

SONNE N.V.

OPERATIONS MANUAL

Prepared in accordance with Article 5.9 of the National Ordinance on Games of Chance (LOK)

Document item	Details
Licensee	Sonne N.V.
CGA Licence Number	OGL/2024/1162/0455
Brand / player-facing website	sonne.bet
Company registration number	163610
Registered address	Abraham de Veerstraat 1, Willemstad, Curaçao
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Operations Manual Requirements Matrix

This matrix maps the minimum operational manual requirements under Article 5.9 LOK to the corresponding sections of this Manual. It is intended as a quick regulatory navigation tool and does not replace the substantive sections below.

LOK Article 5.9 requirement	Where addressed in this Manual
Description of games of chance offered, payment possibilities, bet amounts, payouts, software, and outcome-determining elements	Section 2
Description of periodically used test methods for quality monitoring	Section 3
Method of storing players' personal data and other details	Section 4
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Most recent text of the general terms and conditions	Section 9 and Annex 1
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Section 1 — Corporate Governance, Scope, Ownership, Key Persons, and Regulatory Compliance Framework

1.1 Purpose and scope

This Operations Manual applies to Sonne N.V. as the Curaçao licensee and to the single brand and player-facing website operated by the Company: sonne.bet. References in this Manual to the “Website”, “Brand” or “Platform” mean sonne.bet and the systems, suppliers, records, policies, controls, and internal functions used to support that brand.

This Manual is limited exclusively to Sonne N.V. and sonne.bet. It must not be interpreted as covering any other company, management services provider, brand, website, domain, player base, supplier arrangement, or policy framework.

1.2 Current operational status

As at the date of this Manual, sonne.bet is not being used for live operational activity. Sonne N.V. is not currently conducting live player-facing gaming operations through the Website, and no live deposits, wagers, payouts, or player account operations are being carried out through sonne.bet. The Website is treated as the Company’s designated brand/domain for potential future operations and for regulatory readiness purposes.

The Company is also evaluating whether it may pursue activities in the B2B sphere, including software, platform, aggregation, or related services. No B2B model will be implemented until the Company has completed a regulatory assessment of the Curaçao framework, including whether any licence, registration, supplier registration, portal submission, contract adjustment, or CGA notification/approval is required. This Manual must be updated before any material launch or change in operational model.

1.3 Corporate identity and licence

Item	Sonne N.V. position
Legal name	Sonne N.V.
Registration number	163610
Registered address	Abraham de Veerstraat 1, Willemstad, Curaçao
CGA licence number	OGL/2024/1162/0455
Brand/domain	sonne.bet
Applicable law	Curaçao law, including the National Ordinance on Games of Chance (LOK) and applicable CGA policies and licence conditions

1.4 Ownership and governance

Sonne N.V. maintains its ownership and governance records in accordance with Curaçao corporate law and CGA requirements. The Company’s current corporate documentation identifies Iconnect Product Ltd as

shareholder of Sonne N.V. and Morganite Corporate Services B.V. as the statutory managing director. The Company's group ownership structure identifies Dmytro Matiuk as ultimate beneficial owner through the relevant corporate chain.

Function	Current person/entity or responsibility
Ultimate Beneficial Owner / CEO / CTO	Dmytro Matiuk – strategic direction, technology oversight, platform readiness, continuity, and cyber/IT governance coordination
Chief Financial Officer	Olena Zhelevska – financial oversight, budgeting, payment controls, financial reporting coordination, and safeguarding of operational funds
Compliance Officer	Volodymyr Litvinov – AML/CTF, KYC, sanctions, responsible gaming, complaints, CGA reporting, policy maintenance, and regulatory change monitoring
Statutory Managing Director	Morganite Corporate Services B.V. – statutory management function in Curaçao according to the Company's corporate records

1.5 Regulatory compliance framework

The Compliance Officer maintains a regulatory obligations register covering LOK requirements, CGA policies and guidelines, licence conditions, CGA Portal obligations, AML/CTF and KYC requirements, responsible gaming, complaints/ADR, information security, critical data storage, supplier governance, crypto/virtual asset controls, and local substance developments.

This Manual must be read together with the following Sonne N.V. documents and records: Terms and Conditions for sonne.bet, AML/CTF Policy, KYC procedures, Responsible Gaming Policy, Player Complaints Policy and Complaint Submission Form, Privacy/Information Security documentation, Critical Supplier Register, incident register and CGA Portal submission records.

