

CENTRUM Operations Manual



CENTRUM GLOBAL B V

VERSION 2026-01
CENTRUM GLOBAL B V

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e-Management N.V.

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1 Introduction & Purpose

1.1 Purpose

This Operations Manual defines the operational, control, and governance framework under which CENTRUM GLOBAL B.V. ("CENTRUM") conducts its licensed online gaming activities under the Curaçao National Ordinance for Games of Chance (LOK) and related regulations.

The manual ensures:

- Lawful and compliant operations – All activities are carried out within the scope of CENTRUM's gaming license and applicable laws, with clear procedures to prevent regulatory breaches.
- Protection of players and player funds – Operational processes safeguard funds belonging to CENTRUM's professional players, ensuring segregation, accurate accounting, and timely withdrawals.
- Integrity and reliability of gaming services – Systems and processes are designed to ensure fair, transparent, and uninterrupted operation of the pari-mutuel wagering platform.
- Clear accountability and operational consistency – Roles, responsibilities, and workflows are documented so that tasks are performed consistently regardless of personnel changes.

1.2 Applicability

- All departments (Operations, IT, Finance, Compliance, Customer Support) – Each department must follow the relevant sections of this manual in day-to-day operations and decision-making.
- All CENTRUM directors, employees, and key functionaries – Individuals in key roles (e.g., Compliance Officer, MLRO, IT Head) are accountable for ensuring adherence within their area.
- Relevant contractors and outsourced service providers – Where functions are outsourced (e.g., hosting, KYC services), providers must follow agreed procedures aligned with this manual.

1.3 Governance

- The Board of Directors retains ultimate responsibility for governance and oversight of CENTRUM's operations.
- The Compliance Officer ensures that this manual is maintained, observed, and updated in line with regulatory expectations.
- Senior management ensures that staff are trained on relevant sections and that operational practices reflect the content of this manual.

2 Legal & Regulatory Framework

2.1 Legal Basis

- CENTRUM operates under a license issued in Curaçao in accordance with the National Ordinance for Games of Chance (LOK).
- All operations must remain within the permitted license category and scope, including the non-retail, professional-only pari-mutuel model.

2.2 Regulatory Oversight

- The Curaçao Gaming Authority (CGA) oversees CENTRUM's compliance with applicable gaming laws and regulations.
- CENTRUM must cooperate fully with CGA information requests, inspections, and ongoing monitoring.

2.3 Regulatory Reporting

- CENTRUM submits required regulatory reports within prescribed timelines (e.g., periodic activity reports, incident notifications).
- Regulatory correspondence and submissions are documented and stored in a central repository for audit and reference.
- Records supporting regulatory filings shall be retained for a minimum of 5 years (or longer if required).

3 Corporate Structure & Governance

3.1 Legal Entity & Registration

- CENTRUM is incorporated as CENTRUM GLOBAL B.V. under Curaçao law.
- Company registration details, UBO information, and corporate changes are kept up to date and filed with relevant registers.

3.2 Physical Presence

- CENTRUM maintains the necessary registered office and, where required, local presence or representation to satisfy licensing conditions.
- Records required to be held in Curaçao are accessible to authorities on request.

3.3 Key Persons

- Key roles (e.g., Director(s), Compliance Officer, MLRO, IT Head) are identified and approved in accordance with CGA requirements.
- Role descriptions and responsibilities are documented and reviewed periodically.

3.4 Segregation of Duties

- Operational duties are segregated to reduce risk and prevent conflicts of interest. For example, staff responsible for reconciling player funds should not be able to unilaterally execute payments.
- Where CENTRUM's size limits full segregation, compensating controls (e.g., dual sign-off, enhanced review) are implemented.

4 License Scope & Maintenance

4.1 License Scope

- The Company shall operate strictly within the scope of its CGA license.
- CENTRUM's currently only operates non-retail, professional pari-mutuel wagering only.
- CENTRUM does not offer retail casino games, slots, or mass-market sports betting directly to the public.
- Any new product or material change in business model is assessed for licensing impact before implementation.

4.2 License Maintenance

- License renewal dates, fees, and conditions are tracked by Compliance.
- Material changes (ownership, key persons, technical platform changes) are notified to the CGA as required.

4.3 Recordkeeping

- License documents, regulatory approvals, and correspondence are stored securely, indexed, and backed up.
- Records are retained for at least the minimum period prescribed by law and are accessible for inspection.

5 AML, KYC & Fraud Prevention

5.1 AML/CFT Framework

- The Company operates a risk-based AML/CFT program that includes customer due diligence (CDD), ongoing monitoring, and suspicious activity reporting.
- All professional players must undergo full KYC verification before account activation and funding.
- Transaction patterns are monitored for unusual activity, considering CENTRUM's typical high-volume, low-client-numbers model.
- Relevant staff receive AML/CFT training appropriate for their role, including red flags relevant to professional bettors.

5.2 Customer Onboarding (KYC)

- Identity verification is conducted before enabling withdrawals and, in practice, prior to any betting activity.
- Enhanced Due Diligence (EDD) applies to high-risk players (e.g., PEPs, high-risk countries).
- KYC documentation is securely stored, access-controlled, and subject to periodic refresh based on risk.

5.3 Transaction Monitoring

- Automated systems monitor large or unusual deposits/withdrawals, velocity of transactions, and deviations from expected patterns.
- Thresholds and rules are calibrated to CENTRUM's professional bettor profiles to minimize false positives while capturing genuine anomalies.
- Alerts are reviewed by Compliance and, where appropriate, escalated for further investigation.

