

Responsible Gaming Procedure

**Fitzgerald Industries Group N.V.
("the Company")**

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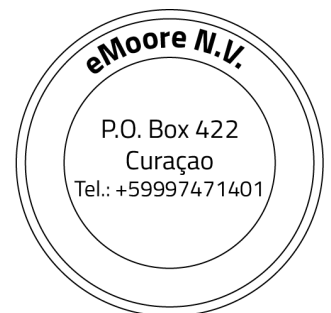


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Revision History

Version #	Effective Date	Approving Official	Responsible Office	Next Review Date	Comments
1.0	May 19, 2025	eMoore N.V.	Compliance function	May 19, 2026	-
1.1	September 22, 2025	eMoore N.V.	Compliance function	September 22, 2026	
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Definitions and Abbreviations

Advertisement activities	Marketing, promotion and advertising of all resources, messages and media of the operator's domain(s), brand(s), products, or services. This includes but is not limited to print and other media advertising content marketing, digital marketing, and social media campaigns. Bonuses also fall within advertisement activities.
CGA	Curacao Gaming Authority
Customer	Individual who has registered with the Company for the purpose of making use of the services offered on the Website and for which a Customer Account has been opened providing him/her with a username which can be activated using the Customer's email.
Customer Account	An account granted to an individual after registration on the Website. The Customer Account is created and issued by the Company and is required for wagering with real money. Only one Customer account is permitted per person, per IP address, per family and per Shared Environment.
Game of chance	Any game in which one or more Customers, in exchange for the payment of money or monetary value, compete for prizes in the form of money or monetary value, and the outcome of which is determined either by chance only or by a combination of chance and Customers' insight or skill, with no possibility for Customers to significantly influence the outcome, including sports betting and poker
LOK	National ordinance on the Game of Chance ('Landsverordening op Kansspelen')
Vulnerable Persons	a. Persons under eighteen years of age(minors); b. Person that has no, or insufficient, control over his or her gambling behavior, because of which he or she is, or threatens to become, addicted to one or more Games of Chance and,

	as a result, may cause harm to himself or herself or to other people; c. Person that has been banned from playing any Game of Chance either by force or at his or her own request; d. Person that has been declared bankrupt, or has otherwise lost the control or disposal of all or part of his or her property;
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1 Introduction and Policy Statement

The Company believes in a responsible attitude towards gambling and has implemented measures detailed within this document to promote and ensure responsible gambling. The Company believes that the industry, government and the community have a shared responsibility to help prevent the development of gambling related problems, and to ensure that problem gambling support services are available for those Customers requiring assistance.

For the majority of people, gambling is a pleasurable leisure activity and an enjoyable form of entertainment. 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.

As part of the Company's problem gambling initiative all staff receive responsible gambling training as part of the induction process and annually thereafter.

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.

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 monitors 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 a lifetime.

3 Problem Gambling

Problem gambling occurs when there is a lack of control over gambling, particularly the scope and frequency of gambling and the amount of recreational time spent gambling.

The negative impacts may include:

- Extreme financial losses relative to their sources of income;
- Adverse personal effect on the customer, his or her family and friends;
- Adverse effect on employers and work performance.

The Company's aim is to achieve equilibrium in the provision of gambling services, taking into account those Customers who enjoy our services and use them as a form of entertainment, the wellbeing of our Customers who have an acknowledged gambling problem, their families and the community at large.

4 Age verification

The Company does not allow anyone under 18 years of age to play on their website(s). Age verification is conducted in accordance with the AML guidelines of the CGA.

In the unlikely event that an underage Customer does manage to play, all deposits will be returned to the customer regardless of win or loss. The account will be closed immediately.

The company will retain records of all age verification process and their outcomes according to the Company's record keeping obligations and for regulatory review by the CGA.

5 Information Visibility

The Company ensures that Customers 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.

6 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.

Behavior tracking will be conducted by the Company's frontline personnel (such as customer support and/or VIP manager) and if at risk gambling behaviour arise, this behaviour is flagged for further handling. In addition, the Company can use technological tools including AI (Artificial intelligence) or ML (Machine Learning) for the flagging of gambling problems.

6.1 Player profile and Risk Assessment

The Company will create a customer profiler based on their risk rating. This Customer profile will determine the Customer's risk towards at risk gambling behavior, and the appropriate level of monitoring and Customer intervention.

6.2 Responsible Gaming intervention

Customers identified as exhibiting at risk gambling behavior will be informed of the Responsible Gambling tools available. These tools are designed to combat at risk

gambling behavior. These RG tools can range from deposit limits, cooling off and, self-exclusion options.

The Company can also apply the following to the Customer's account if the at-risk gambling behavior persists:

- Applying mandatory deposit limit to the Customer's account;
- Temporarily suspend the Company's account pending further investigation for at-risk gambling behavior;
- Permanently exclude the Customer in case of severe or persistent risk.

7 Self- exclusion

Self-exclusion is recognised by the gambling industry as a way for players to control their gambling. The Company offers a self-exclusion facility to help those customers who feel that their gambling is out of control and want our assistance to help them stop.

The self-exclusion request shall be applicable:

- A. To all brands/domains operated under the Company;
- B. All gambling activities related to one Casino vertical available on the Company's domain. If such option is provided by the Company to the Customer, as otherwise the self-exclusion under A will be provided for all gambling activities of the Company¹;
- C. All advertisement activities of the Company. An automatic opt-out will be triggered when self-exclusion is activated

The duration of the self-exclusion period must be at least 1 year. The Customer shall be able to set the duration for 3 years, 5 years, 10 years or a lifetime.

The Customer should be able to set their preference ~~of~~ for the duration of the self-exclusion period online, without requiring email communication or prior approval from the Company. Once this is set, all exclusions related to brands/domains, vertical gambling activities and advertisement activities automatically applies immediately.

