

Business and Corporate Information Form

Attachment 10.5

Ragnarok Corporation N.V.
App. No. OGL/2023/0084

Business Plan for Ragnarok Corporation N.V.

Application for Curacao Gaming License (OGL/2023/0084)

Executive Summary & Overview

Ragnarok Corporation N.V. ("**Ragnarok**") trades under the brand name Pinnacle via the URL Pinnacle.com ("**Pinnacle**"). Pinnacle boasts a 25-year history and has been a sub-licensee of Antillephone N.V. in Curacao since 2013. Since 2013, the wider Pinnacle Group has expanded its operations multi-nationally to offer online sports betting and i-gaming services and now holding licenses from Malta, Sweden, Italy, and Ontario. Pinnacle has a significant presence in Curacao, employing over 80 staff locally at its headquarters.

This business plan is intended to demonstrate Pinnacle's desire to continue its operations from Curacao and seek approval from the Curacao Gaming Control Board ("**CGCB**") for a gambling license to be issued, and eventually grandfathered under the LOK.

Early Years

The Pinnacle Group was founded in 1998 and quickly gained a reputation for offering competitive odds and high betting limits. Pinnacle differentiates itself from other sportsbooks by focusing on sharp odds and catering to professional bettors rather than casual players. Rather than relying primarily on bonuses, promotional offers, and other marketing gimmicks, Pinnacle focuses on providing the best overall odds possible for the sports markets in which it operates.

Leader in Esports

Pinnacle became a pioneer in esports betting, recognizing the growing popularity of competitive gaming. The website started offering esports markets early on, showcasing a keen understanding of the emerging esports industry. To this day, Pinnacle is a market leader in esports and as a consequence, Pinnacle has developed a reputation for being one of the go-to operators for esports betting enthusiasts. The company's expertise in esports extends to a wide range of games, including popular titles like Dota 2, League of Legends, Counter-Strike: Global Offensive (CS:GO), and more. Pinnacle's competitive edge is maintained thanks to a diverse range of esports events and tournaments.

Pinnacle is actively engaged with the esports community through sponsorships and partnerships: supporting various esports tournaments and events and aligning with the growth and development of the esports industry.

Transition to Pinnacle.com

In a rebranding effort, Pinnacle Sports transitioned to Pinnacle.com to reflect its broader range of offerings beyond traditional sports betting. This shift coincided with the inclusion of esports markets and content as well as the launch of Pinnacle's online casino offering.

Industry Recognition

Pinnacle has gained recognition within the online gaming industry for its innovative approach, transparency, and commitment to providing a platform for both professional and recreational bettors. Pinnacle is often the recipient of industry awards in the sports and esports betting categories from respected publications such as eGaming Review (EGR) and SBC. This demonstrates Pinnacle's position as a true global player within the online betting and i-gaming arena. Consequently, Pinnacle recognizes its duty and privilege to apply for and operate under a gambling license issued by the CGCB. Pinnacle fully intends to continue to uphold its legacy as a reputable and customer-centric online gaming operator.

The Pinnacle Difference

With 25 years of experience in dealing with players from more than 100 countries, Pinnacle offers to customers exactly what they want – an easy to navigate sportsbook, numerous wagering options from futures to arbitrage strategies, data rich entertainment widgets, and unbeatable value odds.

Offering better value than other sportsbooks and betting exchanges as a price differentiator, it's not just about the odds. Pinnacle respects the traditional bookmaking techniques that brought it here and strives to give its customers a classic betting experience while still offering modern features for interactivity and payment options. Through its history, Pinnacle has focused on building trust within the betting community through its integrity, values, and educational approach – not to mention by providing a high level of customer satisfaction to complement its unique selling propositions.

Known as “the Pinnacle line,” Pinnacle’s impressive ability to open the betting markets and set the most competitive odds for US sports is notorious. Pinnacle is revered for its skillful, cutting-edge risk management with proprietary models and algorithms to offer best-in-class odds and boasts a reputation amongst its competitors and players as one of the world’s most credible bookmakers. It’s in Pinnacle’s DNA to apply the same methods and processes to offer just-as-competitive pricing and welcome winners when earned on Pinnacle.com.

Management Structure

Leadership and Executive Management Team

- **Magnus Hedman, Chairman of the Board and Interim Chief Executive Officer (CEO)**

Mr. Hedman started his career as a financial trader in banking and investment in the 1990s, before he began trading on betting exchanges and creating an in-play soccer trading model where he left the financial industry to found the company, Touchbet Limited – a business-to-business risk management and trading technology company focusing on live soccer wagering.

Hedman became the majority shareholder and Chairman of the Board of Pinnacle in 2014 upon the acquisition of a majority stake in the company, installing in the company new leadership and a new strategic vision. In 2015, Hedman acquired Sporting Index, a business-to-business technology and odds-making company servicing the global sports betting market and led it through market expansion across several continents into to 2019 when he sold each of Sporting Index and Touchbet to FDJ, France’s national lottery company. As an investor and board member, amongst his investment portfolio are gaming companies and philanthropic endeavors whereby Hedman serves in leadership positions guiding companies on their strategic initiatives in the technology and gaming industries.

