



RESPONSIBLE GAMING POLICY

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FLEXBETS FANTASY SPORTS ARENA INC.

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1. Introduction

1.1. Purpose

This policy outlines the process by which FlexBets Fantasy Sports Arena, Inc. (hereafter “FlexBets”) handles providing a responsible gaming platform and culture. FlexBets is committed to fostering a safe, transparent, and fair gaming environment for our users. This document establishes baseline internal controls to ensure operational integrity, regulatory compliance, and effective responsible gaming environment.

1.2. Scope

FlexBets is committed to integrating Responsible Gaming principles into our business models, ensuring that gaming on FlexBets’ services remains an enjoyable form of entertainment rather than a source of harm.

The policy includes proactive steps and processes to protect Vulnerable Persons, and promote responsible gaming, along with mitigation or prevention of problem gaming behavior.

This policy includes:

- Clear Responsible Gaming features and information that is easily available to all users and potential users
- Provision of Responsible Gaming tools and information resources to users
- Monitoring mechanisms and processes to detect and address problematic gaming behavior
- Compliance with all regulatory reporting and auditing obligations

Adherence by all FlexBets staff to this Responsible Gaming policy is considered a requirement under the FlexBets operational guidelines, and failure to adhere to these requirements and policies may result in termination or corrective action.

The FlexBets has a Responsible Gaming strategy with defined goals and a clear plan of action including timelines, risk assessments, measurable expected

outcomes, and metrics of success. This strategy is evaluated annually for progress, and the report is made available upon request.

1.3. Requirements

The following Responsible Gaming elements are mandatory for operational compliance with the FlexBets Responsible Gaming policy, regulatory obligations, and consumer protection guidelines:

- Age verification
- Information accessibility
- Player self-assessments
- Behavior and usage tracking
- Customer / User support
- Timeout or cooling-off periods
- Self-exclusion
- Deposit limits
- Highly skilled player protections
- Consumer advertising and marketing policies
- Training of employees
- Research, education and treatment options

2. Provision Organizational Structure & Oversight

- The Chief Compliance Officer shall oversee adherence to responsible gaming requirements, regulatory standards, and reporting to executive leadership.
 - This report shall provide recommendations as to any proposed operational or policy enhancements. Any material changes to the Responsible Gaming policy must be reported to the relevant regulatory bodies and 3rd party auditors.
- The Chief Operational Officer shall oversee 3rd party audits and adherence to operational standards, reporting to executive leadership.
- Separation of duties must exist between operations, finance and compliance.

3. Terminology

It is important to understand standard definitions for commonly used terms used throughout this Responsible Gaming Policy document.

Cooling Off means a pre-determined period that can comprise hours, days or months which is set by the user during which time the user may not deposit funds or place any wagers or contest entries whatsoever.

Gambling means the wagering of something of value on a game of chance-seeking a reward, where instances of strategy are discounted. By this definition, gambling requires three elements to be present: consideration (an amount wagered), risk (chance) and a prize (reward).

Gambling disorder is a recognized mental health diagnosis. Gambling disorder is characterized by a host of symptoms, such as needing to gamble with increasing amounts to achieve the desired excitement, lying to hide gambling activity, and repeated unsuccessful efforts to control, cut back on or stop gambling. A gambling disorder can propagate itself into games of skill as well as games of chance.

Games of Chance means any game in which one or more players, 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 players' insight or skill, with no possibility for players to significantly influence the outcome, including sports betting

Games of Skill (in the context of skill-based fantasy sports games) means skill-based competitions that adhere to the Unlawful Internet Gambling Enforcement Act of 2006 (UIGEA) exemptions. The UIGEA's requirement specifies that "all winning outcome[s] reflect the relative knowledge and skill of the participants and are determined predominantly by accumulated statistical results." It is the obsessive focus on the accumulation of statistical results and the prediction thereof that sets fantasy sports games apart as distinctly skill-based games. UIGEA supports the notion that online fantasy sports contests, whether through a mobile application or website, are predominantly skill-based.

Marketing, promotion and advertising refer to all resources, messages and media that promote FlexBets' 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.

Minor means any person under the age of 18.

