

Subject: Formal Statement Concerning the Spanish DGOJ Communication (2022) and Compliance Measures Implemented by Bets Entertainments N.V.

Date: 10/10/2025

Dear Sirs,

We refer to the Curaçao Gaming Authority's recent request for clarification regarding the communication issued by the Dirección General de Ordenación del Juego (DGOJ) of Spain in 2022, as well as subsequent publications referencing Bets Entertainments N.V. ("the Company").

This correspondence serves as the Company's formal and comprehensive response, issued by its Ultimate Beneficial Owner, to confirm the factual background, legal context, and the full range of remedial and preventive measures that have been adopted to ensure ongoing compliance under the **National Ordinance on Games of Chance (LOK)** and the supervisory framework of the Curaçao Gaming Authority ("CGA").

1. Background and Context of the Spanish Communication (2022)

On 19 September 2022, the Spanish regulator (DGOJ), through its Subdirección General de Inspección del Juego, transmitted to the Company an email titled "*Nota Informativa acerca del juego ilegal en España*" ("Informational Note Regarding Illegal Gambling in Spain").

The content of that correspondence was of a general informational nature and expressly referred to the provisions of Law 13/2011 of 27 May on the Regulation of Gambling, outlining the potential penalties that could apply to any operator offering games of chance in Spain without holding a local licence. The DGOJ requested that any such operators cease the provision of services accessible from Spain and prevent access to Spanish IP addresses.

The Company duly acknowledges the receipt of this informational message but stresses the following:

- The communication did not constitute a formal notification of administrative charges or sanction proceedings against the Company;
- The correspondence did not include any procedural reference number, formal initiation order, or right of defence as required under Spanish administrative procedure to constitute valid notification of a sanction;
- Following that informational message, no subsequent correspondence, order, or enforcement request was ever received from the DGOJ or any other Spanish authority; and
- The decision later published in the *Boletín Oficial del Estado (BOE)* in 2023 appears to have been rendered unilaterally and without direct participation, notice, or service to the Company.

The Company was, therefore, not afforded the opportunity to respond, appeal, or otherwise exercise any procedural rights under Spanish law, and consequently, the measure remains a domestic administrative act without extraterritorial effect.

2. Legal Assessment and Jurisdictional Considerations

The Company has obtained legal advice confirming the following:

- *Absence of Procedural Service:* Under Spanish law, particularly in administrative sanctioning proceedings, formal service must occur through designated means (either to a Spanish address or through an appointed representative). As the Company has never had a Spanish

establishment or registered representative, the September 2022 email cannot be considered valid notification of sanction proceedings.

- *Jurisdictional Context and Enforcement Considerations:* The Company understands that the decision subsequently published in Spain constitutes an internal administrative resolution issued under Spanish domestic law. While we fully respect the sovereign authority of the DGOJ within its jurisdiction, such resolutions do not automatically extend beyond Spanish territory or acquire enforceability abroad without formal recognition through judicial channels. To date, as far as the Company is aware no judicial or governmental authority in Curaçao has been approached by Spain seeking recognition, cooperation, or enforcement of the measure, and no corresponding procedure has ever been initiated.
- *Elapsed Time Without Action:* Importantly, more than three years have now elapsed since the original 2022 communication, during which no enforcement action, correspondence, or cooperation request has been received from Spanish authorities. Had the matter been intended for execution or escalation, such steps would reasonably have been taken within that period.

In light of this, the Company respectfully submits that the Spanish decision remains a historic, non-operative administrative record, with no current legal or regulatory consequence for Bets Entertainments N.V.

3. Measures Implemented to Ensure Territorial Compliance and Risk Mitigation

Notwithstanding the non-enforceable nature of the Spanish resolution, the Company, in line with its commitment to best practices and in full respect of Curaçao's regulatory standards, has taken proactive and comprehensive steps to prevent any future territorial exposure or regulatory concern. These measures are detailed below.

3.1 Technical and Operational Measures

- All access originating from Spanish IP addresses has been technically restricted across all operational platforms under the Company's control.
- The player registration system has been updated to prevent the creation of new accounts where Spain is identified as the country of residence, or where identification documents are issued by Spanish authorities.
- Access to existing accounts previously associated with Spanish IPs has been restricted, and the associated deposits have been addressed in accordance with applicable responsible gaming and KYC procedures.

3.2 Marketing and Affiliate Restrictions

- The Company confirms that it has never directly targeted, marketed to, or directed traffic toward Spain or Spanish residents.
- To reaffirm and document this compliance posture, a confirmatory audit was conducted across all marketing and affiliate operations. The purpose of this review was solely to verify that existing parameters and configurations continue to exclude Spain entirely from the Company's marketing scope.
- All affiliates have been reminded in writing of the Company's long-standing policy of territorial exclusion with respect to Spain and instructed to maintain this restriction as a continuing compliance condition. The audit confirmed full adherence to this policy, and the Company will continue to monitor compliance on an ongoing basis.

3.3 Monitoring and Verification Controls

- The Company's Compliance and Technical Departments have established a recurring internal audit process to verify that Spanish access remains blocked.
- IP sampling, system logs, and internal penetration tests are now performed quarterly to verify that the restriction remains effective and cannot be circumvented.

3.4 Governance and Documentation

- A dedicated compliance file has been created documenting the measures implemented and the evidence of technical restrictions.
- All future regulatory correspondence will be immediately escalated to the Legal and Compliance Departments and recorded in the regulatory communications register.

4. Assurance of Integrity and Compliance under Curaçao Law

The Company reaffirms that the above actions have been implemented voluntarily and pre-emptively to ensure continued compliance with Article 5.9 of the LOK and with all obligations applicable to licensed gaming operators under Curaçao law.

The Company's governance and compliance framework has been significantly strengthened since 2023, including:

- The establishment of a dedicated Legal & Compliance Department;
- The introduction of structured internal reporting lines to management;
- The implementation of policies covering territorial compliance, marketing jurisdiction control, and provider oversight; and
- The active supervision of all brand operations by qualified professionals and key persons.

We respectfully submit that these actions collectively demonstrate the Company's integrity, transparency, and full alignment with the CGA's objectives of maintaining a compliant and reputable gaming sector.

5. Ongoing Commitment to the Curaçao Gaming Authority

We reiterate our full commitment to maintaining an open and cooperative relationship with the CGA and to ensuring the highest degree of compliance and transparency.

To that end, we confirm that the Company:

- Is prepared to provide technical proof and screenshots evidencing the Spanish IP and registration block;
- Will include Spain in its quarterly jurisdictional compliance reviews to confirm the continued effectiveness of these restrictions;
- Will immediately report to the CGA any material contact, inquiry, or enforcement attempt by any foreign regulator, including Spain; and
- Will continue to align its procedures with evolving CGA guidance and LOK implementation directives.

6. Statement of Assurance

The Company respectfully confirms to the Curaçao Gaming Authority that:

- The 2022 communication from the Spanish DGOJ was informational, not procedural, and did not result in any enforceable sanction served on the Company;
- The Company has ceased all accessibility and exposure to Spain and has implemented strict, verifiable measures to that effect;
- There is no ongoing risk or liability related to Spain; and
- The Company remains fully fit and proper to continue operating under its Curaçao licence.

We trust that the foregoing provides the Authority with full assurance that the matter has been comprehensively reviewed and addressed, and that all regulatory expectations have been met in good faith and with diligence.

Kind regards,



Christos Economides
Ultimate Beneficial Owner
Bets Entertainment N.V.