

**InPlay Innovation, Inc.**

**RESPONSIBLE GAMING POLICY**

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**I. Legal Statement**

The recipient of this document may use it solely and exclusively to better understand InPlay’s Responsible Gaming Policy. This document may not be used for any other purpose and shall not be distributed or disclosed to any third party. Furthermore, the recipient will use all reasonably diligent means to protect against any unauthorized use, distribution, or disclosure of the Policy. The Company reserves the right to change this Policy and any of its contents from time to time without notice.

**II. Purpose**

InPlay Innovation, Inc. (“InPlay” or the “Company”) is committed to ensuring that its platform is operated in a secure, fair and socially responsible way. InPlay’s aim is to endorse and encourage Responsible Gaming (“RG”) amongst its players, employees and stakeholders. Responsible Gaming encompasses the processes, tools and resources that allow players to have a fair and safe experience with the Company, while protecting them from problem gaming issues. In addition, InPlay is committed to upholding the licensing objectives and compliance frameworks of the Company’s gaming regulators.

As part of this Policy, InPlay will:

- Ensure compliance with all applicable federal and state laws regarding Responsible Gaming and player protection.
- Provide easily accessible, clear, and meaningful information to players regarding Responsible Gaming tools and restrictions so that they can make informed choices about using InPlay’s platform and services.
- Inform players or prospective players about the help and assistance they can utilize should they experience any signs of problem gaming .
- Make all reasonable efforts to avoid marketing to minors as defined by each state in which InPlay conducts business.
- Make all reasonable efforts to avoid marketing to self-excluded players.
- Ensure that its marketing and advertising efforts are responsible and contain the relevant Responsible Gaming information as required by each state in which InPlay conducts business.

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### **III. Scope**

This Policy will apply to the full lifecycle of a player, as follows:

- During the creation and registration of a player's monetary account with InPlay;
- During the activity and participation of a player on the site including the use of Responsible Gaming tools;
- Following the limitation/restriction or closure of a player's account
- The above actions will be conducted on an ongoing basis to ensure InPlay is in compliance with any applicable laws or regulations.
- State specific regulation will be outlined in the Appendices at the end of this Policy.

### **IV. Registration & Verification**

#### **a. Prohibition of Underage Players - Identification and Verification**

- Participation in gaming by an underage player is prohibited.
- Before a player is able to complete registration and begin their play on the site, InPlay will ensure that the player is of legal age to do so.
- InPlay will check the name, age and address of an individual at registration.
- The age of the player must be verified using reliable and independent sources.
- In the event that a player is confirmed as a minor, InPlay will undertake the relevant steps as required to block that player's access.

#### **b. Duplicate Accounts**

- InPlay will take all reasonable steps to ensure that a player is only able to register, open and maintain one active account.
- Any duplicate accounts will be flagged and closed by InPlay. This process allows the Company to comply with its fraud and security responsibilities, but it also allows InPlay to prevent players who may wish to circumvent any Responsible Gaming tools set on their initial account.

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**c. Credit to Players**

- InPlay will not provide players with credit.

**d. Responsible Gaming Tools**

InPlay wants our players to have an entertaining and fun experience on our site. We also want our players to gamble responsibly. In order to accomplish both goals we have established and will continue to create various tools that a player can use in order to better control their level of gameplay.

InPlay will continuously review this policy in order to implement best practices to effectuate a robust Responsible Gaming environment. Currently, InPlay will offer the following Responsible Gaming tools that are described more fully below: .

- Deposit limits;
- Spending limits;
- Time outs

**d.1 Deposit Limit**

A deposit limit will limit the amount a player can deposit during a certain period of time (daily, weekly, or monthly). Once they have reached this sum they will not be able to make any new deposits until their limit has reset. Deposit limits may be reduced at any time, but increasing the deposit limit may only be done upon customer confirmation at the start of the following calendar period. Customers will receive a notification if they attempt to exceed the limit and the deposit will be prevented.

**d.2. Spending Limits**

This tool will limit the amount a player can spend during a certain period (daily, weekly, or monthly). The player will be able to wager up to the amount they have chosen. Spending limits may be reduced at any time, but may be increased only at the start of the next applicable calendar period.