Problem gaming refers to gaming behavior patterns that adversely affect an individual, family, or community. These can include financial, physical, emotional, societal, and other effects. Gaming can negatively impact someone's family, job, or health. Additionally, individuals who experience problem gaming are at risk of developing a gaming or gambling disorder.

Responsible gaming or refers to practices, policies and behaviors to ensure that gaming remains a safe and enjoyable activity for individuals who choose to participate. Responsible gaming initiatives are designed to prevent and reduce potential harm associated with gaming, promote consumer protection, improve community and consumer awareness and education, and provide referrals to resources offering treatment and recovery.

Self-exclusion is an event where a user voluntarily bars themselves from all or certain online gaming related activities during a period that can comprise days, months, years or indefinitely which is set by the user, during which time the user may not deposit funds or place any wagers or contest entries whatsoever and is excluded to the best of FlexBets ability from marketing, promotion and advertising campaigns.

Vulnerable Person is defined as:

- Under eighteen years of age (a minor).
- 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 or Games of Skill and, as a result, may cause harm to himself or herself or to other people.
- Has been banned from playing any Game of Chance or Games of Skill either by force or at his or her own request.
- Has self-excluded from FlexBets or other gaming services.
- Has declared or has been declared bankrupt.

4. Prevention of Underage Gaming and Platform Use

The minimum age to game on FlexBets' services shall be clearly stated on the platform and website.

FlexBets has implemented policies and put in place technical and operational measures to prevent access by those who are underage.

- Age verification is required as a part of a new user's account setup and before the deposit of any funds.
- A reputable independent third party Know Your Customer (KYC) service has been implemented to verify an individual's personally identifiable information.
- FlexBets implements rigorous age verification processes to ensure that all participants are of legal gaming age in their jurisdiction(s).
- During the account registration process, FlexBets and our KYC provider verify that the player is not a minor.
- If at any point, notwithstanding the checks put in place, FlexBets becomes aware that a user is a minor, the user's account must be closed immediately.
- Closing a minor's account may include the obligation to refund all deposits made by the user and the forfeiture of any winnings.
- FlexBets compliance and support staff shall clearly communicate to the minor the reason for the account closure and any winnings retained.
- Regardless of the above, proof of age document submission and checks are subject to FlexBets' Know Your Customer and AML policies and at a minimum include a government-issued valid ID check (such as a passport, national ID, or driver's license) on reaching specified thresholds and in any case prior to first withdrawal.
- Secondary verification methods such as electronic verification systems, payment validation, third party or government database checks, selfie verification, may be undertaken by the FlexBets at its own discretion, but do not supersede the government-issued document requirement.
- FlexBets and third-party KYC systems must maintain records of all age verification processes and their outcomes. These records must be made available for regulatory and 3rd party audit review.

If an underage customer is found, their play is immediately stopped, and their account is locked. If an approved account is found to be accessed by someone underage, FlexBets provides notice, education and resources on the risks associated with underage gambling, locks the account, and requires a cooling-off period prior to reactivation. However, if underage access reoccurs, the account shall be closed and the user restricted from future participation for a duration determined by the Compliance Officer.

5. Responsible Gaming Information and Accessibility

5.1. Responsible Gaming Section

At all times FlexBets services must ensure that a distinct Responsible Gaming Section (the “RG Section”) is available for users.

The RG section must:

- Be clearly identifiable and accessible.
- Contain easily understandable information so that users can make informed choices and selections.
- Include direct access to all relevant tools a user may use to manage their gaming behavior including, but not limited to, self-exclusion, timeout or cooling-off period, limit setting and other Responsible Gaming measures.
- Display information about how the player may contact the operator regarding any Responsible Gaming concerns via email or chat.
- The RG Section must be made available in English and the language of the target market. At all times the English version takes precedence if there are discrepancies.

5.2. Mobile Application and Homepage Accessibility

- A clear and visible link to the RG Section must be present within the app main menu and FlexBets website.
- Display information about how the user may contact FlexBets support regarding any Responsible Gaming concerns via email or chat.

5.3. Terms & Conditions Inclusion

- The RG Section must be explicitly referenced and included within the Terms & Conditions or Terms of Use.
- The Terms & Conditions or Terms of Use must be no more than one click away from the homepage of the website.
- Users must accept the Terms & Conditions or Terms of Use in order to use the FlexBets Mobile Application or create a website account.
- Players must be informed about the Responsible Gaming tools available, their functionality, and how they can be used.

