

# RESPONSIBLE GAMING POLICY

**Last Updated May 30, 2025**

Welcome to the Responsible Gaming Policy (the “**Policy**”) of Winzilla Ltd. (a company registered and existing under the laws of Cyprus, having registration number HE 474611 and its registered address at 39 Dimofontos Street, 3rd Floor Office 301, Nicosia, 1075, Cyprus) and its related, affiliated or subsidiary companies (the “**Company**” or “**we**”, “**our**”).

When we refer to “you” or “your” in this Policy we mean any individual who interacts or uses our Services. By using the Services, you represent that you understand and agree to this Policy. If you do not consent to our practices, you can choose not to use the Services.

The Company is committed to the protection of our players and promoting responsible social gameplay as a matter of customer care and social responsibility. We aim to provide the most fun, social, and rewarding experience possible while taking appropriate measures to ensure gameplay is being conducted responsibly.

We believe it is our responsibility to our customers to ensure that you enjoy your experience using our products and services, while remaining fully aware of the potential risks that can be associated with online and mobile gameplay.

To ensure that you continue to enjoy safe and manageable play, we fully support responsible social gameplay and have put measures in place to assist players who wish to control their play, and we reserve the right to activate these measures unilaterally if, in our sole discretion, we consider them necessary.

## 1. Introduction

- (a) This Policy describes the tools, information, and resources available to the Company’s customers (Users). This Policy forms part of the Company’s [Terms of Use](#) (the “**Terms of Use**”). Any defined terms used herein shall have the meaning given to them in the Terms of Use (unless specifically defined herein). The Company may update this Policy at any time. Amendments will be published on our Website and such changes will be binding and effective immediately.
- (b) Whenever we amend this Policy in a way that would limit your current rights or be detrimental, we will notify you upon your next visit to the Website and you will be required to re-confirm your acceptance prior to using the Services. If you do not agree to the amended Policy, you must stop using the Services.

## 2. Company Responsible Gameplay Program

- (a) The Company Responsible Gameplay Program (the “**Program**”) is centered around essential principles dedicated to providing our customers with tools, information and help resources needed to: (i) make informed decisions when playing; and (ii) prevent problematic gameplay from occurring on the Company. The Program offers a range of

resources to support the needs of individuals at any stage of the customer lifecycle and any level of gameplay.

- (b) The Company understands that it is a shared responsibility to achieve a fun and affordable gameplay environment and that it is an individual's choice to play or not. As such, our Program is focused on providing tools, as well as educating and supporting informed decisions.

### **3. Company Responsible Gameplay Tools**

- (a) Activity Reminders. The Company assists your responsible gameplay efforts by providing an hourly Activity Reminder, which (i) indicates how long you have been playing; (ii) displays your play history since logging in; and (iii) allows you to end the gameplay session or continue playing.
- (b) Account History. Within your account settings, the Company provides “Gameplay History” information, which shows the result of each play over a defined period, as well as “Purchase & Prize History” information which shows purchase and redemption history over a defined period.
- (c) Limits. The Company enables you to set limits by using the “Contact” form, under “Responsible Social Gameplay Options.” These include:
  - (i) Purchase Limit. Enables you to limit the amount of tokens you can purchase during your chosen time period (daily, weekly, or monthly). Once the limit is reached, you will not be able to make any new purchases until the limit resets.
  - (ii) Play Limit. Enables you to set the maximum amount of tokens you can play for your chosen time period (daily, weekly, or monthly). Once the limit is reached, you will not be able to play any more tokens until the limit resets.
  - (iii) Daily Time Limit. Enables you to set exactly how many hours you are logged into your account, up to a maximum of 10 hours per day. Once the limit is reached you will be logged out until the next day.

All limits can be adjusted or removed at any time. A decrease to any limit will have an immediate effect. In contrast, an increase to or removal of any limit will take effect following a 72 hour cooling period.

### **4. Responsible Gameplay Access Control Tools**

The access control tools described below are available for you to implement if you believe that your gameplay may have become, or is at risk of becoming, problematic (as further defined below in Section 7(d), under “What is Problematic Gameplay”).