As the majority shareholder with controlling interest and voting rights, Chairman of the Board, and Interim Chief Executive Officer of The Pinnacle Group, Mr. Hedman is responsible for overseeing the vision, mission, and strategy of the organization and the leadership of the Executive Management team. Hedman is responsible for focusing the organization on its strategic initiatives, delivering value for shareholders, overseeing Pinnacle’s operational and financial undertakings, and ensuring a strong governance framework.

- **Lampros Klironomos, Chief Finance Officer (CFO)**

Mr. Klironomos has more than 23 years of comprehensive working experience in finance, audit, and operational roles worldwide. He started his career as Senior Auditor at statutory audit firm and progressively assumed senior and executive roles in audit, logistics, and operations in the food,

insurance, and medical industries. Prior to joining Pinnacle, Klironomos held the position of Group Chief Internal Audit Officer at a publicly listed gaming company worth \$2B and subsequently Chief Financial Officer of the \$220M US major subsidiary. During his tenure, he was responsible for the finance transformation and the corporate change management which led to outstanding profit growth, generating from a combination of improved business planning and cost rationalization initiatives.

In his current role as Chief Finance Officer for Pinnacle, Mr. Klironomos oversees all facets of the Pinnacle Group's finance department and is responsible for the financial formulation of the organization's future strategic direction and tactical initiatives for growth plans. Klironomos is directly responsible for developing Pinnacle's finance management strategies while overseeing Pinnacle's capital expenditure and budgeting processes, treasury management and cash forecasts, financial audit activities, and tax planning and compliance.

Mr. Klironomos is a holder of a Bachelor of Science in Economics, Masters of Science in Operations and CFE. Klironomos is a former Ambassador for the Gaming Sector and Scientific Associate of HACFE and Board Member/General Secretary of the HIIA & Scientific Associate of Transparency International. He has guest lectured and tutored at universities and public organizations.

- **Mauri Kuosmanen, Executive Vice President – Trading Technology**

Mr. Kuosmanen has more than a decade's experience in the gaming industry where he began his career building predictive models and automating decision-making across the i-gaming sector.

In his current role as EVP, Trading Technology, Mr. Kuosmanen leads development of Pinnacle's trading software and algorithms, oversees data engineering and analytics, and contributes significantly to sportsbook and trading strategy and innovation. Upon joining Pinnacle in 2014, Kuosmanen has extensively contributed to the core intellectual property development in multiple leading roles.

- **Aleksandra Sygiel, Chief Revenue Officer (CRO)**

Ms. Sygiel has nearly a decade of experience in the online gaming industry, where she began supporting business development, commercial, and communications efforts for leading online operators before joining Pinnacle in 2021. Prior to joining Pinnacle, she led the Business Development function at LeoVegas, a mobile-focused online casino operator, a tech unicorn listed on Nasdaq, and acquired by MGM Resorts in 2022.

In her role as Chief Revenue Officer, Ms. Sygiel leads marketing, international expansion, market insights, and product development teams toward revenue growth targets. Sygiel is directly responsible for revenue and commercial growth for Pinnacle's customer facing websites.

Ms. Sygiel holds a Master's Degree in Corporate Identity Management and another in Journalism.

- **Cindy Macintos, Chief People Officer (CPO)**

Ms. Macintos is a seasoned professional with over fifteen (15) years of experience working in the financial industry before joining Pinnacle in 2016. Macintos' expertise lies in cultivating strong company cultures and fostering talent to drive business success. With a proven track record of leadership in human resources, Macintos dedicates efforts toward implementing innovative solutions in human resources, people and talent management, and organizational development that align with strategic objectives to enhance employee engagement and company growth.

In her role as Chief People Officer for Pinnacle, Ms. Macintos acts as the driving force in shaping the workforce of tomorrow at Pinnacle. She oversees a global team of professionals and is directly responsible for talent acquisition, performance management metrics, employee experience, office management, and compensation and rewards.

Ms. Macintos holds an LLM degree from the University of Amsterdam and is actively engaged in volunteer work in her community. She is a regular participant and panelist at industry conferences and events where she shares her expertise on innovative human resources strategy and talent development.

- **Niki Metzgar-Schall, Group General Counsel**

Ms. Metzgar-Schall began her career in online sports betting and gaming serving as sole United States counsel to a global data, content, and technology supplier. Metzgar-Schall primarily specialized in rights and content acquisition with professional sports leagues, commercial and contractual matters for trading and risk management clients, corporate development and M&A, and market access and regulatory affairs across Europe, LatAm, and North America. After the 2018 repeal of the Professional and Amateur Sports Professionalism Act in the United States, Metzgar-Schall served as Head of Legal, US, where she began leading the United States' legal team to navigate the company's entry into the United States sports betting market to establish over 80% market share as a data supplier; eventually advising the company through a USD 2.4Bn public offering and successful NASDAQ listing. Prior to her career in gaming, Ms. Metzgar-Schall worked as an attorney in the United States in various roles in government and diplomatic affairs, energy and telecommunications, and corporate law.

