

SOURCE OF FUNDS- AND SOURCE OF WEALTH DECLARATION

Of

Luigi Spina

I, hereby confirm that the funds provided to Ecorpp Management N.V. have not been derived from any criminal activities as defined in the Prevention of Money Laundering Acts of Curaçao

Furthermore, I confirm that my wealth is derived from the following sources:

Check source(s) of wealth	Necessary Information	Please describe the requested information or refer to attachments (mandatory)
☐ Family fortune	◆ Specify: e.g. (former) entrepreneurial, inheritance, other resources; if possible detailed and documented description	
☒ Active entrepreneurial	◆ Company name ◆ Short description of business activities ◆ Statutory seat ◆ Name company website (if applicable)	Digital Crypto Pay Sp. z o.o. (Poland). Founder, sole shareholder and President of the Management Board. Regulated Virtual Asset Service Provider providing cryptocurrency and digital payment services. Wealth accumulated through ownership, retained earnings, executive remuneration and business growth. Attachments: Certificate of Incorporation, KRS Extract, VASP Registration, Financial Statements and shareholder documentation.

☐ Former entrepreneurial	◆ If “sold to third party”: Name of purchaser and approximate date ◆ If other: Detailed and documented description	
☒ Income	◆ Profession ◆ Name employer	Profession: Entrepreneur / President of the Management Board. Employer: Digital Crypto Pay Sp. z o.o. Receives regular salary, executive remuneration and performance bonuses. Revolut statements evidence recurring transfers from the company. Declared annual remuneration approximately EUR 150,000, excluding shareholder value growth.
☒ Other	◆ Detailed and documented description	Sale of privately owned residential property at 49 Triq Pawlu Magri, Luqa, Malta. Gross sale price EUR 685,000. Mortgage redeemed and remaining proceeds transferred to beneficial owners. Supporting evidence: Deed of Sale, Special Power of Attorney, mortgage redemption documentation and banking records. Current wealth remains available through company ownership, accumulated savings, executive remuneration, retained business value and liquid bank balances.

	10/07/2026
Place and date	: _____
	
Signature	: _____
	Luigi Spina
Name	: _____

SOURCE OF WEALTH SUMMARY Luigi Spina

1. Purpose

This Source of Wealth Summary has been prepared to supplement the Source of Wealth Declaration previously submitted by Mr. Luigi Spina and to provide documentary evidence supporting the lawful accumulation of his personal wealth.

The purpose of this report is to demonstrate:

- the origin of Mr. Spina's wealth;
- the legitimacy of the businesses generating the income;
- ownership of the underlying assets;
- the audit trail supporting the accumulation of wealth;

This report specifically addresses the observations made by the Curaçao Gaming Authority that supporting documentation had not previously been provided to evidence the Source of Wealth declaration.

2. Professional Background

Mr. Luigi Spina is an entrepreneur with over 10 years of experience in the online gaming, fintech and virtual asset sectors.

Throughout his career, he has held senior management and director positions with several B2B gaming and technology companies, including Power Gaming Ltd, Evenbet Gaming Ltd, Join Games Malta Ltd and VR Mobile Slot. Since 2024, he has been the Founder and Director of Digital Crypto Pay, a registered Virtual Asset Service Provider in Poland.

His wealth has been accumulated progressively through entrepreneurial activities, executive remuneration, shareholder value and the development of Digital Crypto Pay, together with personal investment in residential real estate.

3. Active Entrepreneurial Activities

Mr. Spina is the founder, sole shareholder (100%) and President of the Management Board of:

Digital Crypto Pay Sp. z o.o.

The company is incorporated in Poland and registered with the Polish National Court Register (KRS). It is also registered as a Virtual Asset Service Provider (VASP) with the competent Polish authority.

The company provides regulated virtual asset and digital payment services, including cryptocurrency exchange, blockchain payment infrastructure and related fintech solutions.

Supporting documentation confirms:

- incorporation of the company;
- legal existence;
- Mr. Spina's ownership;
- appointment as President of the Management Board;
- VASP registration;
- ongoing commercial activities.

The company's financial statements further demonstrate continued operations and a significant increase in shareholder equity since incorporation. Corporate equity has increased substantially above the initial statutory capital, demonstrating legitimate business growth and value creation over time.