5.4. Footer and RG Information Requirements

The footer of the FlexBets website and relevant application screens must contain the following essential details:

- A clear visual indication that under-age gaming is prohibited.
- A link to the FlexBets RG Section and FlexBets Terms of Use.
- A direct link to one or more gambling addiction support resources such as www.ncpgambling.org, 1-800-gambler or other help resources.
- Responsible Gaming links and contact information shall be provided by specific regional jurisdiction where required:
 - **Arizona specific responsible gaming information to include:**

If you have a gambling problem, help is available from the toll-free Arizona statewide helpline at 1-800-NEXT-STEP (1-800-639-8783) or text NEXT-STEP to 53342.

You may also visit <https://problemgambling.az.gov>.

- **Colorado specific responsible gaming information to include:**

Please play responsibly, for help call 1-800-GAMBLER (1-800-426-2537) or visit <https://sbg.colorado.gov/problem-gambling-resources>.
- **Maryland specific responsible gaming information to include:**

Please play responsibly, for help call 1-800-GAMBLER (1-800-426-2537) or visit <https://www.mdgamblinghelp.org/>.
- **General RG footer example:**

Void where prohibited. If you or someone you know has a gaming problem, get help. Crisis services and confidential responsible gaming counseling can be accessed by calling 1-800-GAMBLER (1-800-426-2537) or online at www.ncpgambling.org. You must be 18+ in most eligible jurisdictions, but other age and eligibility restrictions may apply. Valid only in jurisdictions where FlexBets operates. See FlexBets.io/terms for full terms of use and FlexBets.io/bonus for promotion terms and conditions.
- **Parental controls statement example:**

FlexBets verifies all accounts for age and eligibility. If any minors (under 18) are living in your household and have access to your computer, your account information, personal information, banking information, please consider installing parental control software to prevent access to FlexBets Fantasy Sports Arena.

If you believe a minor is found playing FlexBets, please contact us (support@flexbets.io) for account closure and appropriate measures. Take responsible measures to ensure all devices are locked appropriately before stepping away.

You may consider links to third-party software that can help restrict access to gambling websites. While there are myriad options available

globally, the following third-party tools (some paid, some free) are examples that are available:

BetBlocker –betblocker.org, GamBlock – gamblock.com,
Gamban – gamban.com, NetNanny - US Toll Free at 1-800-485-4008

6. Responsible Gaming Tools and Features

FlexBets' customers/users are provided with highly visible and readily accessible tools and information to help them make informed decisions about their gaming. This information has been designed with accessibility in mind and ensures equitable access for all individual.

All information and tools are presented in clear and plain language (maximum sixth grade reading level), and they appear on the platform and in languages commonly used in the state. The responsible gambling information includes, but is not limited to:

- Practical tips on how to keep gambling within safe limits.
- Education and encouragement to use responsible gaming tools and features upon account setup.
- Information that corrects common misperceptions about gambling.
- Functionality and rules for each game.
- Tips on preventing access to a customer's account by underage, unregistered, unauthorized or excluded customers.
- Risks associated with gaming.
- Signs of a potential gambling problem for themselves or their loved ones.
- Behaviors and coexisting conditions that are often related to problem gambling.
- How to access personal data on gaming behaviors and activity.
- Direct link to a problem gambling helpline specified/approved in regulations.
- Players receive on-screen prompts, messages, or updates on the tools for responsible gambling that are available to manage their play.
- FlexBets uses behavioral tracking data and information to advise at-risk players to use responsible gambling tools.

- FlexBets' Compliance Officer regularly assesses the uptake of responsible gambling tools and makes updates/changes as necessary to increase participation in player protection measures.
- Responsible gaming information and tools are readily available across all platforms (including web, desktop, mobile application and any other device that can be used for internet gaming on the FlexBets services).

