

Table of Contents

1-Introduction	7
1.1 About Mill Interactive B.V.....	7
1.2 Player Fund Segregation Commitment	8
1.3 Objective / Purpose	8
1.4 Scope of Policy.....	9
1.5 Application of Policy	9
1.6 Review Frequency of Player Fund Segregation Policy	10
1.5 Definitions	11
2. Segregation of Funds.....	13
2.1 Separate and Dedicated Accounts	13
2.2 Use of Reputable Financial Institutions	16
2.3 Monitoring and Reconciliation of Accounts	16
2.4 Reporting Requirements and Compliance with Licensing Regulations	17
3.5 Risk Management and Contingency Planning	18
3. Transfer of Fund	21
3.1 Secure and Reliable Transfer Methods.....	21
3.2 Documentation and Auditable Records	22
3.3 Timely Completion of Transfers	23
3.4 Additional Safeguards for Compliance.....	25
3.4.1 Dual Authorization for Fund Transfers	25
3.4.2 Daily and Monthly Reconciliation	25
3.5 Communicating Fund Transfer Policies to Players	26
3.5.1 Visibility on the Website.....	26
3.5.2 Clear Terms and Conditions.....	27
3.5.3 Inclusion in Player Agreements	27
3.5.4 Transparent Communication of Updates	27
3.5.5 Benefits of Transparent Communication.....	27
3.5.6 Ongoing Educational EDorts	28
4. Financial Controls.....	30
4.1 Reconciliation Processes of player funds.....	30
4.1.1 Daily Reconciliations	30
4.1.2 Monthly Reviews	30
4.1.3 Liabilities Alignment	30
4.2 Internal Controls	31
4.2.1 Restricted Access	31
4.2.2 Dual Authorization.....	31
4.2.3 Material Change Reporting.....	31

4.2.4 Benefits of Internal Controls	31
4.3 External Audits	32
5. Risk Management	35
5.1 Identified Risks to Player Funds	35
5.1.1 Cyberattacks	35
5.1.2 Operational Failures	35
5.1.3 Insolvency	35
5.1.4 Money Laundering (ML)	35
5.1.5 Terrorist Financing (TF)	35
5.2 Risk Mitigation Strategies	36
5.2.1 Cybersecurity Measures	36
5.2.2 Business Continuity Plan (BCP)	36
5.2.3 Insolvency Preparedness	36
5.2.4 AML/KYC Procedures	36
5.2.5 Terrorist Financing Controls	36
6. Regulatory compliance	39
6.1 Staying Updated on Regulatory Changes	39
6.2 Monitoring Regulatory Developments	39
6.3 Addressing Changes to Online Gambling Laws	39
6.4 Proactive Adjustment of Policies and Procedures	39
6.5 Mitigating Non-Compliance Risks	40
6.6 Meeting Licensing Requirements of the GCB	40
6.6.1 Separation of Player Funds from Operational Funds	40
6.6.2 Secure Accounts for Player Funds	40
6.6.3 Liquidity Management	40
6.6.4 Regular Financial Reporting	40
6.6.5 Reinforcing Trust and Compliance	41
6.7 Conducting Regular Reviews to Ensure Ongoing Compliance	41
6.7.1 Internal Audits and Reviews	41
6.7.2 Identifying Gaps and Areas for Improvement	41
6.7.3 Preparing for Future Compliance Challenges	41
6.8 Continuous Commitment to Compliance and Trust	42
6.8.1 Staying Updated on Regulatory Changes	42
6.8.2 Adhering to Licensing Requirements	42
6.8.3 Conducting Regular Policy Reviews	42
6.8.4 Strengthening Transparency and Accountability	42
6.8.5 Fostering Trust with Stakeholders	42
6.8.6 Ensuring Long-Term Success	43

7. Dispute Resolution	45
7.1 Clear and Accessible Complaint Process for Players:	45
7.1.1 Simple and Clear Channels for Reporting Complaints	45
7.1.2 Straightforward Process for Resolving Disputes	45
7.1.3 Ensuring Accessibility and Prompt Action	45
7.1.4 Improving Customer Experience and Building Trust	45
7.2 A Dedicated Team to Investigate and Resolve Disputes Promptly and Fairly	46
7.3. Transparent Communication with Players Throughout the Dispute Resolution Process	46
8. Transparency and Communication	49
8.1 Making the Policy Readily Available	49
8.2 Providing Clear Information about Fund Protection	49
8.3 Responding Promptly to Player Inquiries	49
9. Crypto-Specific Measures	52
9.1 Limited Exposure to Cryptocurrency Volatility	52
9.1.1 Stablecoin Usage (USDT)	52
9.1.2 Managing Volatile Assets (BTC and ETH)	52
9.1.3 Separate Accounts for Crypto Transactions	52
9.2 Wallet Address Verification	53
9.2.1 Mandatory Registration.....	53
9.2.2 Change Prevention for Security	53
9.2.3 Traceability and Transparency	53
9.3 Suspicious Activity Monitoring	53
9.4 Liquidity Management and Fund Accessibility.....	53
9.5 Benefits of Crypto-Specific Measures.....	54
9.5.1 Risk Mitigation.....	54
9.5.2 Regulatory Compliance	54
9.5.3 Player Trust	54
9.5.4 Operational Efficiency	54
10. Record Retention and Timeframes	55
10.1 Player Transaction Records	55
10.2 Bank and Crypto Account Statements	55
10.3 Internal Fund Reconciliation Reports.....	55
10.4 AML and KYC Compliance Records	55
10.5 Policy Change and Player Notification Records	56
10.6 Audit Records for Fund Segregation Practices	56
10.7 Operational Expense and Fund Transfer Records.....	56
10.8 Financial System Access Logs.....	56
10.9 Retention Practices	56

11. Appendices 57

Appendix A: Player Fund Segregation Process Flow..... 57

Appendix B: Bank Account Details and Segregation Mechanisms 59

Appendix C: Financial Reporting and Reconciliation Process 61

Appendix D: Regulatory Compliance Checklist..... 62

Appendix E: Player Communication Forms 64

Appendix F: Dispute Resolution Forms..... 65



Introduction

1-Introduction

Under the regulatory supervision of the Curacao Gaming Control Board, Mill Interactive B.V. is committed to maintaining the highest standards of financial security and integrity for all player funds related to its operations. In order to give our players, the best protection possible, this Player Fund Segregation Policy aims to provide precise guidelines for the management, protection, and separation of customer funds from corporate accounts.

Mill Interactive B.V. uses a strong fund segregation model that complies with legal requirements and industry best practices for remote gaming. This strategy guarantees that player balances are always accessible and protected, even in the unlikely event of insolvency, by ensuring that all player deposits are held in a way that protects them from any potential company liabilities.

Fund segregation is a key component of our larger commitment to openness, legal compliance, and player confidence. Our reputation as a responsible gaming provider is strengthened by giving our customers the assurance that their deposits are safe by clearly separating player funds from operational accounts. In order to stay in compliance with relevant laws and to adjust to changing industry standards and regulatory requirements, this policy is regularly reviewed and updated. To guarantee consistent application and adherence to policy directives, Mill Interactive B.V. also regularly audits its segregation procedures.