1.6 CGA Portal and regulatory communications

Formal regulatory submissions, licence management actions, domain management actions, complaint reporting, incident reporting, operational manual amendments, and material regulatory correspondence must be managed through the CGA Portal where required. Portal access must be role-based, least-privilege, and reviewed periodically. Portal activity is treated as regulatory activity and may affect the Company's licence, domain authorisation, seals, and supervisory record.

1.7 Change management

Before implementing any material operational change, the relevant business owner must prepare a short change assessment describing the proposed change, affected systems, player impact, regulatory implications, supplier impact, AML/CTF impact, responsible gaming impact, data/security impact, and whether CGA notification or approval is required. The Compliance Officer must review all regulatory changes before implementation. This includes any activation of sonne.bet for live operations and any move toward a B2B business model.

Section 2 – Games of Chance, Payment Possibilities, Bet Amounts, Payouts, Software, and Outcome-Determining Elements

2.1 Current status and launch readiness

Sonne N.V. is not currently conducting live player-facing gaming operations through sonne.bet. Accordingly, this section records the operational model and controls that must apply before sonne.bet is activated for live play. If the Website is launched, this section must be reviewed against the final platform configuration, approved supplier list, game catalogue, payment methods, accepted currencies, and public player terms before go-live.

2.2 Intended game categories

Subject to final supplier due diligence, technical certification checks, contractual controls, and regulatory readiness, sonne.bet may offer the following categories of remote games of chance:

- Sports betting and sportsbook products, where odds, bet capture, settlement and event data are supplied through approved and contractually controlled sportsbook/odds providers.
- RNG-based casino games, including slots, table games, instant games and similar products supplied by certified game providers.
- Live dealer casino games, where game outcomes are generated by physical game processes conducted in a live studio and transmitted digitally to the Platform.
- Virtual sports and other RNG-based simulated events, where outcomes are generated by certified software rather than real-world sporting results.
- Promotional or bonus-enabled play connected to the above products, subject to clear rules, AML/CTF controls, responsible gaming safeguards and transparent terms.

2.3 Outcome-determining elements

For RNG-based games, outcomes must be generated exclusively by certified random number generator software within the relevant game module or remote gaming server. The Company does not manually influence, alter, or determine game results. For live dealer products, outcomes are determined by physical randomisation processes such as card draws, roulette wheel spins or equivalent game procedures, with results captured and transmitted through the provider's certified systems. For sports betting, outcomes depend on the relevant event result and settlement rules as implemented through the approved sportsbook/data feed configuration.

2.4 Software and platform configuration

The Website may rely on one or more third-party platform, game, payment, KYC, hosting, analytics, marketing, or support suppliers. Before any supplier or module is used in production, the Company must verify the supplier's regulatory status, certification status where applicable, information security posture, data protection arrangements, operational resilience, incident notification obligations, and cooperation rights for regulatory supervision.

Where Sonne N.V. uses a B2B provider's certified remote gaming server, game content, sportsbook feed, or other critical technology, the Company's accountability is implemented through due diligence, contractual assurance, certification verification, ongoing monitoring, and prompt notification/escalation if a certification or service becomes invalid or unreliable. The Company does not assume direct operational control over systems that remain under a B2B provider's technical control.

2.5 Payment possibilities

No live payment processing is currently conducted through sonne.bet. Before launch, the Company must approve the final payment method list and ensure consistency between the Website, Terms and Conditions, AML/CTF Policy, payment provider contracts, restricted-country controls, crypto/virtual asset controls, and player communications.

Potential payment options may include card payments, bank transfers, regulated e-wallets, alternative payment methods, and virtual asset payment solutions where permitted and technically supported. The Company does not act as a bank, payment institution, exchange, VASP, wallet custodian, or financial intermediary for players. It must not offer fiat-to-crypto, crypto-to-crypto, exchange, trading, custody, or transfer services outside gambling-related deposits and withdrawals.

2.6 Bet amounts, payout rules and player disclosures

Before live operation, the Platform must display game-specific minimum and maximum bets, payout rules, RTP or equivalent information where applicable, bonus wagering conditions, settlement rules, and withdrawal limits in a clear and accessible manner. Winnings must be calculated automatically by the relevant platform/game module according to certified rules and credited to the player account without manual manipulation by operational staff.

Section 3 – Periodic Testing and Quality Monitoring

3.1 Testing responsibility

The CEO/CTO has primary responsibility for technical readiness and quality monitoring, supported by the Compliance Officer for regulatory, player protection, and incident-reporting implications. In the pre-operational phase, testing focuses on readiness assessment; once live, testing must become part of ongoing operational control.