5.4 Reporting & Escalation

- Suspicious activities are documented and escalated internally to the MLRO using a defined reporting template.
- Where warranted, formal reports are filed with the competent authority in line with legal timeframes and secrecy/tipping-off restrictions.

6 Responsible Gaming Operations

6.1 Responsible Gaming Policy

- A publicly available Responsible Gaming Policy is maintained
- Although CENTRUM serves professional, non-retail players, it acknowledges responsible gaming principles and incorporates them proportionately.

6.2 Player Protection Tools

- The platform provides, where applicable, self-exclusion or account closure mechanisms on request.
- Cooling-off or temporary suspension options may be enabled where appropriate.
- Clear information on risks of gambling and contact details for support services are made available, even though clientele are professional players.

7 IT & Platform Operations

7.1 Platform Architecture

- The trading and wagering platform is designed for high-volume pari-mutuel betting, with robust performance and redundancy.
- System components (frontend, backend, database, integrations) are documented in architecture diagrams.

7.2 Change Management

- Application and infrastructure changes follow documented change management procedures aligned with the IT Policy.
- Changes are planned, tested in non-production environments, and approved before deployment.

7.3 Third-Party Integrations

- External data feeds (e.g., race data, tote connections) and service providers are onboarded with due diligence and tested for reliability.
- Integration failures and data discrepancies are monitored and resolved promptly.

7.4 Data Security

- Player and financial data is encrypted in transit and at rest.
- Regular backups are performed and tested.

7.5 Monitoring & Incident Detection

- Systems are continuously monitored for:
 - Downtime
 - Intrusions and Data breaches

7.6 Incident Response

- Incidents are classified, documented, and escalated.
- Significant incidents are reported to the CGA within required timelines.

8 Risk Management & Compliance

8.1 Risk Assessment

- CENTRUM performs periodic risk assessments covering operational, technical, financial, and compliance risks.
- Risks are categorized (e.g., low/medium/high) and mitigation actions are documented and tracked.

8.2 Compliance Monitoring

- Ongoing compliance checks ensure adherence to AML, IT, responsible gaming, and licensing requirements.
- Findings are reported to senior management, and remediation steps are monitored to completion.

9 Finance & Player Funds

9.1 Accounting & Reconciliation

- CENTRUM maintains accurate accounting records reflecting all player funds, operational balances, and settlements.
- System records are reconciled regularly with bank statements and other financial records.

9.2 Player Funds Protection

- Player funds are clearly identifiable and recorded/protected.
- Procedures exist to ensure prompt treatment of withdrawals and prevention of misuse of player balances.

9.3 Payments & Withdrawals

- Deposits and withdrawals are accepted only via approved channels and to/from verified banking details.
- Withdrawal requests are subject to checks for AML/CTF concerns, KYC completion, and account reconciliation.

10 Customer Support & Complaints

10.1 Customer Support Operations

- CENTRUM provides support via designated channels (e.g. email and phone and various messaging groups) during specified business hours.
- Support requests are logged, categorized (e.g., general query, technical issue, financial query), and tracked to resolution.

10.2 Complaints Management

- A documented Complaints Policy governs how formal complaints are received, logged, investigated, and resolved.
- Players may use the downloadable complaint form and submit it to the designated complaints email address.
- Complaints are acknowledged within a defined timeframe and resolved as promptly as possible

10.3 Alternative Dispute Resolution (ADR)

- If a player is dissatisfied with the outcome of a complaint, they may escalate to an independent ADR provider (ADR TO BE CONFIRMED) once appointed.
- CENTRUM agrees to cooperate with the ADR process and to abide by decisions where required by regulation, without prejudice to players' legal rights.

11 Incident & Crisis Management

11.1 Incident Classification

- Incidents are classified by type (e.g., technical outage, security breach, data loss, payment failure) and severity (e.g., low/medium/high/critical).
- Classification guides the urgency of response and escalation procedures.

11.2 Reporting Procedures

- Staff must promptly report incidents through internal channels (e.g., incident ticketing or direct notification to IT/Compliance).
- Incidents of a serious or regulatory nature are escalated to senior management and, where required, to CGA or other authorities.

11.3 Post-Incident Review

- Significant incidents are followed by a post-incident review to identify root causes and corrective measures.
- Lessons learned (technical or procedural) are incorporated into updated controls and, where relevant, into this manual.

12 Audit & Assurance

12.1 Internal Audits

- Periodic internal reviews or audits are undertaken to evaluate the effectiveness of controls described in this manual.
- The scope may include AML, IT controls, financial reconciliations, and regulatory compliance.

12.2 External Audits

- Where required, CENTRUM engages external auditors or consultants to review specific areas (e.g., financials, security, or AML).
- The Company cooperates fully with CGA inspections and provides requested information promptly.

12.3 Continuous Improvement

- Audit findings and recommendations are documented and tracked until resolved.
- Controls, processes, and documentation are enhanced over time based on audit outcomes and operational experience.

13 Training & Staff Awareness

13.1 Mandatory Training

- Staff must complete mandatory training covering AML/KYC, responsible gaming, data protection, and cybersecurity awareness.
- Training is conducted on at least an annual basis, with content updated to reflect current risks and regulations.

13.2 Training Records

- Attendance and completion records are maintained for all mandatory training.
- Records are available for inspection by management or regulators on request.

14 Document Control & Review

14.1 Version Control

- This Operations Manual is version-controlled and stored in a central, access-controlled repository.
- Changes are logged with version number, date, and description.

14.2 Review Cycle

- The manual is reviewed at least annually or sooner in response to regulatory, business, or system changes.
- Updates must be approved by senior management, and relevant staff are informed of material changes.

15 Version Control

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Intro

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Document created by Bryon Finies (bryon.finies@hbmgroup.com)

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