

DIGIBET N.V.

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RESPONSIBLE GAMING POLICY

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1. Introduction

The purpose of this **Responsible Gaming Policy** is to outline the commitment of *Digibet N.V. (hereinafter referred to as "the Operator")* to promote a safe, secure, and responsible gaming environment for all players. The Operator recognizes the importance of responsible gambling and the role it plays in preventing gambling-related harm. This Policy sets out the Operator's approach to minimizing the risks associated with gambling and providing tools and support to help players gamble responsibly.

2. Objectives of Responsible Gaming Policy

The main objectives of this policy are:

- To ensure a safe gambling environment for all players.
- To provide players with the necessary tools to manage their gambling behavior.
- To prevent gambling-related harm through proactive measures.
- To provide support and resources for players experiencing gambling problems.
- To comply with all relevant laws and regulations regarding gambling.

3. Commitment to Responsible Gaming

Digibet N.V. (the Operator) is committed to promoting responsible gaming and ensuring that gambling remains a form of entertainment and not a source of harmful addiction. The Operator has appointed a designated Responsible Gaming Officer (RG Officer), who is responsible for implementing, monitoring, and enforcing this Responsible Gaming Policy. The RG Officer serves as the primary point of contact for all matters related to responsible gaming and ensures compliance with the requirements of this Policy and applicable CGA guidelines. The Operator's commitment includes:

- Regularly reviewing and updating this policy to meet industry best practices.
- Providing clear guidelines to both players and employees on responsible gaming practices.
- Offering transparent, easily accessible information to players about the risks of gambling.
- Encouraging players to be aware of their behavior and to gamble within their means.

4. Prevention of Gambling Addiction

Gambling addiction is a serious issue that can affect both individuals and their families and may lead to financial, social, and psychological harm. The Operator takes proactive and preventive measures to reduce the risk of gambling addiction by:

- Monitoring players' behavior and intervening when necessary.
- Encouraging players to set limits on their gambling activity.
- Offering self-exclusion options for players who feel their gambling may be becoming problematic.
- Providing educational materials on the risks of gambling addiction.

5. Self-Exclusion and Account Limitation

The Operator provides responsible gaming tools that allow players to control or restrict their gambling activity in order to promote safe and responsible gambling behavior and to prevent gambling-related harm. These tools include self-exclusion, account limitations, and cooling-off options, which are available to all players at any time through their account settings or by contacting customer support.

5.1 Self-Exclusion

Players have the option to voluntarily self-exclude from gambling activities for a specified period of time. Self-exclusion prevents the player from accessing their account and participating in any gambling activity during the selected exclusion period.

Self-exclusion periods may range from temporary exclusions to long-term or permanent exclusions, depending on the player's request and the Operator's Responsible Gaming framework.

During the self-exclusion period:

- access to the player account is restricted
- gambling activity is blocked
- deposits and wagering are not permitted
- marketing communications are suspended
- bonuses and promotions are not offered

Player funds remain available for withdrawal in accordance with the Operator's withdrawal procedures and applicable regulatory requirements.

Self-exclusion requests are implemented immediately and without unnecessary delay. The Operator does not encourage players to reverse their decision or continue gambling once a self-exclusion request has been submitted.

5.2 Account Limitations

The Operator allows players to apply account limitations to better control their gambling behavior.

These limitations may include:

- deposit limits
- loss limits
- session time limits
- wagering restrictions

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Account limitations are available through the player account settings and are applied in accordance with Responsible Gaming procedures and CGA guidelines.

5.3 Cooling-Off Period

5.3.1 Overview

The Operator offers players the option to activate a *cooling-off period*, during which they are temporarily restricted from gambling activity.

The cooling-off option allows players to take a short-term break from gambling while maintaining access to their account for withdrawals and account management.

The cooling-off process includes the following categories:

- Duration
- Marketing Opt-Out
- Brand
- Vertical

Players are able to select their preferences in each applicable category using tick-boxes. Tick-boxes are not pre-selected, ensuring that players make an informed and voluntary decision.

The availability of Brand and Vertical selections depends on the Operator's platform configuration and responsible gaming framework.

5.3.2 Duration Options

Players may select one of the following cooling-off durations:

- 24 hours
- 7 days
- 1 month
- 3 months

Cooling-off restrictions apply for the entire selected duration and cannot be reversed during the active cooling-off period.

5.3.3 Vertical Options

Cooling-off restrictions may apply to:

- all gambling activity

- specific product verticals offered by the Operator, such as:
 - casino
 - sports betting ○ poker ○ peer-to-peer games
 - slots or other game categories

The Operator may apply vertical restrictions depending on platform functionality and responsible gaming configuration.

