



**EDGE Markets Inc.**

**Responsible Gaming Policy**

**Version 1.0**

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## 1. Legal Notice

This Responsible Gaming Policy (the “Policy”) may only be distributed pursuant to a confidentiality agreement between the recipient and EDGE Markets Inc. (“EDGE” or the “Company”). The recipient of this document may use it solely and exclusively to better understand EDGE’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.

## 2. Purpose

EDGE is committed to ensuring that its operations are operated in a secure, fair, and socially responsible way and to endorse Responsible Gaming (“RG”) amongst its users, employees, and stakeholders. Responsible Gaming encompasses the processes, tools and resources that allow users to have a fair and safe experience with the Company, while protecting them from problems associated with gambling issues.

*EDGE is not a gaming company, does not offer betting, is not a regulated casino or sportsbook or fantasy sports operator and does not offer games of chance or games of skill or any other kind of gambling or betting activity. EDGE does, however, work closely with regulated organizations in the gaming industry and its customers are invariable users of gaming and sports betting products and services. As a responsible member of this community, EDGE wants its users to enjoy it and others’ services responsibly and does not want its own services to be used irresponsibly. As a best effort and demonstration of alliance with the gaming community, EDGE has voluntarily developed this Responsible Gaming Policy.*

This Policy applies to all of EDGE’s personnel, and expresses a commitment to:

- Provide easily accessible, clear, and meaningful information to users regarding Responsible Gaming tools and restrictions so that they can make informed choices about using EDGE’s platform and services
- Inform users or prospective users about the help and assistance they can utilize should they experience any signs of problem gambling
- Make all reasonable efforts to avoid marketing to minors
- Make all reasonable efforts to avoid marketing to self-excluded users
- Ensure marketing and advertising is responsible and contains the relevant Responsible Gaming information

## 3. Registration & Verification

### 3.1. Prohibition of Underage Users - Identification and Verification

Before a user is able to complete registration, a user must have a relationship with a sports book. Those sports books verify the legal age for users depending on state and type of play allowed by age in each state.

In addition, users must self-declare their age at the time of onboarding.

In the event that a user is confirmed as a minor, EDGE will undertake the relevant steps as required to block that user’s access.

### 3.2. Duplicate Accounts

EDGE will take all reasonable steps to ensure that a user is only able to register, open and maintain one active account.

Any duplicate accounts will be flagged and closed by EDGE. This process allows the Company to comply with its fraud and security responsibilities, but it also allows EDGE to prevent users who may wish to circumvent any Responsible Gaming tools set on their initial account.

## 4. Responsible Gaming Features

EDGE offers a platform to users that is essentially self-limiting and entails learning and responsible use as a function of its use. These limitations and restrictions act as controls that support responsible gaming and mirror those controls that traditional gaming operators have in place. They include:

- Deposit Limits
- Tier Level Limits
- Universal Card Limits
- Credit-Equity Ratio Limits
- Dashboard transparency
- Partner transparency
- Cool-down self-exclusion periods
- Permanent self-exclusion
- User Activity Monitoring

### 4.1. Deposit Limits

A deposit limit is initially set to \$50 per Boost Credit until the user upgrades by using the service. As a user learns and responsibly uses the service (by using the service as intended and repaying within the parameters of the platform) the user can increase their deposit limit to \$2,500.

At no point can a user exceed the \$2,500 deposit limit, and initiation of a further \$2,500 deposit is dependent entirely on full repayment of the initial \$2,500.

### 4.2. Tier Level Limits

Tier Level limits are a feature of the EDGE Boost Credit service. All users start at Tier 1 which is a \$50 limit on the user's Boost Credit. The \$50 Boost Credit at Tier 1 must be repaid before the user can upgrade to the next tier, and so on from Tier 1 up to Tier 5 which has a \$2,500 limit.

In addition, each Tier must be "used" between one and three times before a user can upgrade to the next Tier. This limits the user to the deposit and Boost Credit limit for a certain period of time or a certain number of Boost Credits. For example, to upgrade from the deposit limit of \$500 in Tier 3 to the deposit limit of \$1,000 in Tier 4, a user must deposit and repay at least \$1,500; or in other words, must purchase a \$500 Boost Credit three times consecutively (and repay it three times consecutively) before upgrading to Tier 4.

### 4.3. Universal Card Limits

In addition to Tier Level limits and deposit limits, users are also able to set limits on usage of their card and their access to Boost Credits. Irrespective of a user's Tier Level, a user can set a maximum usage of any dollar value for any period of daily, weekly or monthly use.

