

Progress Path Co N.V.

Operations Manual

(Version 1.0, May 19th, 2026)

1. Policy Overview and Statutory Compliance

This Operations Manual is maintained by **Progress Path Co N.V.** (the "Operator") in accordance with the requirements set forth in the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK).

2. Description of Games of Chance Offered

- **Games of Chance Offered:** The Operator offers a comprehensive suite of online gambling products, including: Baccarat, Blackjack, Crash, Daily drops, Fast Play, Hot, Jackpot games, Last Played, Live Baccarat, Live Blackjack, Live Casino, Live Poker, Live Roulette, Live Shows, Lottery, Roulette, Scratch Cards, Slots, Table Games, Video Poker and other games.
- **Payment Possibilities:** The Operator supports a variety of secure and compliant payment methods, including major credit/debit cards, leading e-wallets, bank transfers, and cryptocurrencies. All payment methods are subject to AML/KYC checks.
- **Bet Amounts & Payouts:** Minimum and maximum bet amounts, as well as maximum payout limits, are defined individually for each game and displayed clearly within the game interface before a player places a wager. Payout rates (RTP - Return to Player) are compliant with licensing standards.
- **Software and Outcome-Determining Elements:** All Games of Chance utilize a certified Random Number Generator (RNG) to ensure unbiased and unpredictable outcomes. The RNG is supplied by licensed, B2B-certified providers (such as Alea Overseas N.V., and Broomstone Associates Ltd) and is subject to independent third-party audits to confirm its statistical randomness and fairness.

3. Description of Periodically Used Test Methods for Quality Monitoring

The Operator ensures the integrity and fairness of its gaming offerings through strict quality monitoring, which includes:

- **Third-Party Certification and Vendor Compliance:** The Operator integrates gaming software exclusively from licensed B2B-certified providers. The Operator ensures that all integrated gaming software has been subject to rigorous compliance testing and certification by internationally recognized, independent testing laboratories (e.g., eCOGRA, iTech Labs, GLI). These third-party certifications verify the statistical randomness of outcomes and the accurate calculation of the theoretical Return to Player (RTP) percentages. The Operator regularly reviews and monitors the validity of these B2B supplier certificates as part of its ongoing quality and compliance monitoring..
- **Internal Quality Assurance (QA):** Prior to deployment, all new games, software updates, and platform changes undergo rigorous internal QA testing. This includes functional testing, load testing, security vulnerability scanning, and verification of payout mechanisms.

- **Live Environment Monitoring:** Real-time data feeds are monitored for statistical anomalies that could indicate a malfunction or manipulation. System alerts are configured to flag deviations outside acceptable tolerances for immediate investigation and corrective action.

4. Player Data Storage and Digital Records

4.1. Way of Storing Players' Personal Data

The Operator treats all player personal data (PD) with the highest level of security and in compliance with relevant data protection laws.

- **Data Security:** All sensitive personal data (e.g., identification documents, passwords, financial details) is encrypted both in transit (using TLS/SSL protocols) and at rest (using industry-standard encryption algorithms).
- **Access Control:** Access to PD is strictly limited to authorized personnel via role-based access control (RBAC) and the principle of least privilege. All access attempts are logged and regularly audited.
- **Storage Location:** Player data is stored securely within high-security data center infrastructure that is fully certified under the ISO/IEC 27001:2022 international standard for information security management systems. Data is segmented, with critical data stored separately from less sensitive information.
- **Retention:** Data retention periods are defined in accordance with legal and regulatory obligations, ensuring that data is only kept for as long as necessary.

4.2. Digital Records of Critical Information

In accordance with the applicable laws and regulations of Curaçao, specific digital records of critical player information, their gaming transactions, and financial transactions is kept available to the Curaçao Gaming Authority (CGA) at all times on a server of a Tier-IV certified data center registered in Curaçao.

The scope of such critical information includes the following data sets:

- **Player Identity Data:** Unique player identification code (pseudonymised), player account number, age, residence, and ID document type & number.
- **Financial Transactions (Daily Totals):** Daily totals of deposits and withdrawals.
- **Gaming Activity (Daily Totals):** Daily totals of wagers.
- **Game Outcomes (Daily Totals):** Daily totals of losses and winnings (distinguishing payouts, bonuses, and blocked winnings).
- **Balance Account Records:** Daily opening and closing balances, including withdrawable funds.

