purpose

The purpose of this Policy is to:

- Establish the Company's framework and standards for responsible gaming across all licensed platforms.
- Define the tools, controls, and support mechanisms available to players to manage their gambling behaviour.
- Protect vulnerable individuals, including minors and those at risk of gambling-related harm.
- Ensure compliance with the Curacao Gaming Authority's responsible gaming requirements.
- Provide clear guidance to staff on identifying and responding to signs of problem gambling.
- Signpost players to professional support organisations where required.

3. Audience

This Policy applies to:

- All players registered on any platform or website operated under the Company's licence.
- All employees, contractors, and agents of the Company involved in player-facing operations.
- All third-party platform operators, white-label partners, and affiliates operating under the Company's licence who are required to implement and adhere to the standards set out in this Policy.

4. Definitions

Term	Definition
Responsible Gaming (RG)	The set of policies, tools, and practices designed to prevent gambling-related harm and promote safe, controlled gambling behaviour.
Problem Gambling	Gambling behaviour that disrupts or damages personal, family, or vocational pursuits, and which may meet clinical criteria for gambling disorder.
Self-Exclusion	A voluntary process by which a player requests to be excluded from all or specific gambling activities for a defined or indefinite period.
Time-Out	A short-term voluntary break from gambling activities on the Company's platforms, during which the player cannot deposit or play.
Deposit Limit	A player-defined restriction on the maximum amount that may be deposited within a specified time period.
Minor	Any individual under the age of 18, or the minimum legal gambling age in the jurisdiction where the player resides, whichever is higher.

CGA	Curacao Gaming Authority — the regulatory body that licences and supervises the Company's gaming operations.
ADR	Alternative Dispute Resolution — an independent mechanism for resolving player complaints outside of court.
Licensed Platform	Any website, application, or brand through which gaming services are offered under the Company's CGA licence.

5. Policy Implementation

5.1 Responsible Gaming Framework

The Company's responsible gaming programme is founded on three core principles that apply uniformly across all licensed platforms:

Principle	Description
Player Safety	Protecting all players from harm through robust age verification, data security, fair game practices, and access to support tools.
Game Safety	Ensuring that all games and products offered on the Company's platforms are fair, transparent, tested by independent organisations, and free from deceptive mechanics.
Gambling Problem Prevention	Proactively identifying at-risk players, providing intervention tools, and facilitating access to professional support services.

The Company collaborates with research institutions, addiction specialists, industry associations, and therapy organisations to continuously improve its responsible gaming framework.

5.2 Player Security and Protection

The Company takes active steps to protect the safety and wellbeing of all players across its licensed platforms. Player protection measures include:

- **Age Verification:** Rigorous age verification is conducted at the point of registration and as part of the ongoing Know Your Customer (KYC) process to prevent participation by minors.
- **Privacy and Data Protection:** Players' personal data and payment information are handled in strict accordance with applicable data protection laws and the Company's Privacy Policy.
- **Fairness and Randomness:** All games and products offered on the Company's platforms are regularly audited and certified by independent testing organisations to ensure fairness, randomness, and transparency.
- **Responsible Marketing:** Marketing and promotional communications are designed to be transparent, accurate, and responsible. The Company does not make misleading

claims and does not direct marketing at vulnerable individuals or those who have self-excluded.

5.3 Protection of Minors

The Company maintains a strict policy of zero tolerance for underage gambling. No person under the age of 18 (or the minimum legal gambling age in their jurisdiction of residence, if higher) is permitted to register, deposit funds, or participate in any gambling activity on any licensed platform.

Measures in place to protect minors include:

- Mandatory confirmation of age and date of birth at the point of registration on all platforms.
- Identity verification as part of the KYC process to substantiate age declarations.
- Immediate account suspension and refund of deposits where underage access is identified, with reporting to relevant authorities where required.
- Guidance to account holders to keep their login credentials (username and password) secure and not to share them with any third party, including family members.
- Recommendation that account holders install parental control or internet filtering software to restrict access to gambling platforms by minors in their household. Examples include Net Nanny (www.netnanny.com) and Gamban (www.gamban.com).

5.4 Understanding Problem Gambling

The Company recognises that the vast majority of players gamble responsibly and for entertainment. However, the Company also acknowledges that gambling can become problematic for a minority of individuals, and takes this risk seriously.