3.2 Pre-launch testing

Before sonne.bet is activated for live player operations, the Company must complete and document a pre-launch testing programme covering:

- website availability, navigation, language/version control and regulatory disclosure display;
- registration, age declaration, restricted jurisdiction blocking, geolocation and KYC workflow;
- game loading, game information display, bet placement, result settlement and balance update flows;
- deposit, withdrawal, refund, payment rejection, chargeback and failed-transaction flows;
- responsible gaming tools, including deposit limits, cooling-off, self-exclusion and marketing suppression;
- complaint submission links, customer support routes, privacy links, and Terms and Conditions acceptance;
- admin/back-office access controls, logging, audit trail, permission review and segregation of duties;
- critical data replication, backup, restoration and regulatory data availability procedures.

3.3 Certification and supplier evidence

Game and platform modules that require independent certification must not be used for live operations unless the Company has obtained, reviewed, and archived evidence of certification or equivalent regulatory approval. Supplier certificates and service evidence must be linked to the supplier record in the Critical Supplier Register and rechecked at defined intervals, at least annually or more frequently where risk requires.

3.4 Ongoing testing after launch

After launch, the Company must perform periodic functional tests, regression tests following material releases, vulnerability scans, access reviews, monitoring of error rates and transaction exceptions, and periodic review of game performance metrics. Any material deviation, failure, vulnerability or unresolved supplier issue must be recorded in the incident register and escalated to the responsible owner.

Section 4 – Storage of Players' Personal Data and Other Details

4.1 Current data status

Because sonne.bet is not currently used for live player-facing operations, the Company does not presently maintain a live operational player database for active gambling activity through the Website. Any test data used for technical or compliance readiness must be segregated from live player data, clearly labelled as test data, and must not be treated as real player records.

4.2 Data categories upon activation

If live operations are activated, the Company will store only data necessary for lawful and controlled operation of sonne.bet, including registration data, account credentials, contact details, KYC/verification data, payment and transaction records, gameplay records, responsible gaming interactions, complaints, support communications, fraud/AML alerts, sanctions screening results, and regulatory reporting data.

4.3 Critical data storage

For live operations, the Company must maintain digital records of critical player information, gaming transactions and financial transactions in the manner required by Curaçao law and CGA requirements, including storage or replication to an approved Tier-IV certified data centre in Curaçao where required. The Company must keep a data dictionary describing the fields, sources, aggregation logic, retention periods, access permissions, and responsible owner for each critical data set.

4.4 Data protection controls

Player data must be encrypted in transit and at rest where technically possible and proportionate. Access to personal data and regulated records must be role-based, least-privilege, and logged. Access to KYC, AML, payment, responsible gaming and complaint data must be limited to personnel with a defined operational need. Data sharing with suppliers must be contractually controlled and limited to the purpose for which the supplier is engaged.

4.5 Retention and deletion

Data retention periods must align with Curaçao gaming, AML/CTF, tax, data protection, complaints, and record-keeping requirements. Data must not be deleted or altered where retention is legally required, a regulatory request is pending, or an investigation, complaint, AML case, or dispute is open. When retention expires and no hold applies, data must be securely deleted or anonymised in accordance with the Company's retention policy.

Section 5 – Visual Elements Shown to Players Through sonne.bet

5.1 Current visual status

sonne.bet is the only brand and Website covered by this Manual. As the Website is not presently used for live operational activity, any current public or pre-launch visual interface should be treated as non-operational unless and until the Company formally activates live player-facing services.

5.2 Required player-facing elements before activation

Before live operation, sonne.bet must display or provide one-click access to the following player-facing elements in a clear and readable manner:

- legal name of the licensee, registered address, registration number, CGA licence number, and the applicable CGA digital seal where required;
- current Terms and Conditions, Privacy Policy, AML/KYC or AML/CTF notice, Responsible Gaming Policy, Player Complaints Policy, and relevant complaint form/access instructions;
- registration flow requiring active acceptance of the Terms and Conditions and material policies;
- age restriction and responsible gaming messages, including 18+ or higher local-age restriction where applicable;
- game categories, game rules, bet limits, payout information, bonus terms and provider information where applicable;
- deposit and withdrawal information, accepted currencies and payment methods, fees/limits where applicable, and account verification conditions;
- account area showing player balance, transaction history, responsible gaming tools, verification status and communication/support routes.