1.1 About Mill Interactive B.V.

Mill Interactive B.V. is a licensed and reputable entity in the online gaming industry, providing a diverse range of remote gaming services on a global scale. The company is registered under the Curacao Commercial Register and is regulated by the Curacao Gaming Control Board. With its incorporation under Curacao's jurisdiction, Mill Interactive B.V. operates in full compliance with the National Ordinance on OSshore Games of Hazard (NOOGH), a regulatory framework ensuring that all gambling activities adhere to stringent legal standards. Mill Interactive B.V. holds Company Number 162366 and has been granted license number OGL/2024/1282/0539 by the Curacao Gaming Control Board, eSective since July 16, 2025. This license empowers the company to legally conduct a wide range of online gaming operations, catering to clients located outside Curacao.

Under this license, Mill Interactive B.V. is authorized to organize, market, promote, manage, and support a broad array of remote gaming services. These services include various forms of interactive gambling, such as betting exchanges, online casinos, bingo, lotteries, and other interactive gaming products. With a commitment to offering engaging and secure online gaming experiences, Mill Interactive B.V. operates through sixteen primary domains: betorspin.com, betpublic.com, starzbet.com, baywin.com, bycasino.com, luxslot.com, bankobet.com, starzbet.kg, betira.com, zlot.com, northwin.com, jasino.com, ligobet.com, solobet.com, starora.com and cola.com. These platforms are designed to provide seamless and secure gaming options, attracting a diverse international audience seeking reputable and legally compliant gaming venues.

In line with its commitment to responsible and transparent operations, Mill Interactive B.V. prioritizes the security and management of player funds. Recognizing the importance of player trust and financial safety, the company has implemented a dedicated Player Fund Segregation Policy. This policy ensures that all player funds are held separately from operational funds, providing an additional layer of protection for customers' deposits. By keeping player funds distinct from business assets, Mill Interactive B.V. demonstrates its commitment to safeguarding player balances, ensuring that these funds remain accessible under any circumstances.

The Player Fund Segregation Policy is integral to the company's operational model and aligns with its regulatory obligations under Curacao law. Mill Interactive B.V. conducts regular audits and compliance checks to maintain strict adherence to this policy, thereby reinforcing the security and integrity of player funds. This rigorous approach is intended to protect players and support the company's reputation as a trustworthy and responsible gaming provider. Through its commitment to player fund segregation, Mill Interactive B.V. fosters a secure gaming environment, assuring customers that their funds are protected and accessible, and that the company operates with transparency and accountability.

1.2 Player Fund Segregation Commitment

Mill Interactive B.V. is committed to safeguarding player funds with the utmost diligence and transparency, ensuring a secure and trustworthy environment for all its customers. As a licensed gaming operator under the jurisdiction of the Curacao Gaming Control Board, Mill Interactive B.V. operates in compliance with the National Ordinance on OSshore Games of Hazard (NOOGH), adhering to strict regulatory standards that protect player interests. One of the cornerstones of these regulatory standards is the secure handling and separation of player funds from the company's operational and business assets, a practice that forms the basis of our Player Fund Segregation Policy.

This policy outlines our commitment to keeping player funds separate from the company's operational finances. In practice, this means that all player deposits and balances are held in dedicated accounts that are solely reserved for player funds. This segregation ensures that, in any situation whether business-related or financial the players' funds remain unaSected and fully accessible. Mill Interactive B.V. does not use these segregated funds for operational costs, investments, or other financial purposes; they are strictly reserved for players' gaming balances and withdrawals.

Our Player Fund Segregation Policy is designed to uphold player confidence by providing a high level of financial security and transparency. To further strengthen this commitment, Mill Interactive B.V. conducts regular audits and reviews of these dedicated player accounts. This ensures that our fund segregation practices are consistently maintained in accordance with regulatory standards, giving our customers confidence in the security of their deposits and winnings.

Moreover, as part of our commitment to best practices in the gaming industry, we have established comprehensive internal controls and accounting practices that provide clear oversight of all player-related transactions. These controls enable us to accurately track player funds, making sure they remain isolated from corporate funds and are easily identifiable at all times. Our internal procedures are audited periodically by independent third-party entities to ensure ongoing compliance with both regulatory standards and our own internal policies.

Mill Interactive B.V. also places great importance on transparency with our customers, providing clear information about fund segregation within our terms and conditions and customer service communications. Our players are informed about the measures in place to protect their deposits and can rest assured that our commitment to fund segregation is backed by robust policies and controls.

In the event of an insolvency or other financial disruption, our Player Fund Segregation Policy is structured to provide protection for player funds. These funds would remain available for withdrawal, as they are not co-mingled with the company's general assets, further emphasizing our commitment to player protection and trustworthiness.

Overall, Mill Interactive B.V.'s Player Fund Segregation Policy is not just a regulatory requirement; it reflects our dedication to responsible and transparent business practices. By prioritizing the security and availability of player funds, we reinforce our status as a responsible gaming operator committed to protecting customer interests. This commitment to fund segregation is an integral part of our mission to oSer a secure, reliable, and enjoyable gaming experience for players on platforms, where they can engage with confidence.

1.3 Objective / Purpose

The purpose of Mill Interactive B.V.'s Player Fund Segregation Policy is to protect the integrity and financial stability of player funds in our online gaming community. This policy serves as a framework to safeguard player assets from unauthorized access or misuse, ensuring that deposits, winnings, bonuses, and other player-related funds are fully protected and accessible at all times. The policy reaSirms our dedication to openness and trust, which are cornerstones of our relationship with players, by rigorously separating these funds from corporate and operational accounts.

The primary purposes of this policy include:

- 1. Protection of Player Funds:** Ensuring that all player funds are kept separate from the business's operating funds in special accounts. This division ensures that player funds are safe and accessible to players at all times by preventing their misuse or illegal use.

- 2. Financial Transparency and Trust:** Mill Interactive B.V. fosters customer confidence and trust by offering a transparent and safe management structure for player funds. This openness gives players confidence in the security of their financial dealings with us and is consistent with our dedication to functioning as a responsible and reliable gaming provider.
- 3. Regulatory Compliance:** The policy is designed to ensure that Mill Interactive B.V. meets the regulatory requirements set forth by the Curacao Gaming Control Board (GCB) and complies with any additional mandates from applicable jurisdictions. Adhering to these regulations is crucial not only for operational integrity but also for maintaining the company's license and regulatory standing.

1.4 Scope of Policy

All money deposited by players with Mill Interactive B.V. for use in online gaming activities across its platforms, such as betorspin.com, betpublic.com, starzbet.com, baywin.com, bycasino.com, luxslot.com, bankobet.com, starzbet.kg, betira.com, zlot.com, northwin.com, jasino.com, ligobet.com, solobet.com, starora.com and cola.com, is covered by this policy's scope. In particular, the following player fund categories are covered by the policy:

- **Deposits:** Funds that players transfer to their gaming accounts for the purpose of wagering or playing on our platforms.
- **Winnings:** Any funds accrued by players through their participation in Mill Interactive B.V.'s gaming activities, such as casino games, betting exchanges, and other interactive games.
- **Bonuses:** Promotional funds or credits granted to players as part of marketing or loyalty initiatives. These funds, while company-issued, are managed under the same segregated framework to ensure their availability for player use.
- **Any Other Player-Related Funds:** This includes all additional funds associated with players' accounts, such as refunds, adjustments, and incentives that may impact player balances.