5.3.4 Brand Options

Cooling-off restrictions may apply to:

- the current brand (website or application)
- all brands operated by the Operator, including mirror domains

The scope of brand restriction depends on the player's selection and the Operator's system capabilities.

5.3.5 Marketing Opt-Out

Players are provided with the option to opt-out of marketing communications during the cooling-off period.

If marketing opt-out is selected:

- marketing materials are not sent
- promotional emails and messages are stopped
- bonuses and incentives are not offered

The Operator strictly prohibits the use of bonuses, promotions, or incentives to encourage continued gambling during the cooling-off period.

5.3.6 Actions and Implementation

5.3.6.1 Timing

Cooling-off restrictions take effect immediately after activation and are enforced according to the player's selections.

The Operator does not:

- question the player's decision
- delay the cooling-off activation

- complicate the process
- offer bonuses or incentives to continue playing

For cooling-off periods of 1 month or 3 months, the Operator may implement an online confirmation step to verify the player's request using neutral language such as: *"You wish to activate a cooling-off period for one month. Please confirm."*

5.3.6.2 Player Account

During the cooling-off period:

- gambling features are disabled
- deposits and wagering are blocked
- player funds remain available for withdrawal
- account access for withdrawals and account management remains available

5.3.6.3 Marketing and Communications

If marketing opt-out is selected:

- no marketing materials are sent
- no bonuses or promotions are offered
- no incentives or free play are provided

The Operator ensures full compliance with Responsible Gaming and CGA marketing restrictions during the cooling-off period.

5.3.7 Reactivation and Post-Cooling-Off Protocol

Player accounts are automatically reactivated after the cooling-off period expires. No additional action is required from the player.

Upon reactivation:

- gambling access is restored
- responsible gaming tools remain available
- the player may choose to apply new restrictions or limits if desired

The Operator continues to monitor player behavior after the cooling-off period in accordance with Responsible Gaming procedures and CGA guidelines.

6. Age Verification and Access Control

It is strictly prohibited for anyone under the legal age to gamble with *Digibet N.V.* The Operator implements rigorous age verification processes to ensure compliance with local and international laws. These include:

- **Age Verification:** All new players must verify their age before being allowed to make deposits or participate in gambling activities.
- **Access Control:** We use software to restrict minors from accessing our platform and gambling services.
- **Parental Control Information:** We provide resources for parents to manage or block access to gambling services. While there are myriad options available globally, the following third-party tools are examples that are available for parental control and website blocking:
 - Net Nanny – www.netnanny.com
 - GamBlock – www.gamblock.com ➤
 - CyberSitter – www.cybersitter.com

7. Tools for Players to Manage their Gambling

The Operator provides several responsible gaming tools to help players manage and control their gambling behavior, including:

7.1 Deposit Limits

- Players can set daily, weekly, or monthly deposit limits to control the total amount they deposit into their accounts over a defined period.
- Once a deposit limit is reached, the player will not be able to deposit additional funds until the specified period resets.
- Players may request changes to their deposit limits at any time through their account settings or by contacting customer support. Any request to increase the severity of a deposit limit takes effect immediately, while requests to decrease the severity of a limit are subject to a 24-hour waiting period before implementation.
- Any resolved or unresolved wagers placed prior to the deposit limit being set remain unaffected by the newly applied limit.
- In cases where a deposit limit or restriction is applied while a player is engaged in active gameplay or has unresolved wagers (including but not limited to poker tournaments or ante-post bets on future events), the restriction is applied immediately with the exception of the active gameplay or wager. Upon completion of the active gameplay, tournament, or event, the restriction fully applies. During this period, the player is not permitted to place additional wagers, enter new tournaments, or engage in further gameplay until the active event is completed.

Deposit limits form part of the Operator's Responsible Gaming framework and are designed to promote safe and controlled gambling behavior in accordance with CGA requirements.

7.2 Loss Limits

Players can set loss limits to help them control the amount they are willing to lose during a given period. Once the loss limit is reached, the player will not be able to place further bets until the limit is reset.

7.3 Session Time Limits

Players can set time limits for their gambling sessions. This helps ensure that players are aware of how much time they are spending gambling and encourages breaks.

7.4 Reality Checks

The Operator provides players with regular "reality checks" during their gaming sessions. These are notifications that inform players of how long they have been playing, giving them the opportunity to take a break or reconsider their activity.