Problematic gambling is defined as gambling behaviour that negatively interferes with a person's lifestyle, work, financial situation, or health — whether their own or that of their family. Pathological gambling disorder was formally classified as a psychological condition in 1980 under the DSM-IV and ICD-10 classification systems and is characterised as a prolonged, recurrent, and often reinforcing compulsion to gamble despite negative personal and social consequences, including debt, family breakdown, and occupational difficulties.

Certain habitual behaviours — including shopping, eating, exercise, or alcohol consumption — that are considered normal in moderation can become addictive for some individuals. Gambling carries a similar risk profile for a small proportion of the population.

5.5 Signs of Problem Gambling

While only qualified professionals can formally diagnose problem gambling, the following behavioural indicators may suggest that a player's gambling has become problematic. Players who identify with five or more of the following should consider seeking professional support:

1	Preoccupation with gambling — thinking about it constantly, planning the next session, or reliving past gambling experiences.
2	Escalating stakes — the need to bet increasing amounts of money in order to achieve the same level of excitement.
3	Unsuccessful attempts to cut back — repeated failed efforts to reduce, control, or stop gambling.
4	Restlessness or irritability — experiencing anxiety, frustration, or distress when attempting to reduce or stop gambling.
5	Using gambling as an escape — gambling as a way to cope with stress, anxiety, depression, or other life difficulties.
6	Chasing losses — returning to gamble after losing money in order to recover losses.
7	Dishonesty about gambling — lying to family members, friends, or others about the extent of gambling activity.
8	Illegal activity — engaging in unlawful acts to finance gambling.
9	Relationship or professional damage — gambling causing significant strain or breakdown in personal or professional relationships.
10	Financial dependency — borrowing money, selling possessions, or accruing debt to fund gambling.

5.6 Player Responsibility and Safe Gambling Guidance

The Company promotes the principle that informed, self-aware players are the most effective guardians of their own gambling behaviour. Players are encouraged to treat gambling as a form of entertainment — not a source of income or a solution to financial or personal difficulties.

The Company recommends that all players on its platforms follow these responsible gambling guidelines:

- ✓ Treat gambling as entertainment, not as a method to generate income or recover financial losses.
- ✓ Set a time limit before you start playing and stop when the time is up — the longer you play, the greater the cumulative risk of loss.
- ✓ Only gamble with money that you can genuinely afford to lose — never use funds earmarked for essential expenses such as rent, bills, or food.
- ✓ Set a deposit or loss limit before you start and commit to it. Once reached, stop.
- ✓ Never attempt to increase a limit you have already set in order to chase losses — this defeats the purpose of having a limit.
- ✓ Never chase losses. Attempting to win back money already lost is one of the most common drivers of problem gambling.
- ✓ Do not gamble while under the influence of alcohol, recreational drugs, or medication that may impair your judgement.
- ✓ Do not gamble when you are emotionally distressed, depressed, or anxious. Gambling in an impaired emotional state leads to poorer decisions.

- ✓ Take regular breaks and do not allow gambling sessions to run continuously for extended periods.

5.7 Responsible Gaming Tools

All licensed platforms operated by the Company are required to offer the following responsible gaming tools to players. These tools are accessible through the player account settings or by contacting Customer Support:

Tool	Description
Deposit Limits	Players may set daily, weekly, or monthly limits on the amount they can deposit across any licensed platform. Limits may be reduced immediately but increases are subject to a cooling-off period.
Loss Limits	Players may set a maximum loss threshold within a specified time period, after which further play is restricted until the period resets.
Session Time Limits	Players may set a maximum duration for each gambling session, after which they will be logged out automatically.
Reality Checks	Players may opt to receive periodic on-screen notifications during play, showing the duration of the session and net win or loss to date.
Time-Out	Players may request a short-term voluntary break from gambling, ranging from 24 hours to several weeks. During a Time-Out, the player cannot deposit or play on any licensed platform but may withdraw their remaining balance.
Self-Exclusion	Players may request a voluntary self-exclusion for a defined period (minimum six months) or indefinitely. During self-exclusion, the player is barred from all gambling activity across all licensed platforms and will not receive marketing communications.

Players wishing to activate any of the above tools should contact the Customer Support team of the relevant platform or access the responsible gaming section of their account. All self-exclusion and time-out requests are processed without delay.