6.1. Self-Assessment

FlexBets' services shall allow users to access a detailed record of their betting and wagering history including:

- Timestamps of transactions from their user's account of at least the last six months, without prejudice to retention periods required by other applicable laws and regulations.
- Players should be encouraged to regularly assess their gaming habits to determine whether their gaming remains within healthy limits by providing self-assessment tools that allow them to identify potential problem gambling behavior.
- Users have instant access to their personal gaming history and account details, including, but not limited to, the following:
 - Amounts wagered, won and lost by week and month
 - Time spent gaming by day, week and month
 - Money spent by day, week and month
 - Number of games played by day, week and month
 - All details of deposits, withdrawals, and overdrafts
 - Restrictions, such as self-exclusion events and limits
 - Participation time alerts
 - Single and cumulative wager amount alerts
 - Quantity of competitions entered alerts
- Free resources for gambling help – With links to help and assessment tools.

This information is readily available across all platforms. Users receive live, onscreen spend and time updates on an hourly basis during play. Spend limits are displayed in cash, not credits.

6.2. Time and Budget Management

Users may set limits on the amount of money and time they spend using the platform across all products. The platform enables customers to set limits upon account setup.

FlexBets may encourage or incentivize limit usage. Examples of limit setting available include:

- Users can set daily, weekly, or monthly limits on the size of deposits.
- Users can set daily, weekly, or monthly limits on the amount of time spent on the platform.
- Play is automatically and immediately stopped when the limit is reached, and the customer is notified that they have reached their selected limit.
- Users cannot relax limits until limit settings expire.
- Users may view the status of their limits on the RG page.
- The user's account details page is accessible across all platforms.

6.3. Time-Out / Cool-Off and Self-Exclusion

FlexBets has implemented and maintains effective processes and tools that empower the player to manage their own gambling behavior. Two key mechanisms are made available to players at all times via the RG Section of the mobile application:

- **Time-Out / Cool Off:** A short-term, temporary restriction from gaming activities, which the player can customize.
- **Self-Exclusion:** A long-term, irrevocable exclusion from all gaming activities and marketing campaigns.

Users shall not be guided or influenced toward one option over another. No interference, bonuses, or reassurances may be provided for either method.

Users shall be clearly informed of the differences between the two options and offered the opportunity to proceed directly to self-exclusion if they self-identify as vulnerable or at risk.

The time-out and self-exclusion pages on the platform include resources for assistance, including, but not limited to, the problem gambling helpline specified/approved in regulations, software options for blocking online gambling, and local treatment and recovery resources.

Time-Out / Cool Off details:

Users can set time-outs, also known as break periods or cool offs. Time-outs are instant stops in all service access and gameplay and are available in user configurable lengths from at least 1 hour to less than 12 months. Longer stops in gameplay are available under the self-exclusion procedure. A player who requests a time-out is also provided with information on how to self-exclude. Time-out conditions include:

- At the end of the time-out period, gameplay and FlexBets service access is automatically resumed.
- Players are not prompted with email, push notifications or other means to encourage them to resume play or self-maintain the time-out.
- Users will continue to be excluded from marketing campaigns until they reenable their account by access the service through the mobile application.

Self-Exclusion Details:

Self-exclusion is a long-term, user-initiated restriction on their ability to play on the FlexBets platform. The self-exclusion functionality is no more than three clicks from anywhere on the platform after logging in. Instructions on how to self-exclude are presented in clear language, using a font size that is standard to the remainder of the platform and easily accessible. Messages to users shall not be worded or presented in such a way to dissuade them from self-exclusion.

The options for the length of self-exclusion range in increments from six months to lifetime. All self-exclusions, regardless of length, are irrevocable until the expiration date. During self-exclusion registration, the user is provided with clearly worded information outlining the conditions of the restriction and via email following registration. Users who self-exclude are provided with information via their preferred contact method, as determined in their account settings, about available help, and prevention services (e.g., the helpline specified/approved in regulations, online gambling blocking software, local treatment and recovery resources, etc.). Self-exclusion conditions include:

- Self-exclusions take effect immediately.
- The user's FlexBets account is closed or suspended upon the company's receipt of the self-exclusion application.
- The user is unable to access their FlexBets account in any way and is presented with a message communicating their account is in self-exclusion status so that no deposits, withdrawals or contest entries can be placed.
- Users may renew their self-exclusion once it concludes, if it was set for a term less than a lifetime.
- Systems are designed to ensure that users are not automatically notified at the end of the self-exclusion period.
- Excluded users do not receive any promotional materials until the reinstatement process is completed.
- Users may reenable their account by access the service through the mobile application once their self-exclusion duration expires.
- When a customer is reinstated, they are notified that their play is tracked, monitored, or limited for a specified period to ensure they are not still at risk.