1.5 Application of Policy

This Player Fund Segregation Policy applies to all funds deposited by players with Mill Interactive B.V. for use in its online gaming activities, encompassing deposits, winnings, bonuses, and any other funds credited to player accounts. The policy's scope extends to all operations, platforms, and services provided under Mill Interactive B.V., including but not limited to domains such as betorspin.com, betpublic.com, starzbet.com, baywin.com, bycasino.com, luxslot.com, bankobet.com, starzbet.kg, betira.com, zlot.com, northwin.com, jasino.com, ligobet.com, solobet.com, starora.com and cola.com, ensuring that player funds remain protected and segregated across all gaming activities.

The application of this policy requires that all departments, personnel, and systems involved in handling player funds adhere to strict fund segregation protocols. This includes accounting, finance, customer service, and any third-party service providers authorized to process transactions on behalf of the company. Each relevant department and individual are responsible for ensuring that their actions align with the segregation requirements, protecting player funds from unauthorized use or commingling with operational accounts.

Key elements of this policy's application include:

1. **Dedicated Segregated Accounts:** Player funds are to be held in designated accounts that are separate from the company's operational accounts. These segregated accounts are used exclusively for player transactions, including deposits, withdrawals, and other account-related movements, ensuring complete isolation from business finances.
2. **Transaction Monitoring and Controls:** All transactions involving player funds are subject to monitoring, with strict internal controls in place to prevent unauthorized access or use. Every deposit, withdrawal, and transfer is tracked within our financial management systems to ensure compliance with the segregation policy.

3. **Access Restrictions:** Access to player fund accounts is limited to authorized personnel only, with stringent access controls to prevent unauthorized handling. The company implements multi-level approval processes and audit trails to safeguard player funds against internal or external misuse.
4. **Regular Reconciliation and Audits:** Player fund accounts are reconciled regularly to ensure that balances accurately reflect the total player liabilities. In addition, independent audits are conducted periodically to assess compliance with segregation standards, verifying that player funds remain protected and accessible.
5. **Third-Party Service Providers:** Any third-party payment processors or financial institutions involved in the handling of player funds must comply with Mill Interactive B.V.'s fund segregation standards. Service agreements are in place to ensure that these entities understand and adhere to the same principles of player fund protection and segregation.
6. **Compliance with Regulatory Requirements:** The policy is designed to meet the requirements of the Curacao Gaming Control Board (GCB) and any other relevant jurisdictions. Compliance with this policy is essential for maintaining Mill Interactive B.V.'s licensing status and regulatory standing.

This policy applies to all personnel within Mill Interactive B.V., including management, finance, customer service, and thirdparty service providers who handle or have access to player funds. Adherence to the policy is mandatory and monitored through routine audits, staS training, and continuous process improvement. Non-compliance with the Player Fund Segregation Policy may lead to disciplinary action or termination of contracts with third-party service providers.

Mill Interactive B.V. seeks to oSer a safe and open gaming environment that puts its players' financial security first by implementing this policy in all pertinent areas.

1.6 Review Frequency of Player Fund Segregation Policy

The Player Fund Segregation Policy is subject to regular and systematic review to ensure ongoing compliance with regulatory requirements, industry best practices, and the evolving operational needs of Mill Interactive B.V. This policy will be reviewed and updated at least annually, or more frequently as required by changes in applicable regulations, licensing requirements, or operational procedures.

The review process is led by the Compliance and Risk Management departments, in coordination with relevant stakeholders, including the Finance and Internal Audit teams. During each review, the policy is assessed for eSectiveness, relevance, and alignment with the standards set by the Curacao Gaming Control Board and any other regulatory authorities governing our operations.

In addition to scheduled annual reviews, the policy will also undergo an immediate review in the event of:

1. **Regulatory Changes:** Any modifications to local or international regulatory standards impacting fund segregation will prompt an immediate review to ensure compliance.
2. **Internal Audit Findings:** If internal audits identify risks or potential weaknesses in the current fund segregation practices, the policy will be reviewed and adjusted to address these findings.
3. **Significant Operational Changes:** Major changes to the company's financial systems, processes, or third-party partnerships involving player funds may require policy updates to reflect new or adjusted segregation procedures.
4. **Incident or Breach:** In the unlikely event of any incident impacting player fund security, an immediate review will be conducted to assess and enhance existing measures.

Each review aims to strengthen the eSectiveness and rigor of the Player Fund Segregation Policy, ensuring that it continues to protect player funds in a secure, transparent, and compliant manner. All changes or updates to the policy will be documented, and relevant personnel will receive training or briefings on any new requirements or practices.

1.5 Definitions

Player Funds:

All monetary or Crypto Currency deposits, winnings, bonuses, and other funds associated with players' accounts within the gaming platform, held exclusively for the benefit of the player and segregated from company operational funds.

Segregated Account:

A dedicated bank or financial institution account where player funds are held separately from the company's operating funds, ensuring protection against any financial obligations or liabilities of the company.

Operational Funds:

The company's own assets and finances used for business operations, not including any funds deposited or earned by players.

Unauthorized Use:

Any use or withdrawal of player funds by the company or its representatives for purposes other than designated player-related transactions, such as deposits, withdrawals, or payouts.

Gaming Control Board (GCB):

The regulatory authority that issues and monitors compliance with gaming licenses for operators under its jurisdiction, in this case, the Curacao Gaming Control Board.

National Ordinance on ODshore Games of Hazard (NOOGH):

A regulatory framework established under Curacao law, governing the operation of oSshore gaming and betting services to ensure legal compliance and player protection.

Compliance Audit:

A formal, structured review process to assess whether the company's fund segregation practices meet legal, regulatory, and policy standards.

Independent Auditor:

A third-party professional or firm engaged to perform audits and verify compliance with fund segregation and other regulatory requirements without bias.

Deposits:

Amounts transferred by players into their gaming accounts for the purpose of participating in the company's online gaming activities.

Winnings:

Funds or rewards earned by players through successful wagers or participation in gaming activities.

Bonuses:

Promotional credits or funds granted to players as part of marketing, loyalty, or incentive programs, which may have specific usage conditions.

Player Account:

A registered and verified account on the gaming platform used by a player to deposit funds, place wagers, receive winnings, and access bonuses.

Withdrawals:

Requests made by players to transfer funds from their gaming accounts to their personal financial accounts or wallets.

Fund Segregation:

The practice of maintaining player funds in separate accounts from company operational funds to prevent comingling and ensure the protection of player assets.

Liquidity Requirement:

The financial obligation to maintain adequate funds to cover all player balances, ensuring players can withdraw their funds at any time without delay.

Financial Reporting:

Regular documentation and accounting of player funds, ensuring accuracy, transparency, and accountability in fund management.

Risk Management:

Processes and controls implemented to minimize the risk of loss, misuse, or unavailability of player funds, often including the segregation of funds.

Responsible Gaming:

A framework within which Mill Interactive B.V. operates to ensure safe, fair, and secure gaming experiences, including policies that protect players financially and socially.

Third-Party Payment Processors:

External companies or platforms authorized to process deposits and withdrawals on behalf of Mill Interactive B.V., while ensuring adherence to the fund segregation policy.