5. Description of Visual Elements

The Operator ensures that the gaming interface is designed for maximum transparency, regulatory compliance, and player protection. The following visual elements are mandatory across the platform:

5.1. Transparency and Legal Information (Footer Area) To ensure that players are fully informed of their rights and the Operator's obligations, the footer of every page on the platform contains direct, one-click links to the following documents:

- **Terms and Conditions (T&C):** The primary legal agreement governing the relationship with the player.
- **Privacy Policy:** Detailed information on data processing and player privacy rights.
- **AML & KYC Policy:** Information regarding identity verification and anti-money laundering procedures.
- **Bonus Terms and Conditions:** Specific rules governing promotions, wagering requirements, and expiration dates.
- **Responsible Gaming Policy:** Access to player protection information.

5.2. Mandatory Regulatory Disclosures The homepage footer consistently displays the following statutory information:

- **Corporate Identity:** The official corporate name (**Progress Path Co N.V.**) and the registered office address.
- **Licensing Status:** The official license number issued by the **Curaçao Gaming Authority (CGA)** and a formal statement of regulatory oversight.
- **Digital Seal:** The official, dynamic **CGA Digital Seal** (Validation Emblem) for real-time license verification.

5.3. Responsible Gaming (RG) Section The Operator maintains a dedicated and clearly identifiable "Responsible Gaming" section, accessible via a prominent link in the header and footer. This section includes:

- **Counseling & Support:** Direct contact details for international crisis helplines and gambling counseling services.
- **Operational Policy:** The full text of the Operator's formal "Policy for Safeguarding the Responsible Offering of Games of Chance."
- **Self-Protection Tools:** Visual interfaces for setting deposit limits, cooling-off periods, and permanent self-exclusion.

6. Technical Measures to Prevent Admission of Banned Persons

The Operator has technical and procedural measures in place to prevent Vulnerable Persons, including minors, from playing.

- **Age Verification:**
 - Self-attestation of being over 18 during registration.
 - Mandatory government-issued valid ID check (passport, national ID, or driver's license) prior to first withdrawal and on reaching specified thresholds.

- Immediate account closure if the player is identified as a minor.
- **Self-Exclusion/Cooling Off Implementation:**
 - **Self-Exclusion:** The player's account is closed, and they can no longer log in for the selected duration. In accordance with the Policy, the Operator offers long-term, irrevocable self-exclusion periods of 1 year, 3 years, 5 years, 10 years, or Lifetime. This restriction strictly covers all brands and domains operated under the Operator's license. Any wagers placed following a self-exclusion request prior to full implementation will be voided and refunded.
 - **Cooling Off:** The account remains active, but gambling features are programmatically disabled for the selected temporary duration. The system provides non-pre-checked options for 24 hours, 7 days, 1 month, or 3 months.
 - **Duplicate Accounts:** Robust technical measures are utilized to identify and prevent self-excluded individuals from creating new accounts, utilizing data matching (Name, DOB, Email) and advanced IP/device fingerprinting.
 - **Payment Methods:** Any payment method known directly by the Operator and previously used by a self-excluded player is systematically blocked within the system to prevent any circumvention of restrictions.
 - **Limits:** Players can control their activity by setting daily, weekly, or monthly deposit limits. Once a limit is reached, additional deposits are blocked until the period resets. Any request to increase limit severity takes effect immediately, while requests to decrease or remove limits are strictly subject to a 24-hour cooling-off waiting period.

7. Technical Infrastructure and Restoration

7.1. Infrastructure Architecture Overview The Operator utilizes a hybrid cloud-based infrastructure designed for high availability and strict regulatory compliance. The architecture is divided into two distinct functional zones:

- **Primary Production Environment:** Managed and maintained by the Operator. This environment hosts the Edge Layer (CDN & DDoS protection), the Application Layer (Gaming Engine), and the Primary Data Storage Layer.
- **Regulatory Mirroring & Backup Environment:** Provided by Flutter Networks N.V. under Master Agreement No. 05032026 (Service ID: FN-55-44). This critical layer is hosted at the H2B CW01 Facility (Kaya Seru di Mahuma, Willemstad, Curaçao), a Tier-IV Certified Datacenter.

7.2. Data Mirroring (Curaçao Data Vault) In strict compliance with Article 5.9(j) of the LOK, the Operator has implemented a real-time data mirroring protocol. All critical financial and gaming transactions from the Primary Production Environment are mirrored with near-zero latency to the dedicated Curaçao-based VPS (Public IP: 216.122.184.20). This ensures that a complete, audit-ready dataset remains available to the CGA within the jurisdiction at all times.

