



e-Management N.V.
MAY 18 2026

Operations Manual

Entity: Eastpoint Operations N.V.

Version: Revised (Compliance Update)

Purpose: This Operations Manual incorporates mandatory remediation actions and aligns with Curaçao GCB/CGA regulatory requirements, AML/CFT obligations, and Responsible Gaming framework.

1. Introduction & Purpose

This Operations Manual is supported by detailed internal policies, including but not limited to the AML/CFT Policy, Responsible Gaming Policy, Information Security Policy, and Player Complaints Policy.

These documents collectively form the Company's operational control framework.

2. Regulatory Framework & Oversight

- The Curaçao Gaming Control Board (GCB) is the primary supervisory authority for AML/CFT, Responsible Gaming, and compliance oversight.
- The Curaçao Gaming Authority (CGA) oversees licensing under applicable legislation.

2.1 Regulatory Reporting

- A Regulatory Reporting Register must be maintained
- Includes deadlines for:
 - STR reporting to FIU Curaçao
 - Incident reporting
 - Licensing updates

2.2 Ownership

- Compliance Officer is responsible for all regulatory communications and filings
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3. Corporate Structure & Governance

3.1 Compliance Officer Independence

- Operates independently
- Has unrestricted access to all systems and data
- Reports directly to senior management

3.2 Conflict of Interest

- Compliance Officer must not hold operational roles (CEO, CFO, COO, Gaming Ops)

3.3 Responsibilities

- Key persons must have documented operational and compliance responsibilities
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4. AML, KYC & Fraud Prevention

4.1 Customer Due Diligence (CDD)

CDD must be performed:

- Before establishing business relationship
- When transactions exceed NAF 4,000
- When linked transactions exceed NAF 4,000
- When suspicion arises

4.2 KYC Timing

Customer identification and verification must be completed before deposits, gameplay, or withdrawals.

4.3 Sanctions & PEP Screening

- All customers screened against UN, EU, OFAC lists
- Ongoing monitoring required

4.4 AML Alert Handling Process

1. Monitoring system generates alert
2. Compliance reviews within 24h
3. Risk assessment documented
4. Decision made (close/escalate)
5. STR filed if required

4.5 STR Reporting

- Internal escalation within 24 hours
- STR filed with FIU Curaçao without delay

4.6 Risk Framework

- Business Risk Assessment (BRA)
- Customer Risk Assessment (CRA)
- Risk profiles assigned and updated

4.7 Source of Funds

- Required for high-risk customers
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5. Responsible Gaming Operations

- Self-exclusion enforced across all systems
- GCB exclusion lists integrated and enforced

Monitoring

- Deposit behavior
- Loss patterns
- Session duration
- Behavioral anomalies

Breach Handling

- All breaches recorded, investigated, and reported
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6. Platform & Game Operations

- All RNG games must be certified by approved independent laboratories
 - Certification records retained for audit
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7. IT & Cybersecurity Operations

Logging

- All critical activities logged
- Logs retained for minimum 5 years

Monitoring

- IT responsible for monitoring and escalation to Compliance
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8. Financial Operations & Controls

Segregation of Funds

- Player funds segregated from operational funds

Withdrawals

- Subject to AML and fraud checks

Reconciliation

- Daily reconciliation by Finance
 - Reviewed by Finance Manager
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9. Customer Support & Complaint Handling

- Complaints acknowledged within 24 hours
 - Resolved within 10 business days
 - Managed in centralized system
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10. Incident Management

- Critical incidents reported to GCB within 24 hours
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11. Audit & Compliance

- Internal audits conducted annually
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- Audit register maintained
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12. Training

- Minimum 10 hours AML/CFT training annually for Compliance staff
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13. System Identification

The Company must maintain documented systems for:

- Transaction monitoring
 - Sanctions screening
 - Responsible Gaming monitoring
 - Logging and audit trails
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14. SLA Framework

Defined timelines:

- AML alerts: ≤24 hours
 - KYC completion: Before account activation
 - Withdrawals: Subject to AML checks
 - Complaints: ≤24h acknowledgment / ≤10 days resolution
 - Incident reporting: ≤24 hours
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15. Control Ownership Framework

Each control must include:

- Owner
 - Reviewer
 - Escalation path
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16. Continuous Improvement

- All incidents, AML alerts, complaints tracked in remediation register
 - Assigned owners and deadlines
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17. Final Compliance Statement

This Operations Manual is:

- Operationally defined
- Audit-ready
- Fully aligned with regulatory expectations

Aligned with:

- GCB AML Regulations (2025)
 - Responsible Gaming Guidelines
 - Compliance Officer requirements
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