Reserve Fund:

A secondary or backup account maintained by the company to ensure there are additional resources available in the event of unforeseen financial pressures or risks impacting player fund security.

Access Controls:

Security protocols and restrictions designed to prevent unauthorized personnel from accessing or managing player funds, reinforcing fund protection and regulatory compliance.

Segregation Audit:

A specific type of audit focused solely on verifying the adequacy of fund segregation practices and ensuring compliance with this policy.

Policy Violation:

Any act or omission that breaches the terms of the Player Fund Segregation Policy, potentially compromising player fund protection and regulatory compliance.

Player Protection:

The overall set of practices and policies aimed at safeguarding players' funds, personal data, and gaming experience, of which fund segregation is a critical component.

Licensee:

Mill Interactive B.V., the company licensed by the Curacao Gaming Control Board to oSer online gaming services under specific terms and conditions, including the obligation to maintain player fund segregation.

Policy Review:

The periodic assessment and update of this Player Fund Segregation Policy to ensure ongoing relevance, effectiveness, and alignment with regulatory requirements.

Financial Integrity:

The principle of maintaining honesty, accuracy, and transparency in financial transactions, particularly those involving player funds, to build trust and accountability.

Insolvency:

The state of being unable to pay debts when they come due, where proper fund segregation ensures player funds remain protected and available for withdrawal despite company financial distress.

Custodial Responsibility:

The obligation of Mill Interactive B.V. to act as a responsible custodian of player funds, ensuring they are handled with integrity, segregated from operational assets, and managed solely for player-related transactions.

Player Fund Management System:

The internal systems and processes designed to manage, track, and account for player funds in compliance with this policy, ensuring full and continuous fund segregation.

Cryptocurrency (Virtual Assets):

Cryptocurrency is a digital or virtual asset that uses cryptography for security and operates on decentralized blockchain technology. It can be used for payments, investments, and transactions, and it presents specific risks related to money laundering, fraud, and terrorist financing due to its pseudonymous nature.

Virtual Asset Service Provider (VASP):

A Virtual Asset Service Provider is any individual or entity that facilitates the exchange, transfer, or safekeeping of virtual assets (cryptocurrency), or oSers financial services related to the issuance of virtual assets. VASPs must comply with AML regulations, including customer due diligence and reporting requirements.

2. Segregation of Funds

Mill Interactive B.V. is dedicated to securely segregating player funds to protect them from unauthorized access, misuse, or risk. To ensure player deposits, winnings, and bonuses remain secure, the company has established strict practical and regulatory measures. These include the use of dedicated bank accounts and crypto wallets exclusively for player funds, entirely separate from operational finances. Regular monitoring, reconciliation, and dual authorization for transactions ensure ongoing protection and accessibility. These practices reinforce that player funds are held securely and available at all times for withdrawals and other player transactions, prioritizing transparency and player trust.

2.1 Separate and Dedicated Accounts

Mill Interactive B.V. ensures that all player funds deposits, winnings, and any other funds held for players are kept separate from the company's own operating funds. Segregation of player funds is a crucial component of regulatory compliance and consumer protection. The primary objective is to prevent commingling of player funds with operational funds,

ensuring that player funds are protected and available for withdrawal at all times, even in the event of financial distress or insolvency.

2.1.1 Separate Accounts

Mill Interactive B.V. takes significant steps to ensure that player funds are separated from the company's operational funds, in compliance with the regulations. The company holds player funds in dedicated segregated accounts, which are separate from accounts used for business operations or payments to service providers, employees, or other operational expenses.

1) Separate Bank Accounts:

- a. The company holds two separate bank accounts with its payment provider, Payco, specifically designed for the management of player funds. These accounts are used for:
 - i. **Deposits:** Player deposits are directed into this account.
 - ii. **Withdrawals:** When players request withdrawals, the funds are paid from this account, ensuring that player balances are always available and protected.
- b. This segregation ensures that the funds for player transactions (deposits, withdrawals) are kept exclusively for player activities and are not used for any operational business activities.

2) Cryptocurrency Accounts: The company also uses dedicated cryptocurrency wallets for managing player deposits and withdrawals in crypto. These wallets are separate from other wallets used for oSice expenses or payments to partners.

3) Operational Accounts: In addition to the player accounts, the company also maintains other operational accounts, such as a main account for oSice expenses and accounts for software providers and other partners. These accounts are used for day-to-day business transactions, and funds in these accounts are strictly reserved for operational use, ensuring no commingling with player funds.

3.1.2 Account Labelling and Documentation 1)

Account Labelling:

Each account used for holding player funds is clearly labelled and designated as a "Player Fund Account" to ensure transparency and easy identification. This labelling ensures that players' funds are distinguishable from the company's operating funds and helps ensure that there is no mix-up between player funds and funds used for business purposes. The accounts are named accordingly, and internal systems reflect this labelling as well, ensuring that no accidental transfers are made between operational and player accounts.

In practice: The Payco account used for player deposits and withdrawals is distinctly separate from the company's main operational account that is used for oSice expenses and sending funds to Europe for paying software providers or other operational activities.

2) Internal Documentation:

The company maintains internal documentation to ensure accurate tracking of all transactions involving player funds. This includes:

- a. **Tracking Account Purpose:** Internal records track each segregated account's purpose (e.g., deposits, withdrawals, bonuses) to ensure that funds are used strictly for their intended purpose.
- b. **Transaction Logs:** The company maintains detailed records of every transaction in player fund accounts, documenting each deposit, withdrawal, transfer, or bonus credited to players. This provides clear, auditable records of funds movement.

- c. **Reconciliations:** Regular reconciliations of the player funds accounts are performed to ensure that the amounts in these accounts align with the company's records and player liabilities. These reconciliations are key for internal audits and regulatory reviews to demonstrate compliance with fund segregation requirements.

3) Documentation for External Audits and Regulatory Reviews:

The company also keeps the necessary documentation for external audits and reviews from regulatory authorities (such as the Curacao Gaming Control Board or other jurisdictions). The company can provide proof of the segregation of player funds through detailed transaction logs and reconciliations that track how player deposits and withdrawals are handled.

4) Transparency and Compliance:

This internal documentation ensures the company can demonstrate compliance with segregation of funds regulations, providing transparency to both regulators and players.

2.1.3 Managing Funds for Player Payouts

A. Ensuring Funds Are Available for Payouts:

- 1) The company takes active steps to ensure that there are always sufficient funds available in the dedicated player accounts to process player withdrawals.
 - i. The company maintains a 10% buffer of the previous month's revenue and current month's total balance in both the bank and crypto accounts. This buffer acts as a reserve to cover any player withdrawal demands, even in situations where there might be a sudden surge in player withdrawals.
 - ii. This reserve ensures that the company is always able to meet player withdrawal requests, preventing liquidity issues.

2) Top-Up Mechanism:

- i. In the event that the player account balance becomes insufficient (due to extraordinary circumstances or an unexpected surge in withdrawals), the company can top-up the player funds from its main operational account. This ensures that players' balances are always covered and available for payout.
- ii. This mechanism provides an additional layer of security, allowing the company to maintain liquidity without requiring immediate transfers from other payment processors or financial institutions.

B. No Known Issues:

The company has stated that there has never been an issue where the player account balance was insufficient to meet withdrawal demands, indicating that the current system is working effectively.