8. Support for Players with Gambling Problems

The Operator is committed to supporting players who may experience gambling-related difficulties by providing access to assistance, self-help tools, and professional support resources. Responsible Gaming support mechanisms are designed to encourage early identification of problematic behavior and promote safer gambling practices.

Players are encouraged to seek support whenever they feel that their gambling activity may be becoming problematic.

8.1 Information Visibility

The Operator ensures that responsible gaming information and support resources are easily accessible to all players.

This includes:

- visible links to the Responsible Gaming Policy and support tools on the website
- responsible gaming information available on the homepage and footer
- clear references in the Terms and Conditions, including underage gambling prohibition
- links to responsible gaming organizations and support services
- easy access to customer support and Responsible Gaming contacts

Responsible Gaming information is presented in clear and plain language to ensure players can easily understand available support options.

8.2 Player Self-Assessment Tools

The Operator provides players with access to self-assessment tools that allow them to evaluate their gambling behavior and determine whether their gaming activity remains within healthy limits.

Players are encouraged to regularly review their gambling activity and assess their behavior using structured self-assessment tools and transaction history.

Access to Gambling History

Players are able to access a detailed record of their betting and wagering history directly from their player account, including timestamps of transactions for at least the previous *six (6) months*, without prejudice to retention periods required by applicable laws and regulations.

Players may request access to transaction history covering longer periods, and the Operator will provide such information within *ten (10) working days*. If additional time is required due to technical or operational limitations, the Operator may request an extension in accordance with CGA requirements.

This transparency enables players to better understand their gambling behavior and make informed decisions.

Self-Assessment Questionnaires

The Operator provides access to self-assessment questionnaires designed to help identify potential problem gambling behavior.

Players may access commonly used self-assessment tools, including:

- Gamblers Anonymous 20 Questions self-assessment test
<https://gamblersanonymous.org/20-questions/>

This questionnaire helps players evaluate whether their gambling behavior may indicate a potential problem and encourages responsible decision-making.

CAGE Questionnaire (Adapted for Gambling)

The Operator may provide access to scientifically recognized screening tools such as the CAGE Questionnaire adapted for gambling.

Players are encouraged to answer the following questions honestly:

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 recover from gambling losses or continue gambling?

Interpreting Results

- 0 Yes answers: *Low risk* of gambling problems
- 1 Yes answer: *Moderate risk* - further assessment recommended

- 2 or more Yes answers: *High risk* - professional support and responsible gaming tools are strongly recommended.

Players who recognize problematic gambling behavior through self-assessment are encouraged to immediately use Responsible Gaming tools such as deposit limits, coolingoff periods, or self-exclusion.

8.3 External Support Organizations

The Operator provides access to independent organizations and professional support services specializing in gambling addiction.

Direct links to international support organizations are available on the website, including:

- <https://gamblingtherapy.org/information/where-can-i-get-help/>
- <https://www.gamcare.org.uk/self-help/links-to-other-supportagencies/international-support-contacts/>
- <https://www.gambleaware.org>

These links are available in the website footer and Responsible Gaming section.

Where applicable, the Operator also provides contact details for local organizations in the target markets.

Players may be referred to professional counselors, treatment centers, and support groups specializing in gambling addiction.

All support services are independent from the Operator and are provided to ensure players have access to professional assistance when needed.

9. Training and Awareness for Employees

To ensure that all employees are equipped to support responsible gaming practices, the Operator provides regular training on:

- Recognizing the signs of problem gambling.
- How to use the tools provided by the company for self-exclusion and account limitations.
- How to effectively communicate with players who may need support or assistance.
- Ensuring compliance with responsible gambling regulations.

10. Monitoring and Reporting

10.1 Player Behavior Tracking

The Operator actively monitors gambling behavior on the platform in order to detect signs of problematic or high-risk gambling and to implement appropriate intervention strategies aimed at mitigating potential harm to players.

In accordance with Article 1.4(e) of the LOK, the Operator does not allow individuals who can reasonably be assumed to be vulnerable persons to participate in games of chance. The Operator applies a proactive and preventive approach to identify such individuals and ensure appropriate responsible gaming measures are applied.

The Operator adopts a holistic approach to behavior tracking by analyzing the overall relationship between the player and the platform, including gambling activity, interaction history, financial behavior, and gameplay patterns. This approach enables early identification of at-risk individuals and supports timely intervention.

The identification of problematic gambling behavior is based on multiple behavioral indicators. A single indicator alone does not automatically classify a player as a vulnerable or problem gambler. A determination is made when several indicators occur simultaneously and consistently over a period of time.