Universal Card Limits serve to cap usage of the card to any limit agreed to by the user. For example, if a Tier 3 user with a maximum Boost Credit capability of \$1,000 at a time elects to limit their card to \$2,500 per month, they will be limiting themselves and the user will be unable to do the following:

- Use their full Boost Credit of \$1,000 more than 2.5 times, because their card is limited to \$2,500 of total use
- Upgrade to Tier 4, as Tier 4 requires a repayment of \$3,000 in order to Upgrade
- Use the card for more than \$2,500 during the month

Universal card limits can be used to manage use of the card relative to a user's personal finances in the same way that a credit limit on a credit card can be used to limit the use of a traditional card, supporting a user's responsible gaming within their financial capacity.

### 4.4. Credit-Equity Ratio Limits

EDGE also supports users in responsible play by allowing users to fund their Boost Credit activity with no more than 25% of the real-time balance of the checking account used to fund the Boost account. In this scenario, a Tier 5 user with a \$2,500 Boost Credit capability would require a checking account balance of at least \$10,000 in order to fund and access a single Boost Credit.

The result of the credit-equity ratio limit is that users must have four times the equity of any Boost Credit they wish to fund and play with, supporting users in responsible play within their financial capacity. A further result of a limit based on credit-equity ratio is that it is impossible for a user to "clean-out" their checking account to use the Boost Credit service.

### 4.5. Dashboard transparency

The EDGE platform offers users transparency as a function of its service. Users often use more than one gaming platform at a time to access various features and odds from each of those platforms. For example, a user might use one betting platform for all fantasy sports and use a completely different platform for betting on professional tennis games. By using the EDGE platform, users can access all their Boost Credits across both platforms using the EDGE Dashboard feature.

In this way, the user can see all outstanding credit and pay-ins across all their gaming activity, supporting the user in efforts to remain within their limits for responsible play.

### 4.6. Partner transparency

EDGE also allows users to automatically prepare user activity reports and deliver them to any email address. The email address may be a user's sponsor, partner, a friend or an accountant. Partner transparency can be used as a commitment device to support and encourage responsible play.

### 4.7. Cool-down self-exclusion periods

The user can choose to exclude themselves from purchasing any Boost Credits for any timeframe up to 30 days. During this time, the user will be unable to access the purchasing and playing features of their account. The account re-opens for normal usage after the cool-down period.

A cool-down allows a user to pause from using the service, for example to skip a weekend of play, to prevent play for a certain event, or simply to “cool-down”. During the time the user is on a cool-down, they cannot use the platform and will not receive any marketing communications from the Company.

#### 4.8. Permanent self-exclusion

Self-exclusion is a tool for users who are experiencing issues with problem gaming or who otherwise want to bar themselves from using the platform. Any user may request a permanent self-exclusion, and EDGE will work with that user to permanently disable the service for that user’s account within the limits of any repayment obligations and allow the user to withdraw their own funds.

EDGE will honor requests of users that choose to permanently self-exclude by permanently barring them from accessing the service or opening further accounts. The user will not be able to login or use the platform and will not receive any marketing communications from the Company.

## 5. Responsible Gaming Information

EDGE ensures that all relevant responsible gaming and related information is easily accessible to users during their platform use. This information contains details of organizations and bodies that provide help and assistance to a user and affected third parties should someone become a problem gambler.

In providing and directing users to these sources for assistance, we can ensure that the user and any affected third party will get the help from a reputable source.

Responsible gaming information is presented to users via the homepage before opening an account, and any time the user accesses the homepage to open their account in the future. Homepage information includes links and information to 1-800-GAMBLER which is a popular national problem gambling resource.

Responsible gaming information is also presented to users as part of the user agreement, which users are required to read and sign prior to opening an account.

## 6. Advertising

### 6.1. Prohibitions on Advertising to Minors

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

## 6.2. Prohibitions on Marketing to Self-Excluded Users

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

- Email
- Mail
- App push
- Calls/Texts

## 7. Socially Responsible Marketing

EDGE 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. EDGE will make information about responsible play available to consumers, clearly and conspicuously, on its website and mobile applications.

EDGE will communicate the location of such resources, where a user could easily identify it 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.

## 8. Training

EDGE offers training to users and requires training for employees in the following ways:

### 8.1. User training

The Boost Credit product is relatively unique, and at least is new to the market and EDGE recognizes that education and training will be required to assist users in accessing and using the service. As part of the primary EDGE Boost training video that it expects most users to view as an introduction to the service, the splash screen for the training states “For help with a gambling problem or support resources, call 1-800 GAMBLER”. The final segment of the user training video shows users several of the responsible gaming features in place with EDGE and the Boost Credit product, and again directs users to responsible gaming resources.

### 8.2. Employee training

Responsible gaming training and the EDGE responsible gaming features are a component of all employee training.

Training materials may include but are not limited to the following information:

- What the policies and procedures are including what Responsible Gaming tools are available and how these can be activated
- Spotting the markers of harm, for example how to identify problem gaming
- How to provide assistance to a user who may be at risk of harm or be a compulsive gambler

## 9. Periodic Review

EDGE 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.