2.1.4 Investment or Merchant Reserve Accounts Investment

Accounts:

The company does not appear to use investment accounts for player funds. All funds in the segregated player accounts are in liquid form, meaning they are available for immediate withdrawal and use by players.

Merchant Reserve Accounts:

There are no merchant reserve accounts used for holding player funds. The company ensures that player funds are held only in the dedicated player accounts mentioned above (both bank and crypto), which are fully accessible for player payouts.

2.1.5 Risk Controls and Contingency Planning Risk

Controls:

The company's primary risk control is the 10% buffer maintained in player fund accounts to ensure there is always enough liquidity to cover withdrawals. This practice mitigates the risk of insufficient funds and prevents any disruptions in the payout process.

Contingency Plan:

The company has a contingency plan in place, where it can transfer funds from its main operational account to the player accounts if needed. This provides an additional safety net to ensure there are no delays in player payouts, even in extraordinary circumstances.

Mill Interactive B.V. has established a well-structured approach to managing and segregating player funds to ensure compliance with regulatory requirements and provide protection to players. The company uses separate bank and crypto accounts, which are clearly labelled and dedicated solely to handling player deposits and withdrawals. Internal documentation ensures proper tracking and transparency of these accounts, while a buffer fund is maintained to guarantee that player payouts can always be met. Additionally, the company can top-up player accounts from operational funds, if necessary, although this has not been required in practice.

2.2 Use of Reputable Financial Institutions

1) Bank and Crypto Wallet Selection:

- a. Mill Interactive B.V. ensures that player funds are held in reputable financial institutions, whether in bank accounts or crypto wallets, to safeguard assets. These institutions must have a proven track record of security and reliability, ensuring robust protection for player funds.
- b. For crypto transactions, the company uses a secure multi-signature wallet specifically for player deposits and withdrawals. This wallet setup enhances security by requiring multiple signatures before transactions are executed, reducing the risk of unauthorized access and ensuring the integrity of the funds.

2) International Location and Jurisdiction Considerations:

- a. If player funds are held in accounts located outside of Curacao, Mill Interactive B.V. carefully evaluates the jurisdiction and regulatory standards of the institutions to ensure compliance with both local and international regulations concerning fund protection.
- b. The company ensures that funds held in overseas accounts remain accessible and secure, even in the event of financial distress or insolvency. This is achieved by verifying that the financial institution complies with laws designed to protect customer funds across multiple jurisdictions.
- c. Mill Interactive B.V. ensures that its multi-jurisdictional operations meet regulatory requirements for fund protection, guaranteeing that player funds are not at risk due to insolvency or other financial issues, wherever they are located.

2.3 Monitoring and Reconciliation of Accounts

1) Regular Reconciliation:

Mill Interactive B.V. ensures the accuracy of player fund accounts through daily reconciliations conducted by the finance department. This process involves comparing the account balances in player fund accounts with transaction records from the company's internal systems. Discrepancies, if any, are flagged, and corrective measures are taken promptly. These daily reconciliations are thoroughly documented, with logs maintained for audit purposes to ensure a transparent and traceable process.

In addition to daily reconciliations, a monthly review is conducted by a senior compliance officer. This review ensures that the daily reconciliations align with regulatory requirements and internal policies, and that the segregation of player funds is maintained properly.

2) Third-party Audits:

To provide an additional layer of independence and transparency, Mill Interactive B.V. engages third-party auditors to conduct quarterly reviews of its player fund accounts. These audits ensure that player funds are correctly segregated from operational funds and that account balances accurately reflect the company's total liabilities to customers. This external review helps verify compliance with both regulatory requirements and internal controls.

3) Ongoing Monitoring for Liquidity:

The company ensures it maintains sufficient liquidity to meet player withdrawal demands by setting and monitoring a liquidity threshold. If the balance in player accounts falls below this threshold, funds are transferred promptly from other accounts to ensure there are enough funds available to meet day-to-day payout obligations. This process is continuously monitored to prevent liquidity issues that could impact the company's ability to process withdrawals on time.

2.4 Reporting Requirements and Compliance with Licensing Regulations

1) Regular Reporting to Regulatory Bodies:

- a. In compliance with the Curacao Gaming Control Board regulations, Mill Interactive B.V. is required to report any changes to its fund segregation practices. This includes updating the regulatory body on any significant activity within the accounts holding customer funds.
- b. The company provides evidence of total funds held in these dedicated accounts to ensure that customer liabilities are fully met at all times. Regular reports are submitted to demonstrate ongoing compliance with segregation requirements, showcasing that player funds are properly separated from operational funds and remain protected.
- c. Additionally, the company ensures that it adheres to regulatory expectations by maintaining transparent and detailed records that reflect the proper segregation of funds, and these records are provided as part of compliance checks or during audits.

2) Customer Transparency:

- a. Mill Interactive B.V. prioritizes customer transparency by informing players about its fund segregation practices in the Terms and Conditions. This ensures players understand how their funds are segregated and protected, reinforcing their confidence in the company's financial practices.
- b. If there are any material changes to the fund protection arrangements, Mill Interactive B.V. promptly communicates these changes to players. This may involve updating the Terms and Conditions and requiring players to acknowledge the changes before proceeding with further deposits. This ensures players are fully informed about how their funds are managed and protected at all times.

3) Geographic Location of Funds:

Player funds are held in dedicated accounts, which operates within an unregulated Europe environment. While these funds are not subject to specific regulations, the company still complies with the segregation requirements set out by the Curacao Gaming Control Board and other relevant international standards.

4) Demonstrating Fund Availability for Global Liabilities:

Mill Interactive B.V. demonstrates its ability to meet global liabilities by submitting annual account statements to regulators. These statements provide transparency into the company's financial position and ensure that the total available funds are sufficient to cover customer liabilities, regardless of the jurisdiction in which the customers are based. This helps assure regulators that the company is financially stable and capable of meeting all player withdrawal requests across its operational territories.

3.5 Risk Management and Contingency Planning

A. Contingency Planning for Insolvency:

Mill Interactive B.V. has established robust contingency plans to safeguard player funds in the event of financial distress or insolvency. These plans ensure that, even in situations where the company faces financial difficulties or potential bankruptcy, player funds are given priority and remain protected. The contingency plans are specifically designed to prioritize the protection of player funds, ensuring that these funds are handled separately from the company's operational or business funds, which may be subject to claims by creditors in the event of insolvency. The company's contingency measures include the following:

- a. **Segregated Accounts:** Player funds are maintained in separate, dedicated accounts, making it easier to identify and separate these funds from operational or creditor claims.
- b. **Liquidity Management:** Mill Interactive B.V. maintains a liquidity threshold in its accounts to ensure that it has sufficient funds to meet player payouts even in the event of financial difficulties. This threshold ensures that the company can continue to process player withdrawals without interruption.
- c. **Escrow Arrangements:** If required, funds could be transferred into escrow accounts to ensure they are legally protected and managed by a third party. These accounts are only accessible under specific conditions, such as the fulfilment of payout obligations to players.
- d. **Clear Communication with Stakeholders:** In case of insolvency or financial distress, the company's contingency plan includes a communication strategy to inform both players and regulators about the status of their funds and the steps being taken to protect their interests.