In her current role, Ms. Metzgar-Schall serves as Group General Counsel for the Pinnacle Group, overseeing the company's Legal, Regulatory Affairs, Risk & Financial Crime, and Compliance programs. She is directly responsible for carrying out the initiatives of the Chairman of the Board regarding corporate governance, regulatory compliance, legal obligations and parameters, transactions, and corporate development.

Ms. Metzgar-Schall is an active and licensed member of the New York State Bar. She holds a Bachelor of Arts degree in Economics and Criminology from The Ohio State University and a Juris Doctorate from Arizona State University, Sandra Day O'Connor College of Law where she graduated magna cum laude. She has guest lectured gaming law courses in universities in the United States and is a frequent panelist at industry conferences and events.

Three-Year Business Plan Forecast

Continuation of Services

Pinnacle's three-year business plan is a commitment to continue to provide its current excellent betting and i-gaming products to its player database in various cross-border markets under a new CGCB license. We wish to caveat any projections below with the following industry recognized points:

- ***Regulatory Headwinds***

The regulatory environment plays a crucial role. Various countries, provinces, and/or regions have been updating or implementing regulations for online gambling. Pinnacle appreciates the need to navigate diverse and evolving regulatory frameworks to maintain and grow its business.

- ***Technological Advancements***

It is critical that Pinnacle can continue to evolve and advance its technology in such areas as mobile platforms, virtual reality, and artificial intelligence. It is vital that Pinnacle can develop in these areas without suffering from significant

regulatory creep through material increased compliance costs as these technology advancements greatly enhance usability to make the online gaming experience more immersive, engaging, and secure.

- *Responsible Gambling Developments*

Pinnacle recognizes the significance of maintaining robust player protection measures to have a sustainable business. Increased emphasis and excessive requirements introducing a point of friction to the user journey for responsible gambling practices and KYC/AML requirements may have a significant impact on customer acquisition, user retention and experience, and profitability.

- *Data Security and Privacy*

With the increasing reliance on digital platforms, the industry has been placing a heightened focus on data security and user privacy to build and maintain trust with customers. Pinnacle will be expected to spend an increasing level of resources in this area in order to counter fraud levels in areas such as affiliate traffic and online fraud rings.

- *Competitive Landscape*

The online betting industry remains highly competitive, with established operators and new entrants vying for market share. Pinnacle believes that differentiation through its market leading margins and customer experience will be key. However, as with every other bookmaker, Pinnacle remains at the mercy of sport seasonality, the sporting event calendar, and ultimately the results of sporting events.

- *Payment Service Providers*

The industry has been adapting to the challenging landscape of payment solutions for cross border operations. Increasingly, payment service providers have experienced their own regulatory headwinds in increased financial and banking compliance. As a result, some payment service providers may be less keen to support cross-border license holders in certain markets due to their evolving risk appetite under new, increased, and alternatively applicable financial and banking regulations.

- *Marketing and Partnerships*

Strategic marketing initiatives and partnerships, particularly with sports teams and events, have been common strategies to enhance brand visibility and attract new customers. However, cross border license holders are becoming increasingly challenged to find brand partners in certain markets which may curtail the ability to maintain brand recognition in some of Pinnacle's core markets.

With the above in mind please see the following three-year business plan, including projections, costs, and cash flow, for Pinnacle.

Income Statement				
USD (millions)	2024	2025	2026	
Sportsbook	\$ 72.5	\$ 68.2	\$ 65.0	
Casino	\$ 7.3	\$ 7.5	\$ 7.7	
Net Revenue	\$ 79.8	\$ 75.7	\$ 72.7	
Affiliate commissions	\$ 14.1	\$ 13.7	\$ 13.5	
Third party revenue share	\$ 1.7	\$ 1.6	\$ 1.5	
PSP Fees	\$ 4.7	\$ 4.5	\$ 4.3	
Data rights / live streaming feeds	\$ 5.1	\$ 4.8	\$ 4.6	
Marketing	\$ 3.4	\$ 3.2	\$ 3.0	
Gaming taxes and license fees	\$ 0.6	\$ 0.6	\$ 0.6	
Player bonuses	\$ 0.3	\$ 0.3	\$ 0.3	
Distribution expenses	\$ 30.0	\$ 28.7	\$ 27.8	
Payroll	\$ 21.0	\$ 20.4	\$ 19.9	
IT infrastructure	\$ 7.6	\$ 7.2	\$ 6.8	
Legal and professional	\$ 3.3	\$ 3.1	\$ 2.9	
Bad debt write offs	\$ 0.5	\$ 0.5	\$ 0.5	
Depreciation and amortization	\$ 0.1	\$ 0.1	\$ 0.1	
Travel and entertainment	\$ 1.1	\$ 1.0	\$ 1.0	
Subscriptions (non-IT infrastructure)	\$ 3.7	\$ 3.5	\$ 3.3	
Office costs	\$ 2.3	\$ 2.2	\$ 2.1	
Banking Fees	\$ 0.9	\$ 0.8	\$ 0.8	
Other	\$ 0.3	\$ 0.3	\$ 0.2	
Administration expenses	\$ 19.7	\$ 18.7	\$ 17.7	
Operating expenses	\$ 70.6	\$ 67.9	\$ 65.4	
Operating profit	\$ 9.2	\$ 7.8	\$ 7.3	
FX income / (cost)	\$ (0.4)	\$ (0.4)	\$ (0.4)	
Net interest income / (cost)	\$ 0.9	\$ 0.8	\$ 0.9	
Income Tax	\$ (0.3)	\$ (0.2)	\$ (0.3)	
Net profit	\$ 9.4	\$ 8.0	\$ 7.5	