7.3. Restoration and Disaster Recovery Plan (DRP)

- **Data Backup Policy:** Full system backups are performed daily and managed within the Operator's primary infrastructure. These backups are encrypted and stored in a secure, off-site location independent of the live production environment.
- **Curaçao Data Vault (Mirroring):** Independent of the general backup policy, all critical transactional data is mirrored in real-time to the Tier-IV facility in Willemstad (Service ID: FN-55-44). This specific node serves as a dedicated Regulatory Data Vault, ensuring that an audit-ready copy of all gaming and financial activity is available to the CGA at all times, even if the primary site's local storage is compromised.

A comprehensive visual schema detailing the network architecture, operational layers, and data flows of the system is provided in **Appendix 1: Diagram of the technical infrastructure**. This diagram serves as the structural baseline for the environments and restoration pathways described in this manual.

8. Responsible Gaming Implementation

The Operator's approach to Responsible Gaming is detailed in the *Policy for safeguarding the responsible offering of Games of Chance* adopted by the Operator on 15/05/2025.

- **Proactive Steps:** The Operator takes proactive steps and processes to protect Vulnerable Persons, promote responsible gambling, and mitigate or prevent problem gambling behaviour.
- **Mandatory Elements:** The Policy includes the following mandatory elements: Age verification, Information accessibility, Player self-assessments, Behaviour tracking, Cooling-off Periods, Self-exclusion, Deposit limits, Consumer Advertising and Marketing, and Training of employees.
- **Intervention and Identification:**
 - The Operator utilizes holistic analysis, including automated behavior tracking and monitoring systems, to identify at-risk individuals based on indicators such as sudden changes in deposit patterns, playing frequency, or chasing losses.
 - **Intervention Protocol:** Players identified as at-risk will be informed of available tools. The escalation protocol includes direct communication, applying mandatory deposit limits, temporary account suspension, or permanent exclusion.
- **Self-Management Tools:**
 - **Cooling Off:** Temporary restriction (options for 24h, 7 days, 1 month, or 3 months) where wagering and deposits are strictly prohibited.
 - **Self-Exclusion:** Long-term, irrevocable exclusion (minimum 1 year, with options for 3, 5, 10 years or Lifetime) where the account is closed.
 - **Deposit Limits:** Players can set daily, weekly, or monthly limits. Any request to decrease a limit (make it stricter) takes effect immediately, while requests to increase or remove a limit are subject to a mandatory 24-hour cooling-off period.

- **Advertising:** Marketing must not target Vulnerable People, portray gambling as an investment, or use emotional manipulation. All advertising must include a visible responsible gaming message.

9. General Terms and Conditions (T&Cs)

- **Accessibility and Transparency:** The Operator ensures that the General Terms and Conditions (T&Cs) are clearly visible and easily accessible to all players. The T&Cs are positioned to be no more than one click away from the platform's homepage and are mandatory for review and acceptance during the account registration process.
- **Complaints Procedure Integration:** In accordance with regulatory requirements, the formal Complaints Procedure is explicitly outlined within the T&Cs as a standalone section. This section provides clear instructions on how to submit a grievance, the expected timelines for resolution, and the escalation paths.
- **Responsible Gaming Reference:** The T&Cs incorporate direct references and links to the Responsible Gaming Section (RG Section), ensuring that player protection measures are legally binding and transparent.
- **Version Control and Most Recent Text:** The Operator maintains strict version control over its T&Cs. The most recent and currently applicable text of the General Terms and Conditions is attached to this Operations Manual as **Appendix 2**.
- **Updates and Notifications:** Any material changes to the T&Cs will be notified to the players in advance, and their continued use of the services will be subject to the acceptance of the updated terms.

10. Dispute Settlement with Players

The Operator settles disputes with players in accordance with the formal ***Player Complaints Policy (adopted by the Operator 12/08/2025)*** and the ***Alternative Dispute Resolution (ADR) Policy (which forms an integral part of the General Terms and Conditions available on the Operator's platform)***, ensuring compliance with **Article 5.3 of the LOK** and the **CGA Player Complaints Policy Guidelines** (Version 1.1 adopted on 18/06/2025).