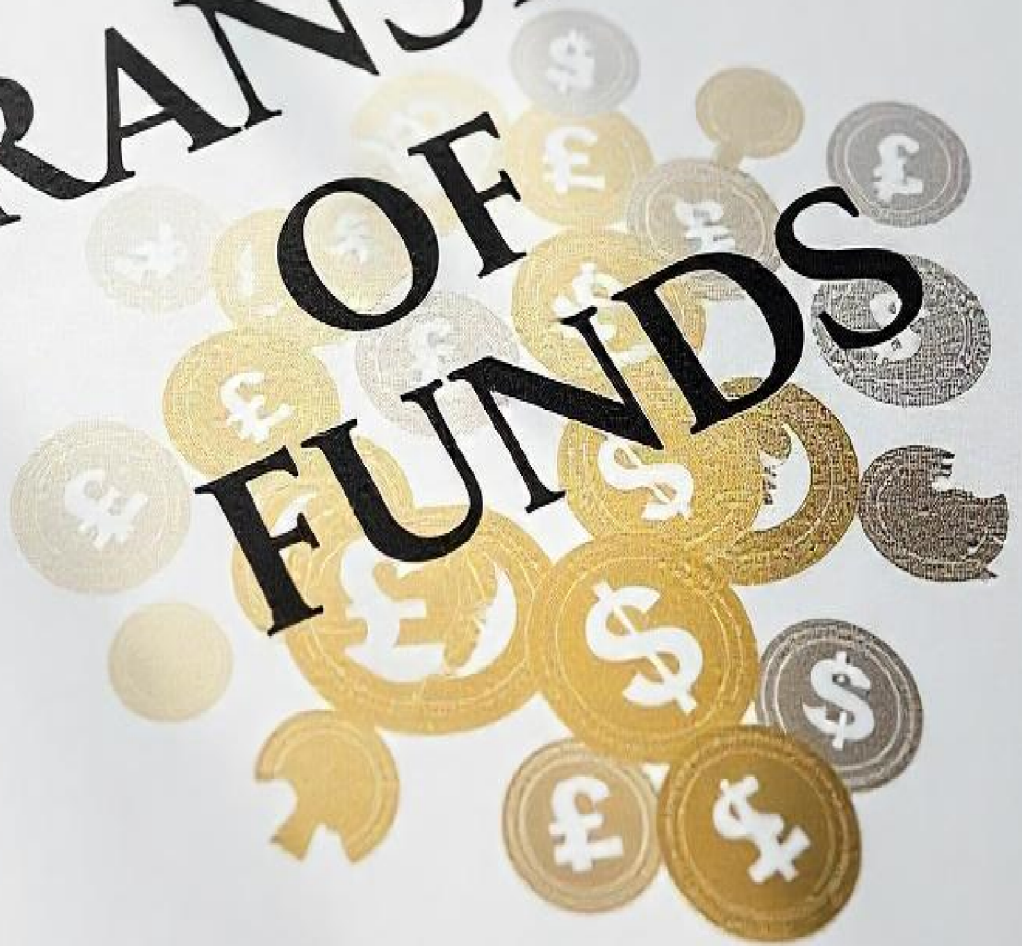
B. Funds Held in Trust:

- a. If necessary, Mill Interactive B.V. could place player funds in trust accounts to offer an additional layer of protection. Trust accounts are legally separate from the company's general operating funds, ensuring that the funds are protected from claims by creditors in the event of insolvency.
- b. In jurisdictions where such arrangements are supported, trusts can be used to shield player funds from being seized or accessed by the company's creditors, making them secure from financial risk.
- c. The legal structure of trust accounts ensures that the funds are dedicated solely for player withdrawals and are protected by fiduciary duties. The trustee managing the account would be obligated to ensure the funds are available to meet player obligations before being used for any other purpose.
- d. This arrangement gives both regulators and players confidence that their funds are protected and will be available for withdrawal even if the company faces financial challenges.
- e. In cases of insolvency, the trust structure allows the company to prioritize player claims over other financial obligations, further reducing the risk to player funds.

Mill Interactive B.V. provides openness and reassurance to regulators and players by putting these thorough risk management and contingency plans into place, which guarantee that its players' money is secured not just during regular operations but also in the event of unforeseen financial difficulties.

This enhanced framework ensures that player funds are always secure, accessible, and managed in a way that aligns with both regulatory requirements and industry best practices for fund segregation in remote gambling. Through these measures, Mill Interactive B.V. upholds a commitment to transparency, player trust, and responsible fund management.

TRANSFER OF FUNDS



3. Transfer of Fund

Mill Interactive B.V. has implemented stringent policies for transferring funds between player accounts and operational accounts to maintain the integrity of player balances and comply with its commitment to fund segregation. These policies emphasize transparency, security, and accuracy in all fund transfers, ensuring that player funds are safeguarded at all stages of the process.

1. **Transparency:** All fund transfers are carefully documented with clear, auditable records. Each transaction includes details such as the date, amount, and purpose of the transfer, providing a comprehensive audit trail for internal and regulatory review.
2. **Security:** Transfers between accounts are conducted through secure, reliable methods using reputable financial institutions. Dual authorization is required for transactions involving player funds, which must be approved by both the CFO and Head of Compliance. This control prevents unauthorized access and misuse of player funds.
3. **Accuracy:** To ensure accurate fund management, the Finance Department performs daily and monthly reconciliations. This regular review verifies that player account balances match internal records and helps promptly identify any discrepancies.

Overall, these policies not only uphold Mill Interactive B.V.'s commitment to fund segregation but also align with regulatory standards, demonstrating a proactive approach to protecting player funds.

3.1 Secure and Reliable Transfer Methods

Mill Interactive B.V. places a strong emphasis on security and reliability for all transactions between player accounts and operational accounts. To uphold the company's commitment to safeguarding player funds and maintaining financial transparency, each transfer is conducted through highly secure and trusted channels, ensuring the integrity of player balances and compliance with fund segregation policies. **1. Trusted Financial Partnerships:**

Mill Interactive B.V. collaborates with reputable financial institutions and payment providers to process player-related transfers. The company partners with Payco, a well-established payment provider that offers advanced security features and is known for its reliability. Mill Interactive B.V. ensures that player funds are safeguarded through secure protocols and reduces the dangers involved in payment transfers by collaborating with reliable financial institutions.

2. Advanced Security Measures:

Each transaction is safeguarded by the payment provider's security protocols, including multi-factor authentication, encryption, and fraud detection systems. These features help prevent unauthorized access and ensure that all transfers meet the highest industry standards. Additionally, Mill Interactive B.V. adheres to these protocols, which includes compliance with regulatory requirements specific to the jurisdiction, adding another layer of protection.

3. Rigorous Verification Process:

A transfer goes through a multi-step verification process before being performed. This process requires verifying the source of the funds, the amount being transferred, and the destination account, all of which must match Mill Interactive B.V.'s internal records. Transfers are only authorized once these details are validated, reducing the risk of error or unauthorized access.

4. Limited Access and Dual Authorization:

To initiate fund transfers, dual authorization is required from both the CFO and the Head of Compliance. This two-person verification process limits access to the funds to a small group of authorized personnel, ensuring accountability and reducing the potential for fraudulent or erroneous transactions.