Business Growth Strategy

Pinnacle's Mission Statement

Pinnacle is committed to delivering an authentic and gimmick-free betting experience and desires to participate in a piece of every bet placed across the world. To this end, Pinnacle adopts the following tenets to push the business strategy forward.

Current Positioning

Value is the key to long-term success in betting and Pinnacle provides the best opportunity for customers to find value in the betting market. Pinnacle offers better value than both bookmakers and betting exchanges. Pinnacle understands that value doesn't just apply to the odds a player bets with, but to all aspects of betting. That's why Pinnacle continuously reviews and develops its available payment options, betting menu, portfolio of casino games providers, and user experience to ensure customers get the most out of their money.

Market Analysis and Global Coverage

Pinnacle constantly seeks to identify and understand its target audience to consider its customer demographics, preferences, and behaviors. Focusing on key markets with personalization and localization to ensure an authentic and meaningful user experience is key.

While Pinnacle desires to participate in a piece of every bet in the world, pinnacle.com does not service a number of jurisdictions due to local laws and regulations. Pinnacle routinely updates its list of excluded markets and advises its audience of those excluded markets via its website terms and conditions. Through active and ongoing monitoring of legal and regulatory developments, political and environmental occurrences, and commercial realities, Pinnacle does not service customers in several jurisdictions – among them (and without limitation), the United States of America, the United Kingdom, France, and Spain – and deploys technical controls and IP address blocking to prevent sign-ups and website access.

Product and Service Expansion

Pinnacle recognizes the need for diversity of product offerings and constantly explores new betting options, casino games content, and additional features to attract a broader audience. This is achieved through Pinnacle's dedicated sportsbook and casino teams. Ragnarok services its customers via the pinnacle.com website, available on PC/desktop browser and mobile browsers (accessible on smart phones and/or tablets).

Marketing and Promotion

Pinnacle uses its local country managers to implement various robust digital marketing strategies, including SEO, social media, and online advertising, to increase brand visibility. Pinnacle also uses the tried and tested affiliate programs to work with affiliate marketing companies, social media influencers, and social media outlets for direct-to-consumer content distribution.

Regulatory Compliance and Responsible Gaming

Ragnarok is extremely excited to apply for a gambling license with the CGCB as it recognizes the need for continuous adherence to Curacao licensing regulations and to stay informed about any updates or changes. Ragnarok understands the need for consistent evolution and augmentation of its existing robust self-exclusion program and responsible gambling education efforts to prioritize player well-being. Educating customers about how to gamble responsibly is at the heart of Pinnacle's betting education content, podcast appearances, and marketing messaging. Responsible gaming and player safety is built into the wider Pinnacle Group strategy and planning.

Technology and Security

Although Pinnacle has, at its heart, a clear understanding of betting, it also understands the need to invest in the latest technologies and automated solutions and to continuously upgrade technology for optimal performance and user experience.

The industry has seen a rise in cyberattacks in recent years, so Pinnacle is constantly looking to strengthen cybersecurity measures to protect customer data and maintain trust and credibility with its long-standing audience and new customers.

Budget Allocation

Pinnacle's Finance team has put in place measures to allocate budgets strategically across marketing, technology, customer support, and compliance to maximize efficiency.

Customer Support and Community Engagement

Excellent customer service is at the heart of a sustainable digital betting and gaming business. Pinnacle adopts a *continuous improvement* culture where it is constantly reviewing ways to enhance customer support services to address queries promptly and thoroughly while providing a positive customer experience. Through personal touch and customer service representatives available via the pinnacle.com website 24/7, Pinnacle is able to service its customers and resolve queries personally, promptly, and professionally.

Pinnacle has a loyal base of customers which has been established through a strong online community through podcasts, forums, social media, and events to foster customer engagement.

