

**mBet Solutions N.V. (Curaçao)**

**Restricted Countries**

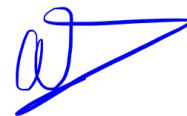
**POLICY AND PROCEDURES**

**V1**

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eMagnus Curacao B.V.

Managing Director

11/28/2025



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## POLICY APPROVAL

mBet Solutions N.V. (Curaçao) (the 'Company') is a company registered and incorporated in Curacao with Company registration: 129230.

The Company is committed to taking all appropriate measures to prevent its systems from being used for money laundering, terrorist financing, or other criminal activities, with a particular focus on high-risk and sanctioned territories.

These measures include:

- Active monitoring and IP blocking of all sanctioned countries and those listed on the FATF blacklist.
- Monitoring developments on the FATF greylist.
- Board-approved policies and practices.
- Maintaining and regularly updating a List of Restricted and Sanctioned territories.
- Applying a risk-based approach to all business relationships.
- Utilizing appropriate technology and tools to identify and mitigate risk.
- Ensuring all employees receive suitable training.

This policy ensures that the Company acknowledges and addresses the higher level of risks associated with global developments and events, including international sanctions and changes to FATF black and grey lists.

The Restricted Countries Policy has been reviewed and approved by the Management Board of the Company. All future updates will also be reviewed and approved by the Management Board prior to issuance. The latest version of this document supersedes all previous versions within the Company's operations.

All changes, additions, and approvals to this policy will be documented in the tracking table on page 2 for record keeping purposes.



## GENERAL PROVISIONS

The Company is licensed and regulated by the Government of Curaçao to offer interactive (online) remote betting and gambling products (games of chance) and services under a license issued by the Curacao Gaming Authority (CGA) with:

**Gaming License Number:** OGL/2023/110/0072

Under the terms of its operating licence the Company is required to have in place adequate policies, processes and procedures to prevent its systems being accessed from those countries being present on the restricted list, or from the sanctioned territories.

This document will be reviewed on a regular basis and on ad-hoc basis as required by changes to laws and regulations, changes to licence conditions, introduction or implementation of new products and services or in accordance with the Company's risk management practices and procedures, or based on the world developments and changes to international sanctions list and restricted territories. Reference to the applicable lists and locations might be found in List of Restricted and Sanctioned territories.

This document shall be reviewed upon significant changes in legislation but not later than on an annual basis.

## LAWS & REGULATIONS

The designated supervisory authority for service providers offering gaming services from the jurisdiction of Curaçao, or under a licence issued by a Curaçao service provider or master licensee, is the Curacao Gaming Authority (CGA).

The Company is required to comply with all applicable laws and regulations, including but not limited to:

- Sanctions National Ordinance (Curaçao)
- Kingdom Sanctions Act (Rijkssanctiewet)
- Landsverordening op de Kansspelen (LOK) – National Ordinance on Games of Chance

In addition, the Company actively monitors and implements compliance with international and high-risk jurisdictions' lists, including:

- FATF Grey List (Jurisdictions under increased monitoring)
- FATF Black List (High-risk jurisdictions)
- United Nations Security Council (UNSC) Sanctions List
- European Union (EU) Consolidated Sanctions List



## DEFINITION OF 'RESTRICTION'

For the purposes of this Policy, "Restrictions" shall refer to the prohibition or limitation of access to the Company's gaming services by individuals, entities, or jurisdictions, based on applicable legal, regulatory, or compliance requirements. This includes, but is not limited to: countries subject to international sanctions (UN, EU, or Kingdom of the Netherlands), territories prohibited by the Company's gaming license, and jurisdictions identified as high-risk under international anti-money laundering, counter-terrorism financing, or responsible gaming frameworks. Restrictions are implemented to ensure that the Company does not knowingly offer, promote, or allow its gaming services in prohibited markets, and to comply with all applicable laws, regulatory requirements, and international obligations.

## RESTRICTED COUNTRIES AND JURISDICTIONS

For the full list of restricted and sanctioned countries, please refer to the *Restricted Countries and Jurisdictions list*.

## COUNTRY RESTRICTING PROCESS

The Company's processes are regularly reviewed to ensure that all responsible teams have a clear and consistent understanding of regulatory expectations and requirements.

The Country Restricting Process integrates three main areas of engagement - Compliance, Operational, and Technical - where input from all relevant parties ensures a robust process that complies with applicable regulatory requirements and legislation.

### Compliance

The Compliance team actively monitors changes in applicable legislation and, together with Operational Team, maintains the up-to-date List of Restricted and Sanctioned Territories. Compliance also reviews the Restricted Countries Policy upon significant changes, but no less than on an annual basis.

Upon identifying a new relevant jurisdiction, a request for the implementation of blocking measures is being submitted to Company leadership and the Operations team.

### Operational

The Operations team, upon receiving a new request for country restriction, updates internal records and instructs the Technical team to implement the blocking measures. This step includes



removing the applicable country codes from the phone number prefix selection on the registration page. Manual testing is performed during the blocking process to ensure that the restrictions are functioning as intended, followed by the release of supporting communication.

## Technical

Following instructions from the Operations team, the Technical team manually adds the country code to the environment variable configuration. The Company services are then being redeployed to ensure the updated configuration takes effect.

As the final outcome of this process, any attempt to access the Company's website from a restricted jurisdiction will trigger a pop-up message informing the user that the Company's services are not available from their existing location.

## ONGOING MONITORING PROCESS

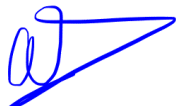
The Company's staff with its technical and operational teams, shall monitor the effectiveness of the implemented restriction measures over a 90-day period from the date of adoption of this policy. At the end of this period, technical solutions for all jurisdictions listed in the Restricted and Sanctioned Territories List shall be periodically retested. This process will verify that restrictions in place for the countries and jurisdictions listed in the Restricted and Sanctioned Territories List are functioning as intended, followed by issuance of a test report to the Compliance team.

Results of these checks shall be retained as evidence in the relevant shared storage. Evidence may include screen recordings or screenshots demonstrating that access to websites from restricted jurisdictions is blocked, confirming the continued effectiveness of the implemented measures.

Any failed test results shall be reported immediately to the Compliance Team for further escalation. Immediate corrective action shall be taken in accordance with the Country Restricting Process of this Policy to prevent access from any restricted jurisdiction identified during testing.

Document Name: v1 Restricted Countries Policy  
Authorized By: eMagnus Curacao B.V.  
Updated By: Compliance team of mBet Solutions N.V.  
Author: Compliance team of mBet Solutions N.V.  
Date: Nov 2025

**Signed:**



11/28/2025

eMagnus Curacao B.V.

Managing Director