5.3 Design governance

The visual design of sonne.bet must be consistent with the Company's approved brand and must not mislead players, target vulnerable persons, obscure material terms, or conceal regulatory disclosures. Marketing banners, bonus promotions, calls to action and player prompts must be reviewed against the Company's responsible gaming and advertising controls before publication.

Section 6 – Technical Measures to Prevent Admission of Banned Natural Persons

6.1 Scope

The Company must prevent participation by minors, self-excluded players, persons banned or excluded under applicable law or Company procedures, persons in restricted jurisdictions, sanctioned persons, and persons whose risk profile makes participation unacceptable under AML/CTF or responsible gaming controls.

6.2 Registration-stage controls

- age declaration and automated minimum-age validation;
- active Terms and Conditions acceptance and confirmation that the account is opened personally by the player;
- geolocation/IP screening and restricted-country blocking;
- document-based and/or electronic identity verification according to the KYC risk profile;
- sanctions, PEP and adverse-media screening through suitable tools or service providers;
- duplicate-account and device/payment-method matching to detect circumvention of bans, exclusions or account restrictions.

6.3 Ongoing controls

- periodic rescreening of customers against sanctions, PEP and exclusion indicators;
- session-level geolocation and VPN/proxy monitoring where available and risk-relevant;
- automatic enforcement of self-exclusion, cooling-off, deposit limits and other responsible gaming restrictions;
- suspension or review of accounts linked to fraud, multi-accounting, underage indicators, sanctions, AML concerns or attempted exclusion circumvention;
- case-by-case escalation to the Compliance Officer for manual assessment and documented outcome.

6.4 Evidence and audit trail

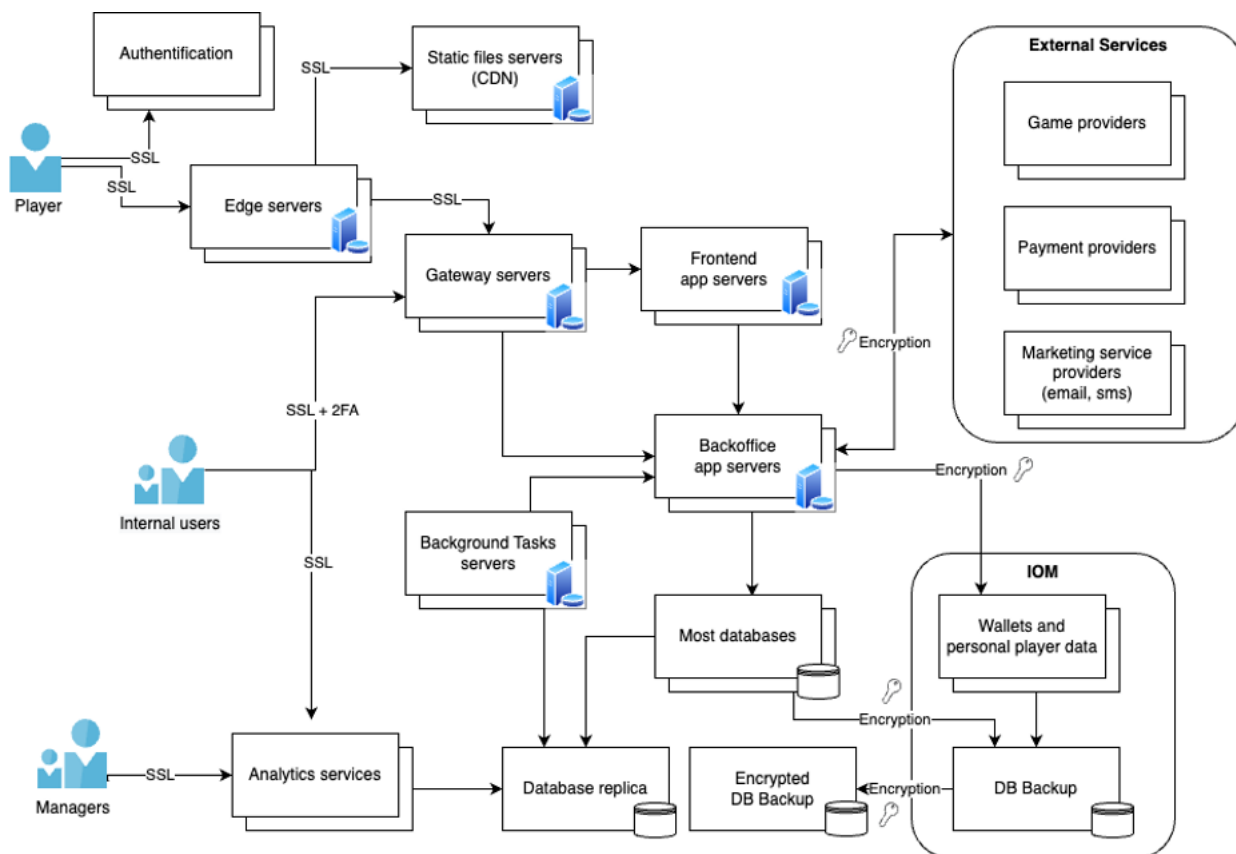
All restrictions, exclusions, screening hits, overrides, manual reviews, and account closures must be logged with the trigger, timestamp, responsible reviewer, decision, and supporting evidence. Confirmed breaches involving a banned or excluded person must be assessed as potential reportable incidents.