Key Suppliers for KYC, Games and Esports Content, PSPs

Games Providers

Games content providers or suppliers are crucial to the success of Pinnacle for several reasons:

- **Diverse Game Portfolio:** A diverse game portfolio attracts a broader audience and keeps players engaged by offering different gaming experiences for pinnacle.com's online casino and esports betting services.
- **Player Retention:** Regularly updating and adding new games is essential for retaining players, and localizing and personalizing content to ensure customers' interests are being served.
- **Quality and Innovation:** High-quality graphics, sound effects, and gameplay are essential for a positive gaming experience. Leading content providers invest in cutting-edge technology and innovation to deliver games that meet or exceed industry standards. This contributes significantly to the overall reputation and success of Pinnacle.com.
- **Brand Reputation:** Players often choose online gambling sites based on the reputation of the games they offer. If a site partners with well-known and respected content providers, it enhances the site's credibility and trustworthiness. A positive brand image can attract more customers and contribute to long-term success.
- **Regulatory Compliance:** Games providers are responsible for ensuring that their games comply with regulatory standards and licensing requirements. Online gambling sites must adhere to strict regulations and provide a safe, secure, and fair means for customers to engage. Partnering with reputable content providers helps in meeting compliance standards as well as customer expectations.
- **Innovative Features and Technologies:** Games providers often introduce new features, mechanics, and technologies to the games, keeping the online gambling site at the forefront of industry trends. This innovation helps the site stand out from competitors and provides players with an exciting and up-to-date gaming experience.

- **Adaptation to Market Trends:** The gambling industry is dynamic, with trends and player preferences evolving over time. Successful content providers stay attuned to these changes and adapt their offerings accordingly. Online gambling sites that collaborate with such providers can quickly respond to market trends, ensuring they remain competitive.
- **Technical Support and Content Integration:** Content providers offer technical support to ensure seamless integration of their games into the online gambling platform. This support is crucial for the smooth functioning of the site, preventing technical issues that could lead to player dissatisfaction.

Games and content providers are core to the success of Pinnacle because they contribute to the attractiveness of Pinnacle.com, player retention, brand reputation, regulatory compliance, and ability to adapt to market trends. The collaboration between online gambling sites and content providers is a symbiotic relationship that significantly influences the overall gaming experience and success of the platform.

Pinnacle.com boasts a number of casino games from the following games providers:

Spride	Ezugi	iForium	Pragmatic Slots
Pragmatic Live	Netent	Evolution/EG Overseas	Play'n Go
Games Global	Relax	Hacksaw	GGames
1x2gaming	Playson	Endorphina	Genii
Habanero	Red Rake Gaming	Spinomenal	Retro Graming

Esports Data and Content

Pinnacle.com utilizes the following event data and content providers to deliver its esports betting experience:

GRID	Bayes	Abios	GameScoreKeeper
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KYC and Identity Verification Suppliers

Pinnacle.com partners with Sum + Substance ("SumSub") for ongoing know-your-customer identity and verification services. Integrated to Pinnacle's in-house technology stack and available on pinnacle.com via i-frame upon registration and during the lifetime of the user account, SumSub delivers services critical for the ongoing obligations of Pinnacle under AML laws and regulations, including customer information collection, document upload for proof of identity and/or address, identity verification checks, sanctions and watch-list screening, adverse media screening, and ongoing monitoring.

Payment Service Providers

Ragnarok depends on a number of payment service providers for the operation of pinnacle.com. Payment service providers are critical to the gaming operation to ensure customers can enjoy freedom of choice, ease, and convenience when depositing and withdrawing from pinnacle.com. Pinnacle considers these relationships to be material, and pinnacle.com supports over 30 payment partners globally with over 90% of all payment volumes in the last twelve months from the following partners:

BVNK	Cryptopay	Directa24
PayPer	Astropay	Paysafe Group
Ecopayz	EmerchantPay	Pay4Fun
Paramount	MuchBetter	CashtoCode
Payzen	Neosurf	Nuvei

These relationships are material; and because Pinnacle recognizes the importance of multiple payment solutions for the breadth of its competitive product offering and customer satisfaction, the organization maintains an in-house proprietary payment orchestration platform to seamlessly onboard, integrate, and deploy new payment solutions via pinnacle.com. The in-house proprietary payment orchestration platform ensures risk mitigation in the event of unexpected interruption or loss of service; and having multiple payment services providers available for each market in which pinnacle.com offers its services ensures ongoing coverage and support.

Risk Evaluation & Management; Legal & Governance Framework

Risk Management Framework

The operational business functions (first line of defense) are responsible for embedding and maintaining internal controls, policies, and procedures to mitigate business risks and meet regulatory obligations. The Legal, Risk and Compliance function (second line of defense) are accountable for ensuring the business meets its regulatory obligations, and the internal control environment is properly designed, implemented, and operating as intended.

The following key roles in the business have overall responsibility for ensuring effective risk management activities:

- ***Board***

It is the responsibility of Pinnacle's Board to oversee the organization's risk management framework and compliance program with all relevant regulations as carried out by the Legal, Risk, and Compliance team. The Board ensures that Pinnacle has effective controls and policies in place to meet licensing obligations and regulatory requirements in each jurisdiction where the wider Pinnacle Group holds gambling licenses. The Chairman of the Board holds regular strategic and operational meetings together with the Executive Management team whilst catering to shareholder sentiment and value creation.