5.8 Self-Exclusion — Cross-Platform Application

Given that the Company operates multiple licensed platforms and websites, self-exclusion requests are applied across all platforms under the Company's licence wherever technically feasible. A player who self-excludes on one platform will be excluded from all affiliated platforms operated under the same licence.

The Company implements the following safeguards in relation to self-excluded players:

- Immediate account suspension upon receipt of a self-exclusion request.
- Cessation of all marketing communications to the self-excluded player.
- Prompt processing of any withdrawal of remaining real-money balances.
- Records of self-exclusion maintained for a minimum of five (5) years.
- No re-activation of a self-excluded account before the expiry of the exclusion period without a formal cooling-off process and, where required, evidence of engagement with a support programme.

5.9 Identification and Intervention

The Company and its licensed platforms actively monitor player behaviour for indicators of potential gambling-related harm. Behavioural signals that may trigger intervention include:

- Significant increase in deposit frequency or amounts.
- Repeated failed withdrawal requests or reversed withdrawals.
- Extended or continuous gambling sessions without breaks.
- Patterns consistent with chasing losses.
- Player communications expressing financial distress or gambling-related concern.

Where such indicators are identified, the Company may take the following steps:

- Proactively contact the player to check on their wellbeing and signpost responsible gaming tools.
- Restrict or limit the player's access to certain products or features.
- Require the player to complete a responsible gaming assessment before continuing.
- Suspend or close the account where continued access poses a risk to the player's wellbeing.

Customers who show signs of gambling problems may be prohibited from playing specific products or from using the platform entirely, for their own protection.

5.10 Staff Training

All staff employed in player-facing roles across the Company and its licensed platforms receive training in responsible gaming as part of their induction, with refresher training conducted at least annually. Training covers:

- Recognising the signs of problem gambling.
- How to sensitively engage with a player who may be at risk.
- The responsible gaming tools available and how to assist players in activating them.
- Escalation procedures and referral to the Compliance and Player Protection team.
- Obligations under this Policy and applicable regulatory requirements.

6. Support Organisations

The Company is committed to ensuring that players who experience gambling-related difficulties are aware of and can access professional support. The following organisations provide free, confidential advice and support:

Organisation	Website	Helpline
GamCare	www.gamcare.org.uk	0808 8020 133
Gambling Therapy	www.gamblingtherapy.org	Available online
Gamblers Anonymous	www.gamblersanonymous.org	See website

BeGambleAware	www.begambleaware.org	0808 8020 133
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Players may also request a list of local support services from the Customer Support team of any licensed platform.

7. Compliance and Consequences of Non-Compliance

Compliance with this Policy is mandatory for all staff, licensed platform operators, white-label partners, and affiliates operating under the Company's licence. Failure to adhere to the standards set out in this Policy may result in:

- Internal disciplinary action, up to and including termination of employment or partnership agreements.
- Regulatory action by the CGA, including sanctions, fines, or licence conditions.
- Suspension or termination of a licensed platform's operating rights under the Company's licence.

The Compliance and Player Protection Department is responsible for monitoring adherence to this Policy across all licensed platforms and for reporting any significant breaches to the Board of Directors.

8. Related Information

- Momo Entertainment B.V. AML/CTF Policy
- Momo Entertainment B.V. Player Complaints Policy
- Momo Entertainment B.V. Privacy Policy
- Momo Entertainment B.V. Terms and Conditions
- Curacao Gaming Authority Licensing Requirements and Responsible Gaming Guidelines
- GamCare Code of Conduct for Online Gambling Operators

9. Contact Information

For responsible gaming assistance, questions about this Policy, or to activate any responsible gaming tool, please contact:

Company	Momo Entertainment B.V.
Address	Schottegatweg Oost 10, United 1-9 Bon Bini Business, Willemstad, Curacao
Email	info@momoentertainmentbv.com

Responsible Department	Compliance & Player Protection Department
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10. Policy History

Version	Effective Date	Approved By	Summary
1.0	January 1, 2025	Board of Directors	Initial Policy — new document

11. Policy URL

This Policy is published on all platforms operated under the Company's licence and is accessible to all players at any time. Players may also request a copy by contacting info@momoentertainmentbv.com.

This document is confidential and intended solely for the use of Momo Entertainment B.V. and its authorised personnel and licensed platforms.