- (a) Taking a Break. - You may submit a “Contact” form, under “Responsible Social Gameplay Options” to ensure you can take a short break from gameplay. During this time, you will not be able to access or reactivate your account.

- (b) Self-Exclusion. - You may submit a “Contact” form, under “Responsible Social Gameplay Options” to suspend your account for a longer time period (choosing from 6 months, 1 year, 3 years, 5 years, or indefinitely). During this period you will not be able to access your account and you will be unsubscribed from marketing communications. If your account has been verified, the Company will use reasonable efforts to arrange for any funds remaining in your account to be redeemed (assuming all other requirements, including our minimum redemption threshold, are met). For a defined self-exclusion, your account will automatically reactivate once the chosen time period has lapsed. An indefinite self-exclusion must last for a minimum of 6 months, and a 7 day cooling period will apply before the account is reactivated.
- (c) Permanent Closure. - You may contact the Company’s Customer Support team to permanently close your account, by sending an email to [support@sweepking.com](mailto:support@sweepking.com) with the subject line “Permanent Account Closure,” stating the reason for the closure. A permanent closure is irreversible and your account cannot be reactivated under any circumstances. You will be required to provide a “confirmation of understanding” to permanently close your account.

## **5. Self-Assessment**

If you think your or someone else's computer gameplay is becoming problematic, you may consider the self-assessment questions available at the following link: [https://www.mind-diagnostics.org/video\\_game\\_addiction-test](https://www.mind-diagnostics.org/video_game_addiction-test).

## **6. Support Organizations**

If your gameplay may have had, or is at risk of having, a negative impact on your mental health, finances or relationships with friends or family, you may consider the following help and support organizations:

- a) Counseling.
- i) Gaming Addicts Anonymous (GAA) (<https://www.gamingaddictsanonymous.org/>) describes itself as a fellowship of people who support each other in recovering from the problems resulting from excessive game playing.
- b) Credit Counseling.
- i) Financial Counseling Association of America (FCAA) (<https://fcaa.org/>) describes itself as a professional association whose members are financial counseling agencies. Its members assist hundreds of thousands of consumers each year with financial counseling services of all kinds, as well as debt management plans for the repayment of unsecured debts.
- ii) National Foundation for Credit Counseling (NFCC) (<https://www.nfcc.org/>) is a network of non-profit financial counseling agencies. It offers education and solutions to assist with managing debt and improving better financial futures for all.

These organizations are independent support services and are not in any way affiliated with the Company. They do not provide customer support or dispute resolution services. Should you wish to discuss any matter or complaint related to your Company's account, you can do so by contacting our Customer Support team at [support@sweepking.com](mailto:support@sweepking.com).

## **7. Education Information on Responsible Gameplay**

### **(a) Principles of Gameplay**

- (i) Randomness. Game round outcomes are completely random. A player's results cannot be predicted and are independent of past or future game outcomes.
- (ii) Return to Player (RTP). RTP is the average return on the winnings and prizes over the lifetime of a slot-type game. For example, if a slot type has a 6% advantage, then the average RTP will be 94%.
- (iii) Advantage. All casino-type games are designed with a slight advantage that favors the operator.

### **(b) Common Misconceptions**

- (i) "I'm due for a win." – When participating in casino games, you cannot predict when you're going to win. As noted above, all game round outcomes are random.
- (ii) "The longer I play, the greater the chance that I'll win." – As mentioned in (i), all outcomes are random. Time spent on a game does not affect your chances of winning.
- (iii) "I always win with my lucky charm and pre-game ritual." – Charms and rituals don't increase your chances of winning. All outcomes are random.
- (iv) "These games are rigged." - The Random Number Generator (RNG) used in all Company's games is independently certified by independent third-party vendors, who confirmed that the RNG uses a well-known algorithm to generate random numbers. The numbers generated by the RNG have been tested for statistical randomness. Independent third-party vendors have found that number sequences are unpredictable, non-repeatable, and uniformly distributed.