Key behavioral indicators may include, but are not limited to:

- frequent or increasing deposits
- repeated requests to increase limits
- extended gambling sessions
- chasing losses
- erratic betting patterns
- sudden changes in gambling behavior
- signs of distress or compulsive behavior in communications
- repeated withdrawals and re-deposits
- continuous gameplay without breaks

Frontline Staff Monitoring

Behavior tracking is supported by frontline staff, including customer support representatives, Responsible Gaming officers, and VIP managers, who are trained to identify potential signs of problematic gambling through direct player interaction and behavioral patterns.

A structured internal process is in place to:

- flag potential vulnerable players
- escalate cases to the Responsible Gaming team
- conduct further behavioral assessment
- implement appropriate intervention measures
- document actions taken

This structured flagging process ensures that all potential cases are reviewed and handled in a consistent and compliant manner.

Technological Monitoring Tools

The Operator utilizes technological solutions to support behavior tracking and risk detection, including:

- gaming platform monitoring tools
- behavioral analytics systems
- automated alerts and triggers
- responsible gaming dashboards
- artificial intelligence (AI) and machine learning (ML) tools where applicable

These tools assist in identifying unusual or high-risk gambling patterns and support timely responsible gaming interventions.

Intervention Measures

When problematic or high-risk behavior is identified, the Operator may implement appropriate responsible gaming actions, including:

- direct communication with the player
- responsible gaming warnings
- recommendation of deposit, loss, or session limits
- cooling-off options
- temporary account restrictions
- self-exclusion
- suspension of marketing communications
- referral to support organizations

All interventions are applied proportionally and in accordance with Responsible Gaming principles and CGA guidelines.

10.2 Reporting and Documentation

The Operator maintains a structured reporting and documentation process to ensure that all responsible gaming monitoring activities, flagged cases, and interventions are properly recorded and reviewed.

All responsible gaming actions are documented in internal systems and include:

- player identification and activity review

- risk indicators identified
- intervention measures applied
- communication with the player
- follow-up actions
- final outcome of the case

This documentation ensures transparency, accountability, and regulatory compliance.

10.3 Responsible Gaming Reporting Channel

The Operator provides a Responsible Gaming reporting channel through which players can raise concerns regarding their own gambling behavior or request assistance and support.

Players may contact customer support or the Responsible Gaming team to:

- request responsible gaming tools
- report concerns about their gambling behavior
- request account restrictions or self-exclusion
- seek guidance on responsible gambling practices

All requests are handled confidentially and in accordance with data protection and regulatory requirements.

10.4 Audits and Compliance Monitoring

The Operator conducts regular internal and external audits to assess the effectiveness of its Responsible Gaming monitoring and reporting framework.

These audits aim to:

- evaluate responsible gaming procedures
- ensure compliance with CGA requirements
- assess effectiveness of behavior tracking mechanisms
- review intervention processes
- identify areas for improvement

The Operator ensures continuous monitoring and periodic review of Responsible Gaming practices to maintain full compliance with CGA guidelines and applicable regulatory requirements.

10.5 Reporting to CGA and Regulatory Cooperation

The Operator cooperates fully with the Curaçao Gaming Authority (CGA) and provides regulatory information and documentation upon request.

Responsible Gaming monitoring records, audit reports, and compliance documentation may be made available to the CGA when required for regulatory review, inspections, or compliance assessments.

The Operator remains committed to maintaining transparent communication with the CGA and ensuring ongoing compliance with all Responsible Gaming obligations.

11. Compliance and Legal Considerations

Digibet N.V. complies with all applicable laws and regulations regarding gambling. This includes:

- Adhering to local and international gambling regulations.
- Working with regulatory bodies to ensure the proper implementation of responsible gaming policies.
- Regularly updating our policy in response to changes in laws and regulations.

12. Conclusion

Digibet N.V. is committed to promoting responsible gaming and providing a safe, secure, and controlled gambling environment for all players. The Operator ensures that appropriate tools, monitoring measures, and support resources are available to help players gamble safely and maintain control over their gambling activity.

Players are encouraged to make use of the available Responsible Gaming tools and support resources to ensure their gambling remains within safe limits.

For any questions or concerns regarding this Responsible Gaming Policy or responsible gaming measures, players may contact the Operator's customer support team or Responsible Gaming Officer through the provided communication channels.

The Operator remains dedicated to continuously improving its Responsible Gaming framework in accordance with CGA requirements and applicable regulatory standards.

