

MARKET ACCESS RESTRICTION POLICY

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Version: 1.0.

1. Purpose

The purpose of this Policy is to ensure that CSGO Empire gaming and skin trading services are accessible only in jurisdictions where such activities are lawful and compliant with the applicable international obligations.

This Policy establishes jurisdictional access controls, distinguishes between gambling and non-gambling (skin trading) functionalities.

2. Scope

This Policy applies to:

- All websites, applications, and digital platforms operated under the CSGOEmpire brand;
- All end users attempting to access, register, or interact with CSGOEmpire's services;
- All departments responsible for onboarding, IT operations, compliance, risk management, and marketing.

3. Definitions

- **Restricted Jurisdictions** – Countries or territories where online gambling is prohibited or where CSGOEmpire is not permitted to operate.
- **Permitted Jurisdictions** – Countries or territories where the Company may lawfully offer gambling or related services.
- **Skin Trading** – The exchange of virtual in-game items ("skins") or credits for non-monetary rewards, available in certain jurisdictions where gambling is restricted.
- **GEO-Blocking** – Technical prevention of access or gameplay from IP addresses or payment sources associated with restricted territories.

4. Principles of Market Access Control

4.1. Licensing and Jurisdictional Compliance

CSGOEmpire operates under a Curaçao license and may only provide games of chance (gambling) in jurisdictions that do not prohibit or restrict such activity.

Where gambling services are restricted by local law, the Company may enable access solely to non-gambling functionalities, including skin trading, marketplace interactions, and item management, provided these do not constitute gambling under applicable local laws.

4.2. Restricted Jurisdictions

The Company strictly prohibits gambling access, registration, deposits, or withdrawals from the following categories:

- Jurisdictions where online gambling is expressly illegal;
- Jurisdictions listed as sanctioned or high-risk under international AML/CFT standards;
- Jurisdictions excluded by the Curaçao Gaming Control Board or other competent authorities.

4.3. Skin Trading Access Exception

In Restricted Jurisdictions where gambling access is blocked, CSGOEmpire may, subject to local legal review:

- Permit users to access non-gambling functions such as item deposits, withdrawals, and trading;
- Ensure no wagering or random outcomes are available;

Users permitted only for skin trading are classified as “Trading Only” users, serving as the main distinction between trading and gaming users. Those marked as Trading Only are not able to participate in gambling games and are restricted to trading virtual assets only.

4.4. Technology Controls

- IP-based GEO-blocking prevent access to gambling functionalities from restricted territories.
- Users attempting to bypass access restrictions (e.g., VPNs, proxies) may have their accounts suspended.

5. Governance and Responsibilities

Department	Responsibilities
Compliance	Maintains the restricted and permitted jurisdiction lists; performs quarterly legal reviews; updates GEO-blocking database.
IT / Security	Implements and maintains GEO-blocking,

Department	Responsibilities
Support	Monitors potential circumvention, suspicious multi-accounting, and location spoofing, Player segmentation marking users as Trading Only.

8. Enforcement and Breach Reporting

Non-compliance with this Policy, including failure to block restricted access or unauthorized enabling of gambling in non-permitted jurisdictions, constitutes a breach of licensing obligations and internal compliance policy.

Such breaches must be reported immediately to the Compliance Manager.

9. Review and Updates

This Policy shall be reviewed at least quarterly or immediately upon:

- Updates from the Curaçao Gaming Control Board, FATF, or EU;
- Changes in international sanctions lists;
- Launch of new products, domains, or skins trading mechanisms.