- ***Risk and Compliance Committee***

The Board has promulgated a Risk and Compliance Committee, comprised of members of the Executive Management team, senior management, and subject-matter experts, who meet regularly to assess the effectiveness of the organization's risk management framework and compliance program, review outcomes of regulatory audits and agree remediation plans, discuss Business Risk Assessments and recommendations, hear and decide (when appropriate) compliance-related escalations, and steer the organization's efforts in line with business risk appetite, legal and regulatory developments, and market trends.

- ***Group General Counsel***

The Group General Counsel, reporting directly to the Chairman of the Board and Interim Chief Executive Officer, oversees the Legal, Risk & Financial Crime, Compliance and Regulatory Affairs department, ensuring that legal and regulatory obligations are met and advising the Board on all legal and regulatory measures impacting Pinnacle's business and operations.

- **Regulatory Affairs**

The Regulatory Affairs function plays a pivotal role in mitigating the regulatory risks of operating in a cross-border licensing regime by interpreting and navigating the regulatory landscape for online gambling in the various markets in which Pinnacle services customers. The Regulatory Affairs function collaborates closely with other departments to identify, assess, and manage potential risks. This involves staying ahead of the ever-evolving gambling laws, licensing requirements, and regulatory frameworks in various markets to ensure the Pinnacle's operations remain within legal boundaries. Additionally, the Group General Counsel and Regulatory Affairs function often interfaces with regulatory authorities, ensuring transparency and adherence to ongoing collaboration and reporting requirements.

- **Legal**

The Legal function is responsible for upholding corporate governance, drafting and reviewing contracts, managing website terms of service, advising on the resolution of player disputes when escalated, and other activities necessary to safeguard the Pinnacle Group's interests while upholding the rights of customers. By actively participating in the risk management process, the Legal function contributes significantly to the Pinnacle Group's overall compliance, protecting it from legal issues and fostering a secure and sustainable online gambling environment.

○ Compliance

The Compliance function consists of both regulatory and operational compliance professionals.

Operational compliance professionals comprise the Fraud Investigation and Prevention team and the Responsible Gambling team. These teams are each responsible for the ongoing monitoring and risk assessment of Pinnacle customers, behaviors, and activities undertaken on the website to prevent and minimize gambling related harms and losses.

Regulatory compliance professionals comprise the Regulatory Compliance team and are responsible for the oversight of all regulated market activity and ensuring that the business has an effective system of controls in place to meet its regulatory and licensing obligations. The Regulatory Compliance team partners with the operational business functions to render internal advisory services and compliance-oriented solutioning to carry out business undertakings in accordance with applicable regulation.

○ Risk & Financial Crime

The Risk and Financial Crime function, consists of the MLRO and Deputy MLRO, AML, Financial Crime Risk, and Customer Due Diligence teams.

The AML team functions as the first-line operational team regarding AML & CTF compliance, including Watchlist Screening and Enhanced Due Diligence (EDD) competencies, as well as identification, mitigation, and internal/external reporting of Money Laundering (“ML”) & Terrorist Financing (“TF”) risks.

The Financial Crime Risk team functions as a Quality Assurance (“QA”) control and ongoing monitoring function regarding the work of the AML and CDD teams. The Financial Crime Risk team is led by the Deputy MLRO with main duties mirroring the MLRO.

The Customer Due Diligence team functions as the first-line operational team overseeing know-your-customer procedures and practices, verifying customer documents, and maintaining electronic verification systems. Further, the Customer Due Diligence team acts as an escalator for the AML team when identifying relevant ML & TF risks during normal-course document reviews.

The MLRO and Deputy MLRO Role of the MLRO and their Deputy are responsible for, among other things, the following:

- Receiving internal Suspicious Activity Reports (“ISARs”);
- Considering ISARs received and evaluating whether there is ML or TF involved;
- Reporting any suspicious activity via Suspicious Activity Reports (“SARs”) to the appropriate authorities;
- Managing the AML/CTF and Sanctions Compliance program, policies, procedures, and controls;
- ML & TF and Sanctions risk assessments;
- Employee training in preventing ML, TF and sanctions evasion; and
- Ensuring fulfillment of Pinnacle's obligations under relevant national and supranational legislation and regulation.

○ Employees

Pinnacle expects all employees to play a part in a culture of shared responsibility for ensuring ongoing compliance, and the timely identification and mitigation of business risks.

Compliance Framework

- *Regulatory Compliance*

The Regulatory Compliance team manages and continually develops both the Compliance Management and Continuous Controls and Ongoing Monitoring Frameworks for the business. The Regulatory Compliance team partners with all key business stakeholders and functions in order to support the continued management of regulatory obligations, advising on all key strategic projects and initiatives. Additionally, the team oversees the effective development, implementation and continued performance of the internal control environment which is delivered via a program of continuous controls monitoring.