Section 7 – Technical Infrastructure and Restoration Possibilities

7.1 Current infrastructure position

As there are no live player-facing operations through sonne.bet at the date of this Manual, the technical infrastructure described below is the intended control architecture for operational readiness and must be validated against the final production environment before launch.

7.2 High-level infrastructure diagram



7.3 Restoration possibilities

- Database and application recovery: production databases and applications must be backed up according to recovery point and recovery time objectives approved by the CEO/CTO.
- Critical player data recovery: regulated critical data must be backed up or replicated in a manner that preserves integrity and availability for CGA supervision.
- Supplier outage response: contracts with material suppliers must define service levels, incident notification, business continuity cooperation, and exit/transition assistance.
- Incident logging: every restoration event must be recorded, including the cause, affected services, player impact, data impact, recovery steps, validation checks and closure approval.
- Pre-launch validation: before live use, the Company must test restoration from backup and document the outcome.

Section 8 – Implementation of Responsible Gaming Principles

8.1 Governance

The Compliance Officer is responsible for implementation and monitoring of the Responsible Gaming Policy for sonne.bet. Because there are no live player-facing operations at present, responsible gaming controls must be treated as launch prerequisites and must be tested before activation.

8.2 Core responsible gaming controls

- prevention of underage gambling through age declaration, KYC, document verification and account blocking where age cannot be verified;
- clear Responsible Gaming section on sonne.bet with direct access to tools and support information;

- player access to gambling history and transaction information in accordance with applicable requirements;
- deposit limits and, where implemented, loss/time/wager limits and reality-check functionality;
- cooling-off tools and self-exclusion tools that activate promptly and cannot be reversed during the applicable period;
- behavioural monitoring for signs of gambling harm, including sudden increases in activity, failed deposits, withdrawal reversals, extended sessions, bonus-related agitation, repeated changes to limits and duplicate-account attempts;
- operator-initiated interventions where risk indicators justify action, including communication, mandatory limits, temporary suspension or exclusion;
- marketing controls to avoid targeting vulnerable persons, minors or self-excluded players and to avoid portraying gambling as a solution to financial, emotional or social problems.

8.3 Training and review

Customer support, compliance, VIP/retention, marketing, and any outsourced personnel involved in player interaction must receive role-appropriate responsible gaming training before live operation and periodically thereafter. The Compliance Officer must review responsible gaming effectiveness at least annually and after any material incident, complaint trend, or regulatory change.

Section 9 – General Terms and Conditions

9.1 Applicable terms

The current Terms and Conditions for Sonne N.V. apply to the single brand and Website sonne.bet. The current version must be attached to this Manual as Annex 1 and kept consistent with the version published on sonne.bet before any live operation.

9.2 T&Cs governance

- Players must actively accept the Terms and Conditions during registration; passive acceptance alone is not sufficient for material terms.
- Material changes must be notified to players with reference to the changed clauses, effective date, and link to the updated text; re-acceptance must be obtained where required.
- Previous versions must be archived and made available to players upon request.
- The Terms and Conditions must disclose the licensee's legal name, registered address, registration number, CGA licence number, governing law, Curaçao court jurisdiction, player eligibility, KYC/AML obligations, responsible gaming, complaints/ADR, account closure, dormant accounts, payment rules, bonuses, game rules and limitations of liability.
- Any planned B2B model or supplier/software model must not be described to players as a player-facing service unless and until the business model is approved internally and, where required, notified to or approved by the CGA.