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.

¹ Casino verticals are types of groups wagering activity available on the domain of the online casino, such as casinos (i.e. slots, table games) and sports betting (i.e. horsebetting)

- Ante-posts bets will be voided and refunded subject to AML/CFT regulations.²
- 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.

7.1 Reactivation of customer's account after self-exclusion

After the self-exclusion period ends, the Customer must request in writing (by email or chat) the unblocking of the account. The reactivation of the account cannot be instigated by the Company by re-commencing communications with the Customer.

7.2 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.

8 Time-Out/ Cooling off periods

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.

The Customer can choose from the following cooling off main options:

- Cooling off-Duration only: Restriction on all wagering activity for the period selected by the Customer on the brand where the restriction was initiated
- Marketing Opt-Out

The Customer can select (by tick-box) their preference in each of the above categories. The tick boxes will not be prechecked.

² Ante post bet bets are those placed in advance of the opening of betting market for that event

The Company will ensure that the duration and marketing opt out options are always available to choose from. The Company will communicate which cooling off options are further available to the Customers

The duration of the cooling off is set for a minimum of 24 hrs. The option to choose 7 days, 1 month and 3 months are available for Customers.

The customer can choose from the following when setting options for Cooling off:

The selection of restrictions submitted by the Customer will take effect immediately. The Company will not delay the activation of the Cooling off. Furthermore, The Company will not question the Customer's decision for accepting cooling off or conduct Marketing activities once opted out by the Customer.

The Company will incorporate a verification check for the selected periods of 1 or 3 months of cooling off for confirmation of such. The check will only be asked online and will be neutrally expressed.

The Customer's funds will remain accessible for withdrawal as the account will remain active but disabled.

The Customer's account will be automatically reactivated after the selected Cooling off period expires. No further action is required by the player.

9 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;

- Once a deposit limit is reached, the Customer will not be able to deposit more funds until the specified period for the limit resets;
- Any request to lower the deposit limit takes place immediately, while request to raise the limit are subjected to a 24-hour waiting period before implementation.

Any resolved and unresolved wagers that the Customer made prior to the deposit limit being set in place remains unaffected regardless of the limit set.

10 Reality Checks

Customers shall be able to receive and see on the screen a reality check within a gambling session. A reality check notification offers the Customer the option to exit the gambling

session e.g. log out. This will be further detailed in version 1.3 of this Policy as per the implementation schedule of the RG Policy CGA.

11 Customers Protection Measures

In order to prevent and combat problem gambling we provide, through our Responsible Gambling page, a number of measures to assist our Customers including:

11.1 Independent Organizations

The website of the Company will display the direct links to:

<https://gamblingtherapy.org/information/where-can-i-get-help/>

and /or

<https://www.gamcare.org.uk/self-help/links-to-other-support-agencies/international-support-contacts/>

and/or

<https://www.gambleaware.org>

as well as to specific names of organizations offering treatment options in case these are available in the target market of the Company. These links will be readily available on the footer of the website.

11.2 Problem Gambling Self-Assessment

Customers are encouraged to regularly assess their gaming habits to determine whether their gambling remains within healthy limits. The Responsible Gaming section on the website will contain information that any Customer can assess to help them identify any potential problem gambling behavior. The Responsible Gambling page shall contain a CAGE questionnaire (Adapted for Gambling) which Customers are encouraged to answer the following questions truthfully:

1. **C – Cut Down:** Have you ever felt you should cut down on your gambling?
2. **A – Annoyed:** Have people annoyed you by criticizing your gambling habits?
3. **G – Guilty:** Have you ever felt guilty about your gambling?
4. **E – Eye-Opener:** Have you ever had a morning "eye-opener" to steady your nerves or recover from gambling losses?

Interpreting the Results

- 0 Yes Answers: Low risk for gambling problems.
- 1 Yes Answer: Moderate risk; further assessment may be needed.

- 2 or More Yes Answers: High risk; further evaluation and intervention are strongly recommended.

The Company will recommend that any Customer who recognize problematic gambling behaviours through self-assessment should explore the available responsible gambling tools.

Alternatively, there is a commonly used test available from Gamblers Anonymous for the Customers to use – it is a 20-question quiz that can be accessed with the following link posted on the RG page: <https://gamblersanonymous.org/20-questions/>.

11.3 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.

The Customer can request records of their gaming and wagering history. If the Customer requests records of their betting history longer than 6 months ago, then the company will aim to provide these records to the Customer within 10 working days or in line with the applicable data protection legislation, whichever is longest. However, the Customer must bear in mind possible (legal) limitations regarding record keeping and that not all records will always be available to the Company

11.4 Language

All problem gambling material and content is available in English language only as well as the language of the target market(s). Procedures remain the same irrespective of language.

11.5 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.

11.6 Advertisement activities

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

Advertisement activities may not be conducted by the Company if the players have opted out during their Cooling Off period if they have opted out. As such, no bonuses, free play, or incentives may be offered during this period.

12 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.

12.1 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.

13 Internal evaluation

The Company understands that evaluation of Customer interactions is important to understand the impact they have had and to help ensure customers are getting the right help and support.

The findings of the Customer interaction evaluations are to be reported to the management of the Company.

This Policy and the Company's approach to customer interaction can then be amended using the findings from the evaluation.

14 Training

Mechanisms are established to ensure that appropriate and ongoing responsible gambling training is provided to all staff. All 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.

The trainings given will cover at least the following:

- Recognizing signs of gambling distress (e.g. Agitation, aggression, or financial desperation)
- Conducting sensitive and structured conversations with at risk Customers.

Directing Customers to appropriate Responsible Gambling support resources.