5. Protection Against Operational Errors:

Mill Interactive B.V. reduces the possibility of operational errors by making sure that only authorized persons are able to start financial transfers and by requiring thorough inspections at every stage. Every transaction is recorded and tracked in an auditable log, which provides a reliable paper trail for internal review and external

audits. This detailed record-keeping also serves as a deterrent to unauthorized transactions, as each transfer can be traced back to specific individuals and supporting documentation.

6. Compliance and Regulatory Oversight:

The use of secure and reliable transfer methods is aligned with regulatory expectations for fund segregation and protection in the iGaming industry. A proactive approach to compliance is shown by Mill Interactive B.V. by operating within the guidelines established by the Curacao Gaming Control Board and other authorities. The company's practices are designed to withstand regulatory scrutiny and provide assurance to stakeholders regarding the safety of player funds.

7. Continuous Monitoring and Assessment:

Mill Interactive B.V. performs regular monitoring of all fund transfer processes to ensure that they remain secure, reliable, and compliant with policy requirements. Periodic assessments are conducted to identify and address any potential vulnerabilities or process improvements. This proactive approach helps the company maintain high standards of security in fund management over time.

Mill Interactive B.V. successfully reduce the risks involved in managing player funds by giving priority to safe and dependable transfer method which ensuring that player funds are protected from unauthorized access or operational errors and that transfers are managed transparently and in full compliance with industry standards. This robust approach to security strengthens player confidence and supports the company's commitment to financial integrity.

3.2 Documentation and Auditable Records

Mill Interactive B.V. upholds a rigorous approach to documenting all fund transfers, ensuring a transparent and traceable record of transactions between player and operational accounts. This documentation process is essential for both maintaining compliance with regulatory standards and providing a reliable, detailed audit trail of each transaction.

Here's a detailed breakdown of the policies and practices involved:

1. Comprehensive Transaction Records:

Every fund transfer is recorded with complete details, including the date, time, amount, and purpose of the transfer. Each transaction entry explains why the transfer was necessary, ensuring clarity on its nature whether for player-related purposes, such as replenishing funds during high withdrawal periods, or for operational needs, like incidental expenses. Mill Interactive B.V. guarantees that each transfer has a precise, recorded explanation by recording these details.

2. Transparency and Traceability:

These detailed records contribute to full transparency of all financial movements within the company. By providing a structured record of each transfer, internal auditors and compliance officers have clear evidence to verify the nature and appropriateness of each transaction. This transparency also enables external auditors or regulators to assess fund movement without ambiguity, further demonstrating Mill Interactive B.V.'s commitment to responsible and compliant fund management.

3. Accountability and Alignment with Fund Segregation Policy:

The documentation process ensures that all transactions are aligned with the company's fund segregation policy, which mandates that player funds are used solely for player-related transactions and kept separate from operational expenses. This principle is reinforced by documenting transfers with precise reasons, making it clear that any fund movement adheres to this policy. This alignment supports the company's regulatory commitment to protecting player funds and enhances internal accountability by clearly outlining acceptable uses for each transfer.

4. Reliable Audit Trail:

The documentation serves as an audit trail, providing Mill Interactive B.V. with a reliable history of all fund transfers over time. This audit trail is a vital resource during internal or external audits, as it allows auditors to

trace each transaction back to its origin and purpose, affirming the integrity of the fund management process. A documented trail of every fund movement also serves as a deterrent to potential misuse, as each transfer is subject to review and must align with company policies.

5. Routine Reconciliation and Discrepancy Management:

To maintain accuracy and data integrity, Mill Interactive B.V. performs daily and monthly reconciliations of its accounts. Any discrepancies found during these routine checks are immediately logged and investigated to ensure the transfer records remain accurate and consistent. Promptly addressing these discrepancies is essential for maintaining internal trust in the documentation process and upholding the integrity of fund management.

6. Continuous Compliance with Regulatory Requirements:

Mill Interactive B.V. exhibits adherence to regulatory requirements, especially those established by the Curacao Gaming Control Board, which call for openness and stringent financial segregation procedures, by keeping thorough and auditable records. Documenting each fund transfer with precision provides tangible evidence that the company is fulfilling its regulatory obligations and protecting player funds as mandated.

7. Enhanced Internal Control and Oversight:

The requirement for meticulous documentation adds a layer of oversight to fund management, as each transaction undergoes review to ensure that it meets internal and external compliance requirements. The Head of Finance and Compliance Department has access to these records for regular review, helping identify and correct any irregularities before they escalate, ensuring a well-managed and robust financial system.

8. Mitigating Operational Risks:

Mill Interactive B.V. reduces the possibility of mistakes, misallocations, or illegal activities by making sure that every financial movement is backed up by comprehensive documentation. Clear, auditable records minimize the risk of misuse and provide assurance that all transfers serve legitimate, justified purposes.

Through detailed documentation and auditable records, Mill Interactive B.V. reinforces a policy of transparency, accountability, and regulatory compliance. This approach ensures that fund transfers are carefully monitored, systematically justified, and securely managed, building trust among players, regulators, and internal stakeholders.

3.3 Timely Completion of Transfers

Mill Interactive B.V. has a dedicated policy to ensure that all fund transfers, especially those related to player withdrawals, are completed promptly. This commitment to timeliness is vital in maintaining the liquidity of player accounts and meeting players' withdrawal needs without delay. The company's approach includes structured procedures, close monitoring, and contingency measures to ensure that players always have access to their funds. Here's an in-depth look at the practices involved in achieving timely transfers:

1. Prioritizing Player Withdrawals:

Mill Interactive B.V. places player withdrawal requests at the top of its fund transfer priorities, ensuring that any transfer from the player accounts to external bank accounts or wallets occurs without delay. This emphasis on timeliness reassures players that they can access their funds whenever needed, promoting trust and reliability in the company's services.

2. Active Liquidity Monitoring:

The Finance Department continuously monitors the timing and frequency of transfers between player and operational accounts to ensure that the player accounts remain liquid. This monitoring aligns with the

company's liquidity policy, which includes maintaining 10% of the previous month's revenue plus the current balance of player deposits to ensure adequate funds are always available.

3. Compliance with Liquidity Requirements:

Mill Interactive B.V. anticipates possible swings in withdrawal demands by keeping reserves that equal or above player deposit levels. This careful liquidity management is crucial for maintaining compliance with the company's fund segregation policy, which prohibits the use of player funds for operational needs and requires these funds to be available exclusively for player-related transactions.

4. Prevention of Transfer Delays:

Mill Interactive B.V. ensures that each transfer request is processed promptly to avoid any potential delays that could interfere with the timely fulfilment of withdrawal demands. A delay in completing transfers would not only hinder players' access to their funds but could also compromise liquidity, leading to potential noncompliance with fund segregation standards.

5. Efficient Processing of Withdrawal Surges:

In situations where there is a sudden or extraordinary surge in withdrawal requests, Mill Interactive has a rapid response procedure in place to address the increased demand. The company can transfer additional funds from its operational account to the player fund account immediately, ensuring players can withdraw funds without delay.

6. Maintaining Segregation Compliance:

All transfer procedures are carefully structured to comply with the fund segregation policy, ensuring that operational funds and player funds remain distinct. The quick response protocol for topping up player accounts from operational funds upholds this segregation, as funds are only temporarily shifted to support player withdrawals and are not co-mingled for general operational purposes.