- *AML & KYC*

The Head of Risk and MLRO is responsible for upholding the businesses obligations with regards AML, Financial Crime Risk, Customer Due Diligence, and Enhanced Due Diligence, supported by dedicated teams that respectively manage AML and Financial Crime Risks, know-your-customer due diligence and enhanced due diligence, and risk mitigation activities.

Under the AML/CTF and Sanctions Compliance program, Pinnacle maintains jurisdiction-specific Business Risk Assessments (“BRAs”) for the business. These documents are reviewed periodically by the Executive Management team and when material changes occur and are signed off by the Pinnacle Board.

- *Responsible Gambling*

The Responsible Gaming team are charged with implementation, management, and maintenance of Pinnacle’s Responsible Gaming program, which includes the ongoing monitoring of customer behavior and activity to identify potentially at-risk customers, and the completion of tailored and timely customer interactions. The Responsible Gaming program aims to ensure that player protection is at the heart of business operations, ensuring that Pinnacle delivers its products and services in a socially responsible manner.

- *Data Protection & Privacy*

The Pinnacle Group has incorporated privacy protection requirements into the processes of daily business activities. Pinnacle follows globally applicable privacy laws, including the GDPR, and ensures that relevant business processes comply with applicable GDPR requirements. Pinnacle ensures that privacy protection activities are effectively implemented and supervised through a top-down organizational governance structure.

The Pinnacle Group actively responds to privacy law changes, player expectations, and other stakeholder requirements. Pinnacle continuously monitors privacy protection requirements into business control requirements and implement these requirements in the existing business process system.

Internal Controls

- *Information Security & Technology Risk*

The Pinnacle Group has an established internal control framework addressing information security, technology risks, and business continuity as managed and maintained by the IT Compliance and Information Security function. Pinnacle employs a system of ongoing monitoring and testing to ensure the security and integrity of Pinnacle’s systems, data, and infrastructure.

- *Fraud Investigation and Prevention*

The Fraud Investigation and Prevention team are responsible for the identification, investigation, and management of fraud risks and the implementation of loss prevention and mitigation strategies. The team operate a system of ongoing monitoring to identify potentially fraudulent and suspicious customer behavior and works in partnership with the Payments function to manage and prevent payments-related fraud in conjunction with third party payment providers.

- ***Training and Awareness***

The Pinnacle Group provides all staff with a program of ongoing compliance training that includes mandatory modules for AML & TF, Responsible Gaming, Data Protection & Privacy, and IT Security. Additional specialized training is provided to teams that assume roles in the Compliance and Risk & Financial Crime teams. Similarly, teams which interact directly with potentially 'at risk' customers are also provided a suite of advanced training in responsible gaming. The Pinnacle Group is committed to maintaining a culture of shared responsibility towards the effective management of compliance and business risks.

- ***Incident Response and Remediation***

Pinnacle has established incident reporting procedures to ensure timely internal reporting, assessment, and remediation. All incident reports are recorded and periodically assessed retrospectively; reports assessing incident rates and themes are provided to the senior and Executive Management teams. Where identified, common themes and systematic issues are addressed directly with business stakeholders to strengthen existing processes and controls.

- ***Reporting and Communication***

The Regulatory Compliance and Risk & Financial Crime team is responsible for ensuring all regulatory reporting and notification requirements are fulfilled and business risks communicated with stakeholders; existing mechanisms are in place to ensure Pinnacle can meet these requirements, including, but not limited to:

- Automated report generation for daily, weekly, monthly reporting, and ring-fenced Business Intelligence resources to support compliance and risk functions with ad-hoc analysis as required.
- Internal reporting and escalation procedures to identify and mitigate risks, and identify where external regulatory reporting / notifications may be required.
- Ongoing horizon scanning and dissemination of regulatory information and guidance to business stakeholders.
- Established procedures for the reporting and remediation of compliance and risk issues, as highlighted through ongoing and continuous controls monitoring, in line with internal RACI frameworks.
- Reporting of risk and compliance issues during bi-weekly Executive Team meetings and as necessary
- Maintenance of jurisdiction-specific Business Risk Assessments for the business; reviewed periodically and when material changes occur and communicated to the Executive Management team and signed off by the Pinnacle Board.

- ***Monitoring and Audit***

The Pinnacle Group employs the services of reputable third-party audit companies to fulfill external and internal audit requirements across its licensed legal entities, inclusive of audits focused on Finance / Accounts, AML & TF, product / technical compliance, information security, data privacy and ongoing compliance with regulatory requirements as required. The Compliance team manage a program of ongoing continuous controls monitoring in line with the Ongoing Monitoring and Continuous Controls Framework internally.

Pinnacle conducts independent reviews of its AML/CTF and Sanctions Compliance program in order to assess its effectiveness. The primary purpose of the independent review is to determine the adequacy of Pinnacle's AML & CTF

policies, procedures, controls, and undertakings, including whether the business is operating in compliance with the requirements of various national laws and regulations and Pinnacle's own policies and procedures.