Conditions of Self-Exclusion During self-exclusion registration, the customer is provided with clearly worded information that outlines the conditions of the restriction, and also via email following registration. Minimally, this information includes the following:

- Length of self-exclusion.
- Account closure processes and consequences for any accounts breaching restriction (e.g., a new account opened by the same person during the self-exclusion).
- Notification of removal from promotions and direct marketing.
- Requirements for reinstatement upon expiration of the self-exclusion.
- How open entries, reward points, and remaining balances are handled.
- A record of user data is provided outside the platform in an easily accessible file format (e.g., PDF) including:
 - o amounts wagered, won and lost
 - o time and money spent
 - o net wins/losses
 - o all deposits, withdrawals, and overdraft occasions
 - o bonus or promotion money information
 - o restrictions such as self-exclusion events and limits
 - o number of occasions where time/money limits were met
 - o net outcomes including total won or lost over a defined period
- Information sent to users who self-exclude shall not include promotional materials.
- If a user attempts to set up a new account, they are notified of the reason they were prevented from playing, and provided resources, including available help and prevention services (e.g., the helpline specified/approved in regulations, online gambling blocking software, local treatment and recovery resources, etc.).

FlexBets shall maintain robust KYC measures to identify where reasonably possible to identify if duplicate accounts exist and prevent self-excluded individuals from creating new accounts under different credentials.

Contributions to JunglePrize progressive jackpots that were made by the user through gameplay prior to the self-exclusion request remain in-situ, but the player

is no longer entitled to participate in the JunglePrize with further entries after the self-exclusion is in effect.

7. Training and Staff Readiness

FlexBets shall train customer service and Responsible Gaming staff to handle player interactions professionally and effectively.

All staff, including new hires, receive updated annual training on responsible gambling with content including, but not limited to:

- Definitions of common responsible gaming key terms.
- Myths and facts about gaming and gambling.
- The company's responsible gambling policies and strategy.
- The role each staff member/department plays in contributing to player protection and harm reduction.
- The employee gambling policy.
- The 'problem gambling' helpline specified/approved in regulations.
- Available responsible gambling tools (including limit setting, self-exclusion/time-out, etc.).
- Online gambling blocking software.
- Local/virtual treatment and recovery resources.

Customer-facing staff have additional annual training on customer protection, responsible gambling, and problem gambling interventions. This enhanced training includes the above content as well as, but not only, the following content:

- Definitions of problem gambling and intervention key.
- The spectrum of gambling behavior.
- Signs/symptoms/triggers of problem gambling.
- Recognizing signs of gambling distress (e.g., agitation, aggression, or financial desperation).
- Conducting sensitive and structured conversations with at-risk players.
- How users can access help with problem gambling and the types of help available.
- How to use responsible gambling tools from a customer perspective.

- Employee self-care and debriefing tools to be used after assisting customers experiencing potential problems.
- Methods for effectively directing users to appropriate support resources and Responsible Gaming tools.
- Empathic skills and procedures specific to their position to respond to situations where a customer may experience distress (e.g., scripts, examples, etc.).
- Crisis/suicide prevention resources.

The training content is updated regularly, at least annually. Some elements of the training are interactive. For example, interactive training could include live, online training, role-playing, face-to-face training, user-led content, etc.

The training should be developed with the inclusion of lived experience, perspectives and experiences with gambling-related problems.

Training Effectiveness:

The training effectiveness shall be evaluated through a formal mechanism, such as pre- and post-tests. Trainee feedback shall be collected and reviewed.

Customer-facing staff skills should be regularly assessed through customer service requests, and by looking at how they are handled.

8. Marketing & Advertising

Responsible Marketing Policy

FlexBets has a clearly-articulated commitment to responsible marketing, including advertising and promotion. The Responsible Marketing Policy clearly outlines the company's intentions, objectives, and goals regarding the marketing of responsible gaming.