### **(c) Tips for Safe & Responsible Gameplay**

- (i) Avoid participating in gameplay while you are feeling upset or emotional, or while you are intoxicated.
- (ii) Take frequent breaks during your gameplay sessions.
- (iii) Avoid canceling withdrawals.
- (iv) Gameplay is merely a way to have fun and engage in entertainment. Do not view it as a source of income or a way to escape from reality.
- (v) Participate in gameplay only with money that you can afford to spend.

- (vi) Set a budget for your gameplay and don't exceed it.
- (vii) Prior to beginning a gameplay session, set a time limit for your session and stick to it.
- (viii) Understand how games work before playing and always remember that the results are random.
- (ix) Never let gameplay affect your employment, relationships, health, or other commitments.

(d) What is Problematic Gameplay?

Factors that may contribute to problematic gameplay may fall under the following categories:

- (i) Financial. Your gameplay may be problematic if you (i) cannot pay your bills, (ii) are borrowing money to meet your expenses, (iii) are purchasing beyond your means, (iv) find yourself lying about the amount of money spent on playing, or lying, borrowing, stealing, or committing fraud to get money to play, (v) are facing eviction, loss of your home, or repossession of valuables such as your car.
- (ii) Family. Your gameplay may be problematic if you (i) have an unhappy home environment, (ii) find yourself putting gameplay above friends or family and missing family events and gatherings, (iii) experience disconnection and disassociation from family members, or (iv) find yourself hiding gameplay behavior from significant others.
- (iii) Employment. Your gameplay may be problematic if you (i) miss work and stay home for gameplay, (ii) experience reduced productivity and competence at work, or (iii) lose your job.
- (iv) Health. Your gameplay may be problematic if you experience (i) anxiety, (ii) depression, (iii) isolation, or (iv) increased stress. This can include experiencing frustration when you are not playing, a constant need to increase the level of play to reach the same levels of fulfillment and excitement, or playing in order to escape from the stress of life.

(e) Computer Game Behavior Disorders (“CGBDs”)

- (i) Definition. Although multiple definitions exist, CGBDs can be defined as a pattern of gameplay behavior characterized by impaired control over playing, increasing priority given to playing over other activities to the extent that playing takes precedence over other interests and daily activities and/or responsibilities, and continuation or escalation of playing despite the occurrence of negative consequences.
- (ii) Evaluating. Generally, for a computer game disorder to be diagnosed, the behavior pattern must be of sufficient severity while resulting in significant impairment of personal, family, social, educational, occupational, or other important areas of functioning, and should normally have been evident for at least 12 months.

- (iii) Assistance. If you or someone you know may have a CGBD, you should seek help from a qualified medical professional and research CGBD. We have compile some materials provided below, but other materials exist online and in print.

- (1) <https://www.smartmobilegamers.org/>

- (2) <https://www.npr.org/2019/05/28/727585904/is-gaming-disorder-an-illness-the-who-says-yes-adding-it-to-its-list-of-diseases>

- (3) <https://www.psychiatry.org/patients-families/internet-gaming>

## **8. Player Protection Policy**

- (a) Protection of the Vulnerable. You should ensure that the decision to play on the Company's Platform is your own personal choice and responsibility. We do not recommend playing on our Platform if you: (i) are being treated or are in recovery for an addiction/dependency, (ii) are under the influence of alcohol or any other substance, (iii) are currently experiencing financial difficulty or a traumatic life event, (iv) do not understand how to play the games, or (v) have any mental health concerns, cognitive impairment or brain injury.
- (b) Protection of Minors. The Company has identity checks in place to mitigate and prevent the risk of underage gameplay using our Services. If you share your mobile phone, tablet, laptop or computer with friends or family who are under the legal age to participate in online social gameplay, we recommend that you restrict their access to our Platform by using one of the below services:
  - (i) Net Nanny (netnanny.com) – a filtering software designed to protect children from inappropriate web content
  - (ii) CyberSitter (cybersitter.com) – a filtering software that allows parents to block sites from access by children