The review contains the following elements:

- Policies, procedures, and BRAs
- Internal systems and controls
- Recordkeeping and reporting requirements
- Training
- Making recommendations regarding policies, procedures, systems and controls
- Monitoring compliance with recommendations

The review is risk-based and tests Pinnacle's risk assessment for reasonableness and risk mitigation strategies in place. The review also focuses on testing the internal controls and transactional systems and procedures on a sample basis.

The MLRO and Group General Counsel review any reports produced and any deficiencies and weaknesses identified are tracked for a timely resolution.

- ***Continuous Improvement***

Continuous improvement is managed through a number of mechanisms, including but not limited to:

- Ongoing monitoring of the regulatory landscape and self-assessment
- Incident management and monitoring, ensuring the timely remediation of control weaknesses, and ongoing business risk assessment and mitigation.
- Gap analysis of regulatory requirements and guidelines against the internal control environment to identify areas that may require strengthening.
- Continuous controls monitoring to assess effectiveness of current process, controls and procedures, and ensure they are designed correctly and functioning as intended.
- Jurisdiction-specific BRAs are maintained and reviewed by the MLRO periodically and when material changes occur. BRAs are communicated to and signed off by the Pinnacle Board. Furthermore, annual MLRO reports are produced by the Head of Risk & MLRO to inform the Board and Executive Management comprehensively as to the state of AML & CTF compliance, as well as effectiveness of the AML/CTF & Sanctions Compliance program.

Policies and Procedures

Pinnacle maintains a portfolio of policies and procedures to govern its business practices to ensure strong corporate governance, adherence to law and regulation, protection of its proprietary assets and information, and operational excellence. Pinnacle's Board, Executive leadership, and senior management team are each responsible for ensuring the portfolio is comprehensive and policies and procedures are accurate, periodically reviewed, and approved at the appropriate level of management. The portfolio is primarily drafted by in-house subject matter experts and business stakeholders in partnership with the Legal and Compliance teams under the oversight of the Group General Counsel; and where necessary, policies and procedures are reviewed by external local and/or specialized legal counsel and/or third-party auditors.

A brief overview of the Pinnacle Group policy portfolio is as follows:

- **Internal and Corporate Governance:** The organization maintains a Pinnacle Group-wide corporate governance framework to facilitate effective and prudent management to deliver long-term results to the organization's strategy and business undertakings. The Pinnacle Group's internal and corporate governance efforts are crafted with the underlying themes of responsibility, transparency, fairness, and accountability

and ratified through Pinnacle's Authorization Matrix, Global Code of Business Conduct and Ethics, and Employee Handbook. These policies outline, among other things, Board oversight, allocation of decision-making to Executive Management and senior management, use of external counsel and other professional advisors, and signatory rights for legally binding matters.

- **Privacy Policies:** At the forefront of Pinnacle's most valuable assets is its customers and keeping their information safe is one of Pinnacle's top priorities. Pinnacle details its responsibilities for keeping customer personal data safe in its Pinnacle.com privacy policy to create transparency in how data is processed, protected, used, and shared and routinely updates its privacy policy and framework according to data privacy trends and best industry practice.
- **Security Compliance Policies:** Pinnacle maintains a sub-set of policies and procedures related to IT and security compliance to ensure asset protection, integrity, confidentiality, and availability. These policies cover change management, data management and retention, accessibility and usability, and information security to ensure the business as well as Pinnacle's customers remain protected.
- **Regulatory Compliance Policies:** The sub-set of policies and procedures for regulatory compliance cover a broad scope of obligations and duties with content unique to an online gaming operator and the regulations and standards applicable to it, including, without limitation: Responsible Gaming, Marketing, AML/CTF, KYC, Payments Processing, Complaints and Dispute Resolution, and Incident Reporting.

Target KPIs and Objectives

Like any business, Pinnacle measures its success with financial indicators such as revenue, EBITDA, costs and expenditures, and value created for shareholders. Pinnacle understands, however, that those factors are subject ultimately to its overall customer acquisition, retention, and satisfaction in the long-term: which is why Pinnacle constantly seeks feedback from its customers to ensure it is holding true to its mission of delivering better value than its competitors and market companions.

Through online customer surveys, direct customer outreach, and a personalized approach to customer service, Pinnacle quantifies its customer satisfaction in areas such as time to register and wager, breadth of product offering, website uptime and availability, response time for customer inquiries, payment options and variety, time to deposit and withdrawal, and user experience satisfaction into a series of reports and metrics used to strengthen and enhance the areas that customers perceive to be less than satisfactory. In turn, this continuous improvement and commitment to our customers' satisfaction drives forward the bottom line.

Conclusion

Ragnarok Corporation N.V. is positioned as a leader in the global cross-border gambling industry, offering a diverse range of products and services. We trust this business plan reflects our commitment to continuing our pinnacle.com business from Curacao and to compliance, responsible gaming, and sustainable growth. We eagerly await the CGCB's decision to continue our legacy as a trusted and innovative operator in the market.