Content Integrity: All marketing provides accurate expectations about the outcomes and risks of gambling. Key points include:

- Gaming, competitions or gambling must not be presented as a way to solve financial problems.
- Marketing and advertising must not encourage excessive or unaffordable spending.
- Marketing and advertising must not misrepresent the chances of winning.
- Advertisements must include accurate representations concerning the number of persons winning as applicable.
- Marketing and advertising must not primarily appeal to minors.
- The odds of winning or losing must not be misleading.
- Gaming and competitions must never be presented as risk-free.
- Advertising must not portray gaming as a substitute for financial, emotional, or mental well-being.
- Marketing and advertisements shall comply with the Federal Trade Commission, Guides Concerning Use of Endorsements and Testimonials in Advertising as compiled in 16 CFR 255
- Communications with customers shall refrain from intentionally encouraging customers to:

- increase the amount they play with;
- play or game continuously;
- re-gamble winnings; and
- chase losses.

Content Review: There is a risk assessment and evaluation process for all marketing and advertising campaigns or content that may be viewed by people with gambling problems, populations at greater risk of developing gambling problems, or underage populations.

- Any identified mitigating factors are included in a campaign, should these be required in the case of medium- to high-risk content.
- Bonus and other offer conditions are clear, simple, and easy to access.
- All physical and digital content associated with responsible and problem gambling are not paired with promotions or play-related rewards programs.
- All advertisements and marketing content shall be reviewed for compliance with the Federal Trade Commission, Guides Concerning Use of Endorsements and Testimonials in Advertising, compiled in 16 CFR § 255.
- Any contracted or 3rd party endorsements must be reviewed and reflect the honest opinions, findings, beliefs, or experience of the endorser. Furthermore, an endorsement may not convey any express or implied representation that would be deceptive if made directly by FlexBets.

Advertising Targeting : Adults of legal gambling age are the sole intended audience for the company's marketing, advertising, and promotion.

- All social media channels are age-gated where possible and clearly signaled as 18+ in all instances.
- The company makes an intentional effort to avoid marketing to audiences at higher risk for gaming or gambling disorder and those under the legal age to game or gamble.
- FlexBets has an advertising risk assessment and evaluation process in place for campaign targeting that considers the potential negative impact on minors.
- Campaigns are not misleading about the level of risk involved or the opportunity to make money.
- FlexBets competitions and services are clearly presented as a form of entertainment.

- No explicit content – Adverts, messaging or any communications must not contain any overt sexual or pornographic imagery or suggestion.
- No encouragement of unrelated harmful behaviors – there must be no linkage between gambling and smoking, drug use, alcohol consumption, seduction, or enhanced attractiveness.
- Customers are given the option to opt in or out of email, direct messaging, and SMS marketing messaging at any time.
- Customers have the capability to request to reduce the frequency of or to opt-out entirely of direct advertising/marketing at any time.

The result of these efforts and the Responsible Marketing Policy is that the primary audience of the company's advertising and promotion is not people experiencing gambling-related harm or populations at greater risk of experiencing gambling-related harm, including underage populations.

FlexBets shows a proactive and responsible approach with demonstrable safeguards in place when developing and placing advertising and promotions that may be seen by audiences who are statistically at a higher risk of experiencing gambling-related harm. The company effectively balances objectives by striving to minimize potential harm while simultaneously reaching the desired target demographic.

Offers and Bonuses

All offers and bonuses must:

- Include terms and conditions that are full, accurate, clear, concise, transparent, and do not contain misleading information;
- Have advertising materials that include any material terms and conditions for that offer or bonus and have those material terms in close proximity to the headline claim of the offer or bonus and in reasonably prominent size;
- Not be described as free unless they absolutely are free. If the customer has to risk or lose their own money or has conditions attached to their own money, then the offer or bonus must disclose those terms;
- Not be described as risk free if the customer needs to incur any loss or risk their own money to use or withdraw winnings from the risk-free bet; and
- Not restrict the customer from withdrawing their own funds or withdrawing winnings from bets placed using their own funds;

- Bonuses and promotions must not be used to encourage excessive gambling.