**d.3 Time Out**

A player may choose to take a time out -- a designated time frame to take a break (72 hours, 7 days, or 30 days). During this time, the player will only be able to withdraw funds from their account. The ability to enter contests and/or deposit additional funds will reopen automatically once the chosen period has expired.

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**V. Self-Exclusion / Restriction**

Self-exclusion is a tool for players who are experiencing issues with problem gaming. During the time the player is self-excluded and they will only be able to withdraw funds from their account. InPlay will use all reasonable efforts to ensure self-excluded players will not receive marketing communications from the Company.

Whether a third party can self-exclude a player is state-specific and can be found in the relevant Appendix at the end of this Policy.

**VI. Responsible Gaming Information**

InPlay will ensure that all relevant Responsible Gaming and related information is easily accessible to players. This information contains details of organizations and bodies that provide help and assistance to problem gamers and their families.

In providing and directing players to these sources for assistance, InPlay's aim is to ensure that Players with a gaming problem will get help and assistance from a reputable source with expertise in this area.

**VII. Player Activity Monitoring**

Player activity will be monitored for behavior that may indicate a possible concern or responsible gaming issue. If concerns are identified, InPlay may contact the player to determine whether these concerns are warranted and whether further actions (including account restrictions) are appropriate. Activity monitored may include, but is not limited to:

- Time played;
- Number of payment methods used;
- Changes to player-imposed deposit limits;
- Canceled withdrawal requests; and
- Number or frequency of time-out or self-exclusion requests.

**VIII. Advertising**

**a. Prohibitions on Advertising to Minors**

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InPlay will not market exclusively or primarily to minors, according to the definition of minor in each state and/or as specifically defined in any rules or regulations relating to pay-to-play gaming products in any jurisdiction. In order to ensure that InPlay's marketing does not target minors, the Company will:

- Require all partner media outlets, websites, or other entities to agree to take all reasonable measures to not target minors on behalf of InPlay;
- Make all reasonable efforts to ensure that advertising networks do not place InPlay material on any websites that are aimed exclusively or primarily at minors;
- Not use any search engine optimization terms that target exclusively or primarily minors;
- Require that individuals or other entities speaking on behalf of InPlay on television, radio, or online outlets understand and acknowledge this aspect of the InPlay Marketing Policy; and
- Ensure that in-person promotional events are staffed by individuals that understand and acknowledge the InPlay Marketing Policy.

**b. Prohibitions on Marketing to Self-Excluded Players**

InPlay will automatically prevent self-excluded players, third party-excluded players, or players otherwise barred from participating in InPlay contests from receiving marketing or direct contact via the following methods:

- Email
- Mail
- App push
- Calls / Texts

**IX. Socially Responsible Marketing**

InPlay will ensure that marketing communications do not suggest that gaming is a solution to financial concerns, an alternative to employment, or a way to achieve financial security. InPlay will make information about responsible play available to consumers, clearly and conspicuously, on its website and mobile applications.

InPlay will communicate the location of such resources in each advertisement, landing page, or other location referencing pay-to-play games. The responsible play information will include the name and toll-free number of at least one reputable source where problem gamers can receive assistance.

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**X. Periodic Review**

InPlay will conduct a review of its Responsible Gaming Policy annually or sooner if required. Any material changes to the Policy will be reviewed and approved by the Compliance Officer or their designee.

**XI. Record Retention**

InPlay will maintain all documentation related to its Responsible Gaming Policy per the Company's Data Retention policy in conjunction with state specific regulatory stipulations. This will include player history and transactions, as well as, marketing and advertising material.

**XII. Resources**

- [American Gaming Association](#)
- [BetBlocker](#)
  - a free tool designed to help customers control their gaming by blocking access to over 18,000 gaming websites
- [Cambridge Health Alliance Division on Addiction](#)
  - [Your First Step to Change](#) is a collection of self-change toolkits available to the public, free of charge.
  - [The BASIS](#)'s mission is to minimize the addiction's harmful effects by providing the general public, treatment providers, policy makers and others with access to addiction research
- [EPIC Global Solutions](#)
- [International Center for Responsible Gaming](#)
- [National Council on Problem Gambling](#)
  - [Help by State](#)
  - [FAQs](#)
- [Kindbridge Research Institute](#)

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