

Funds Management Procedure

The Company ensures the segregation of player funds through a structured model involving regulated Payment Service Providers (PSPs), rather than via traditional dedicated bank accounts. Each PSP maintains separate merchant accounts specifically for processing player deposits and withdrawals, to which the Company does not have direct access. These accounts are used exclusively for player-related transactions, ensuring that player funds remain isolated from the Company's operational funds.

More details about our approach in the field of Funds Management

1. Use of Payment Service Providers (PSPs)

The Company utilizes regulated Payment Service Providers (PSPs), including Inpay, MiFINITY, and Payneteasy, to handle all financial transactions between players and the platform.

Each PSP maintains merchant accounts that are opened specifically for player transactions. These accounts are not accessible to the Company in the traditional sense. A licensed PSP processes all player deposits, and the Company has no direct access to the player funds held there.

2. Limited Access and Controlled Settlement

The Company only receives settlements from the PSPs representing the net difference between total players deposit and withdrawal during the month, as additional the company calculates and recognizes profit only within the framework of the GGR (the net difference between total losses and winnings), and it will spend this amount freely, the rest of the money can only be used if the conditions are met aFund Security and Integrity Controls. This structure inherently ensures that the Company cannot use player funds, even inadvertently. Moreover, each PSP retains a rolling reserve ranging between 10% to 15% of the total transaction volume for up to 6 months. These reserve funds act as a buffer and are contractually committed by the PSPs to secure payouts to players and cover any operational risks.

3. Internal Reserve Fund

In addition to the structural limitations enforced by PSPs, the Company voluntarily maintains an internal liquidity reserve equivalent to 20% of the gross turnover. This reserve is held separately and is designated to ensure ongoing financial stability and the ability to cover player obligations at all times.

4. Fund Security and Integrity Controls

The Company does not access or utilize player balances for operational or commercial purposes. All player balances and transactions are tracked in real time through the Company's internal platform and CRM system, which provides continuous visibility and reconciliation of all player funds. Internal accounting systems continuously monitor liabilities to players. Weekly financial oversight ensures that reserves and PSP-reported balances are sufficient to cover all active player balances and pending withdrawal requests.

The financial team reports monthly on the liquidity position, including external reserves held by PSPs and internal capital buffers.

5. Audit and Verification

The Company's fund protection practices are subject to internal audit controls, and reconciliation processes are performed regularly. The Company is prepared to provide supporting documentation to evidence compliance with fund protection obligations under the LOK framework.

6. Conclusion

Although formal segregation via separate bank accounts is not implemented, the Company achieves functional segregation and high standards of fund protection through its use of regulated PSPs, contractually reserved funds, and internal liquidity buffers. This structure ensures that player funds remain protected, available, and verifiably separate from the Company's operational finances, in full alignment with the intent and spirit of the Curacao regulatory requirements.

A handwritten signature in black ink, consisting of stylized, cursive letters that appear to read 'R. H.' followed by a horizontal line and a small flourish.