Section 10 – Player Complaints and Dispute Settlement

10.1 Current position

Although sonne.bet is not currently used for live player-facing operations, the Company maintains a Player Complaints Policy and complaint-handling framework for readiness and compliance purposes. Before launch, all complaint links, contact details and forms on sonne.bet must be checked for consistency with the published Terms and Conditions and Player Complaints Policy.

10.2 Complaint submission

Players must be able to submit complaints free of charge using the Company's complaint form or equivalent online process. The complaint route for sonne.bet is complaints@sonne-it.org unless changed in the published Player Complaints Policy and Terms and Conditions. The complaint form must request, at minimum, the complainant's name, address/place of residence, player account number where applicable, date of complaint, date of disputed event, category, description of the disputed conduct, preferred language, and supporting documents where relevant.

10.3 Timelines and handling

- Responsible gaming complaints must be prioritised; acknowledgement should be issued within two business days and best efforts made to resolve within five business days, with permitted extensions only where justified.
- Other complaints must be acknowledged within one week and resolved within four weeks, subject to one further four-week extension where necessary and communicated in writing.
- Responsible gaming complaints and complex complaints must be handled by human staff. AI tools, if used, may support administration only and must not replace human decision-making.
- All final outcomes must be communicated in writing with reasons and evidence where applicable.

10.4 ADR and regulatory escalation

If a complaint is not resolved to the player's satisfaction after the internal complaint process is completed, the player may escalate the matter to an independent CGA-certified ADR provider at the Company's cost.

The Company has concluded an ADR agreement with CADRE B.V., a CGA-approved, certified, and authorised ADR provider (certificate number CGA/ADR/2025/01, effective from 9 February 2026 to 9 February 2029), registered at 39 Scharlooweg, Willemstad, Curaçao (company registration number 165229). Players wishing to escalate a dispute to CADRE must do so via CADRE's official claim form, accessible at <https://cadre.online/file-a-claim-international/>, in accordance with CADRE's published rules of procedure (<https://cadre.online/rules-of-procedure/>), unless CADRE expressly instructs otherwise. General enquiries may be directed to CADRE at operators@cadre.online.

A minimum claim value of EUR 5,000 applies for a dispute to be eligible for ADR escalation, save that this minimum threshold does not apply to complaints concerning responsible gaming.

10.5 Record keeping and reporting

The Company must maintain a complaint register covering all complaints received, category, status, outcome, resolution date, unresolved matters, ADR escalations, legal proceedings, and any responsible gaming or AML implications. Complaint reports must be submitted to the CGA through the prescribed process when required.

Section 11 – Digital Records of Critical Player, Gaming, and Financial Information

11.1 Current status

Because there are no live player-facing operations through sonne.bet at the date of this Manual, no live weekly critical player data file is presently generated from production gambling activity. Before launch, the Company must confirm that the required critical-data recording and storage process is implemented, tested, and documented.

11.2 Critical records upon activation

When live operations begin, the Company must keep digital records of the following critical information for each player account, at least at the frequency required by Curaçao law and CGA requirements:

- a unique player identification code not directly traceable to the player by an unauthorised party but clearly linked internally to the player record;

- player account number, age, place of residence, identification document type and document number used for verification;
- daily total deposits and withdrawals per player;
- daily total bets or wagers per player;
- daily total losses and winnings, including winnings paid out, bonus/promotional winnings, and winnings blocked due to fraud suspicion or ongoing investigation;
- daily opening and closing balance with a separate indication of freely withdrawable funds.

11.3 Availability to the CGA

Critical records must be stored or replicated to the required Curaçao Tier-IV certified data centre environment where applicable, protected by end-to-end encryption, and kept available to the CGA in accordance with Article 5.9 LOK and related requirements. The Company must maintain evidence of the storage location, service provider, configuration, access arrangements, contractual rights, and backup arrangements.

Annexes

Annex	Document / record
Annex 1	Current Terms and Conditions for sonne.bet
Annex 2	Responsible Gaming Policy
Annex 3	Player Complaints Policy and Complaint Submission Form
Annex 4	AML/CTF Policy and KYC Procedures
Annex 5	Privacy Policy / Information Security Policy

Annexes should be attached, updated, or cross-referenced in the Company's internal compliance repository. Where an annex is updated, the Manual version history should be reviewed and amended if the change affects operational controls or regulatory submissions.

Signed This of June 30, 2026



Director: Morganite Corporate Services B.V.