10.1. Complaint Submission

- **Eligibility:** Complaints must be submitted by the registered account holder.
- **Timeframe:** Players may lodge a complaint free of charge within **six months** of the incident or the settlement of the bet.
- **Method:** To be formally recognized, complaints must be submitted via the **official Complaint Submission Form** available on the website. The player must provide full identification, account details, and a comprehensive description of the grievance with supporting evidence.

10.2. Complaint Resolution Timelines

In line with the Player Complaints Policy, the following strict timelines apply:

Complaint Type	Initial Acknowledgment	Resolution Timeline	Maximum Extension
Responsible Gaming	Within two days	Within 5 business days	Up to 2 weeks (with notice)
General Complaints	Within one week	Within 4 weeks	One-time extension of 4 weeks

10.3. Final Response and Resolution

- **Written Determination:** Every player receives a reasoned final assessment in writing, including supporting evidence where applicable.
- **Rejection:** If a complaint is not handled, detailed reasons will be provided. If the player fails to provide requested information within the initial 4-week period, the Operator may reject the complaint.
- **Escalation:** If the player remains unsatisfied, they are formally informed of their right to escalate the matter to an independent ADR entity (ABC-ADR Limited, ID: CGA/ADR/2025/02).

10.4. Alternative Dispute Resolution (ADR)

If a dispute remains unresolved after the internal process, players have the right to seek independent mediation.

- **Appointed ADR Provider:** The Operator has appointed **ABC-ADR Limited** (ADR ID: CGA/ADR/2025/02) as its independent ADR entity.
- **Cost:** The ADR service is provided to the player **free of charge**.
- **Binding Nature:** In accordance with the ADR Policy, decisions rendered by ABC-ADR Limited are binding upon the Operator for disputes up to the regulatory threshold. For claims exceeding this threshold, the Operator reserves the right to pursue further legal recourse.
- **Finality:** Once an ADR process is concluded, it cannot be reopened or submitted to another ADR entity. The player retains the right to seek judicial recourse through the courts of Curaçao.

10.5. Reporting to the Curaçao Gaming Authority (CGA)

In compliance with LOK reporting obligations, the Operator will submit semi-annual reports to the CGA (by **January 15th and June 15th**). These reports will include:

- Total number of formal complaints received via the Submission Form;
- Categorization of complaints (RG, Technical, Financial, etc.);
- Status of complaints (Resolved, Unresolved, or Escalated to ADR);
- Summary of cases where legal action has been initiated.

11. Maintenance of Critical Records and Regulatory Data Vault

In strict compliance with Article 5.9(j) of the National Ordinance on Games of Chance (LOK), the Operator maintains a dedicated Regulatory Data Vault hosted on a Tier-IV certified server located in Curaçao (provided by Flutter Networks). This system ensures that all critical operational data is mirrored in real-time and remains available to the Curaçao Gaming Authority (CGA) at all times.

11.1. Scope of Recorded Data The following critical information is digitally recorded and mirrored to the Curaçao-based Data Vault:

- **Player Information:** Full registration details, identity verification (KYC) status, and account activity logs.
- **Gaming Transactions:** Comprehensive records of every bet placed, game outcomes, and session duration (Game History).
- **Financial Transactions:** Detailed logs of all deposits, withdrawals, pending payments, and balance adjustments, including timestamps and payment method identifiers.
- **Responsible Gaming Data:** Records of self-exclusions, cooling-off periods, and deposit limit modifications.

11.2. Data Mirroring and Availability

- **Real-Time Synchronization:** The Operator utilizes an automated mirroring protocol that replicates transactional data to the Data Vault with near-zero latency.
- **Tier-IV Reliability:** The infrastructure in Curaçao is Tier-IV certified, guaranteeing 99.99% availability and high-level physical and digital security.
- **Regulatory Access:** The CGA is provided with direct, read-only access to the mirrored server, allowing for independent auditing and oversight of the Operator's activities without interference with the primary production environment.

11.3. Data Integrity and Retention

- All mirrored records are encrypted at rest and in transit.
- Digital records are maintained for a minimum period of **five years** (or as otherwise mandated by Curaçao law), ensuring a complete historical audit trail for financial and gaming activity.

Progress Path Co N.V. has caused this **Operations Manual** to be duly executed on this **19th day of May, 2026**.

For and on behalf of Progress Path Co N.V.:

By: (SMES) Solutions for Management and Employment Support N.V.
Title: Managing Director

Represented by Managing Director



Vivian Victoria Ersilia