Supporting Attachments

Attachment 1 – Certificate of Incorporation

Attachment 2 – KRS Commercial Register Extract

Attachment 3 – VASP Registration Certificate

Attachment 4 – Financial Statements

Attachment 5 – Shareholder Documentation

4. Executive Remuneration and Business Income

In addition to his ownership interest, Mr. Spina receives executive remuneration from Digital Crypto Pay Sp. z o.o.

His income consists of:

- executive salary;
- management remuneration;
- performance bonuses;
- other legitimate distributions where applicable.

The attached banking records demonstrate regular incoming payments from Digital Crypto Pay directly into Mr. Spina's personal Revolut account.

The statements evidence multiple transfers during 2026, including recurring salary payments and executive bonuses. The transfers are clearly identifiable, originate from the operating company and demonstrate an ongoing income stream generated through legitimate commercial activities.

This documentation establishes a direct audit trail linking the operating company with Mr. Spina's personal wealth.

Supporting Attachments

Attachment 6 – Revolut Bank Statements

Attachment 7 – Salary and Bonus Payments

5. Property Investment

Mr. Spina owned residential property situated at:

49 Triq Pawlu Magri

Luqa

Malta

The property was sold during 2025 for a gross purchase price of approximately EUR 685,000.

The sale was completed before a Maltese Notary Public and was executed under a Special Power of Attorney due to Mr. Spina's professional commitments abroad.

Prior to distribution of the proceeds:

- the existing mortgage was fully redeemed;
- associated liabilities connected with the property were settled;
- the remaining proceeds became available to the beneficial owners.

Supporting banking documentation demonstrates the movement of funds following completion of the transaction and provides an independent audit trail for the capital realised from the sale.

Supporting Attachments

Attachment 8 – Final Deed of Sale

Attachment 9 – Special Power of Attorney

Attachment 10 – Mortgage Redemption Documentation

Attachment 11 – Banking Confirmation of Sale Proceeds

6. Current Wealth Position

Mr. Spina's current wealth primarily consists of:

- ownership of Digital Crypto Pay Sp. z o.o.;
- accumulated shareholder value;
- executive remuneration;
- retained business earnings;
- personal savings;
- proceeds derived from the sale of residential real estate;
- liquid funds maintained through personal banking accounts.

The available documentation demonstrates that these assets remain available and accessible.

There is no indication that the wealth originates from criminal activity, unexplained cash transactions, anonymous funding arrangements or high-risk jurisdictions.

7. Audit Trail

The attached documentation provides a continuous audit trail demonstrating the lawful accumulation of wealth.

The sequence is summarised as follows:

1. Establishment of Digital Crypto Pay Sp. z o.o.
2. Registration as a regulated Virtual Asset Service Provider.
3. Sole ownership by Mr. Luigi Spina.
4. Growth of shareholder equity and retained business value.
5. Executive remuneration and bonus payments.
6. Banking records evidencing receipt of income.
7. Sale of privately owned Maltese residential property.
8. Redemption of the outstanding mortgage.
9. Receipt of the remaining sale proceeds.
10. Current liquid assets available to support business operations.

Each stage is independently supported by corporate records, financial statements, banking documentation and notarial records.

8. Conclusion

Based on the documentation provided, Mr. Luigi Spina's wealth has been accumulated through identifiable, lawful and commercially verifiable activities conducted over a number of years.

The supporting evidence demonstrates:

- the origin of the wealth;
- the period over which the wealth was accumulated;
- ownership of the businesses generating the income;
- the scale and consistency of the wealth;
- documentary evidence linking business activities to funds received;
- continued availability of the assets.

Accordingly, this Source of Wealth Summary addresses the deficiencies previously identified by the Curaçao Gaming Authority concerning the absence of documentary evidence supporting Mr. Spina's Source of Wealth declaration by providing a complete narrative supported by independent corporate, banking and property documentation.

Index of Supporting Attachments

Ref.	Supporting Document
1	Translated Certificate of Incorporation – Digital Crypto Pay Sp. z o.o.
2	Polish KRS Commercial Register Extract
3	Translated Virtual Asset Service Provider Registration Certificate
4	Financial Position Digital Crypto Pay
5	Shareholder Register / Corporate Documentation
6	Revolut Bank Statements income from Digital Crypto Pay
7	Director's Service and Remuneration Agreement
8	Final Deed of Sale – Malta Property
9	Special Power of Attorney Sale of Property
10	Savings Account Luigi Spina