Additional Conditions:

- FlexBets is responsible for materials provided to affiliates, representatives, sponsorships, ambassadors social media influencers, including wordings and visual representations, where the influencers actions and/or statement are paid placement or advertisement.
- FlexBets shall make any contracted third-party aware of this Responsible Gaming policy and require them to adhere to it.
- All advertising and marketing content must include a clearly visible responsible gaming message or slogan.
- Advertising, marketing, and promoting of gaming services shall not occur at event venues where most of the audience at most of the events at the venue is reasonably expected to be under the legal age of participation.
- Advertising or promotional activities are prohibited at elementary and secondary schools.
- Advertising or promotional activities are prohibited at college sports events.
- Advertising or promotional activities shall not target individuals who have requested a restriction.
- Event wagering messages, including logos, trademarks, or brands, shall not be used, or licensed for use, on clothing, toys, games, or game equipment intended primarily for persons under the legal age of participation in the jurisdiction.
- Event wagering shall not be promoted or advertised in college or university-owned news assets, including digital news assets.
- Event wagering shall not be promoted or advertised on college or university campuses, except for generally available advertising, including television, radio, and digital Advertising.

9. At Risk Behavior Identification and Tracking

FlexBets may utilize active monitoring to detect signs of problematic gambling and identify clear intervention strategies for high-risk players in order to mitigate harm. By holistically analyzing a user's historic and current activities, FlexBets responsible

gaming staff can identify at-risk individuals and take proactive steps to prevent gaming-related harm.

Risky behavior tracking is typically undertaken by frontline staff (such as customer service representatives or VIP managers) as they are in the best position to identify problematic behavior through patterns and direct interactions. Staff receive training on flagging potential vulnerable gamers may serve as a trigger for intervention protocols. Risky behavior factors include but are not limited to:

- Deposit and wagering frequency – sudden unexplained increases in wagering or gaming session patterns.
- Repeated failed transactions due to insufficient funds.
- Reversing withdrawals – Users cancelling withdrawal requests multiple times.
- A pattern of inexplicable extended play sessions.
- Unreasonably increased communication with customer support – including requests for bonuses or reflecting signs of agitation.
- Frequent changes to Responsible Gaming tools – such as continuously setting or changing deposit or loss limits or repeatedly making use of cooling-off period.
- Users maxing out a credit card.
- Attempts to open multiple accounts to bypass deposit or loss limits.

Responsible Gaming Interventions:

Users identified as exhibiting at-risk behavior should be informed by FlexBets responsible gaming staff of the Responsible Gaming tools available to the user, such as deposit limits, cooling off, and self-exclusion options.

FlexBets responsible gaming staff may, at their discretion and for the sole purpose of mitigating harm to a user, follow a clear escalation protocol where appropriate, which may include:

- Applying mandatory deposit limits to the player's account.
- Temporarily suspending the account pending further assessment.
- Temporarily excluding the player in cases of severe or persistent risk.
- Under no circumstances shall FlexBets' staff use Responsible Gaming measures as a pretext to prevent or delay legitimate player withdrawals.

- FlexBets' staff may never misuse protective interventions for financial gain and, if identified as such, will be considered a breach of policy and may result in the termination of any identified staff participating or aiding in such activities.

10. Recordkeeping & Audit

All responsible gaming complaints and resolutions will be recorded and retained for a minimum of 6 years. These records are used for internal quality assurance, compliance audits, and regulatory reporting.

- Transaction logs, contest records, and system access logs must be retained for a minimum of 6 years.
- External audits must be conducted annually by an independent auditor.
- Audit trails must be tamper-proof and accessible to authorized regulators upon request.

11. Regulatory Compliance

- FlexBets must comply with all applicable federal, state, and local responsible gaming laws and regulations, including:
 - Fantasy contest regulations
 - Data privacy laws (e.g., CCPA, GDPR)
 - Financial reporting and tax obligations
- Regulatory reports must be filed timely and accurately.

12. Continuous Improvement

FlexBets executive staff, Chief Compliance Officer and Chief Operations Officer will review complaint data quarterly to identify trends and take proactive steps to improve user experience, prevent recurring issues, and enhance platform integrity.

13. Training & Policy Enforcement

- All employees must complete annual training on the customer support and complaint policy and procedures, internal controls, data privacy, fraud prevention, and regulatory obligations.
- Policy violations must be investigated and appropriately disciplined.

14. Updates & Review

- This Responsible Gaming Policy document must be reviewed and updated at least annually or as required by regulatory changes or operational shifts.