7. Internal Controls on Transfer Timing:

The Finance Department, tasked with overseeing all fund movements, enforces strict internal controls to ensure that transfers meet the set timing standards. These controls include detailed documentation of each transaction's timing, amount, and purpose, allowing for accountability and minimizing delays due to processing errors or oversight.

8. Regular Reporting and Oversight:

To ensure ongoing compliance and efficiency in transfer timing, Mill Interactive B.V. generates regular reports on fund movements between accounts. These reports are reviewed by senior management to confirm that transfers are completed in a timely manner and that liquidity requirements are consistently met.

9. Transparency with Players:

Mill Interactive B.V. also communicates its commitment to prompt transfers through transparent policies shared with players. By clarifying that withdrawals are prioritized and supported by adequate liquidity, the company enhances player confidence in its reliability and adherence to regulatory expectations.

10. Audit Trails for Transfer Timing:

Documenting each transfer with precise timestamps and justifications provides an audit trail that verifies Mill Interactive B.V.'s adherence to timely transfer policies. This documentation not only supports internal accountability but also satisfies external auditors or regulators reviewing the company's adherence to fund management protocols.

11. Contingency Planning for Exceptional Events:

Beyond routine management, Mill Interactive B.V. has contingency plans to address any unforeseen disruptions in fund transfer timing, such as unexpected processing delays with financial institutions. The company's ability to quickly reroute funds from alternate accounts or providers ensures that player withdrawals are not affected by external delays.

12. Operational Stability Without Compromising Player Fund Access:

While ensuring player access to funds, Mill Interactive B.V. also safeguards operational stability by carefully balancing the timing of transfers. With proactive liquidity management and internal control mechanisms, the company can meet player demands without risking operational cash flow or violating fund segregation policies.

Mill Interactive B.V. exhibits its dedication to preserving player liquidity and money segregation policy compliance by following a systematic procedure for prompt fund transfers. This proactive stance on timely transfers not only enhances player satisfaction but also reinforces the company's dedication to regulatory standards and best practices in financial management.

3.4 Additional Safeguards for Compliance

To strengthen its fund segregation policy and uphold regulatory standards, Mill Interactive B.V. has established additional safeguards that focus on authorization controls and meticulous reconciliation practices. These measures are integral to ensuring the security and integrity of player funds, preventing unauthorized access, and maintaining transparency with stakeholders. Below is a detailed explanation of these safeguards:

3.4.1 Dual Authorization for Fund Transfers

Mill Interactive B.V. requires a dual authorization protocol for all transactions involving player funds, adding a critical layer of security and control over fund transfers. This dual authorization includes the review and approval from both the Chief Financial Officer (CFO) and the Head of Compliance. This measure is implemented to minimize the risk of errors or unauthorized transactions, reinforcing the integrity of player funds and safeguarding the company's compliance commitments. Here's how dual authorization is structured and why it is essential:

- a) **Enhanced Security:** Dual authorization, which necessitates at least two sets of checks before any transfer of player funds can take place, lowers the possibility of fraudulent or incorrect transactions by demanding two separate permissions. This control helps ensure that only authorized transfers align with the company's strict segregation policies.
- b) **Accountability and Oversight:** Having both the CFO and Head of Compliance review each transaction establishes clear accountability, with two senior figures responsible for each transfer. This oversight ensures adherence to fund management policies and allows both the financial and compliance departments to monitor the purpose and legitimacy of every transaction.
- c) **Alignment with Regulatory Standards:** Dual authorization is a best practice often recommended by regulatory bodies to ensure financial transparency and security in high-stakes environments. For Mill Interactive B.V., this protocol reflects its commitment to following best practices in fund segregation, which is critical in the highly regulated gaming industry.
- d) **Operational Efficiency Without Compromising Security:** While dual authorization introduces additional steps, the process is streamlined to avoid delays in essential transfers, particularly those for player withdrawals. By maintaining a balance between efficiency and security, Mill Interactive B.V. can ensure that player funds are both protected and accessible as needed.

3.4.2 Daily and Monthly Reconciliation

Mill Interactive B.V. also enforces a rigorous reconciliation process to ensure continuous alignment between actual player fund balances and internal records. This process, which includes both daily and monthly reconciliations, helps the company promptly identify and address any discrepancies, further securing player funds and maintaining compliance with internal and regulatory standards. Here's a closer look at the reconciliation steps and their significance:

- i. **Daily Reconciliation:** Every day, the Finance Department performs a detailed review of all player accounts, cross-referencing balances with both internal records and actual account statements. This daily verification helps detect any issues immediately, such as discrepancies caused by system errors, unauthorized access, or misallocations. By catching and rectifying these issues early, Mill Interactive B.V. ensures the ongoing accuracy of its fund management.
- ii. **Monthly Reconciliation and Reporting:** At the end of each month, the Finance Department compiles a comprehensive reconciliation report detailing the player fund account balances, transfer records, and any adjustments made throughout the month. This report is reviewed by the Head of Finance and then submitted to senior management for oversight, ensuring high-level transparency and accountability. Monthly reconciliation also helps in long-term trend analysis, identifying patterns that might indicate inefficiencies or areas for improvement in the fund management process.
- iii. **Ensuring Compliance with Fund Segregation Policy:** By reconciling daily and monthly, Mill Interactive B.V. demonstrates its commitment to maintaining a clear distinction between player and operational funds. Regular reconciliation verifies that player funds are not inadvertently used for operational purposes, thereby ensuring compliance with the company's segregation policy.
- iv. **Audit Trail and Transparency:** Each reconciliation generates a thorough record that serves as an audit trail, providing clear evidence of fund management practices. These records allow internal and external auditors, as well as regulatory bodies, to verify compliance with fund segregation and financial reporting requirements. This level of transparency reassures stakeholders and regulators that Mill Interactive B.V. adheres to industry best practices.
- v. **Discrepancy Management:** If any discrepancies arise during reconciliations, the Finance Department immediately flags and investigates them, notifying the Head of Finance and Compliance Department as needed. Prompt resolution of discrepancies helps prevent small issues from escalating into larger financial mismanagement risks and reinforces the company's commitment to accurate, responsible fund management.
- vi. **Support for Financial Reporting and Compliance:** Reconciliation processes are critical for maintaining accurate records, which form the basis of the company's financial reporting and regulatory submissions. Mill Interactive B.V.'s approach ensures that all financial reports submitted to regulators or stakeholders are based on verified, reliable data, enhancing the company's reputation for transparency and compliance.

A strong reconciliation procedure and dual permission for financial transactions are two ways Mill Interactive B.V. maintains a high level of security and compliance. These extra precautions offer a thorough framework to preserve player cash, keep correct records, and guarantee that the business's financial procedures comply with legal requirements as well as internal standards.

3.5 Communicating Fund Transfer Policies to Players

Mill Interactive B.V. places a high priority on transparency and customer trust, especially when it comes to handling player funds. To achieve this, the company has developed a clear communication strategy to inform players about its fund transfer practices and segregation policies. By openly sharing its commitment to fund protection and responsible management, Mill Interactive B.V. reassures players that their funds are handled with integrity and in accordance with industry best practices. Here's a detailed look at the key elements and benefits of this communication approach:

3.5.1 Visibility on the Website

- **Dedicated Information Section:** Mill Interactive B.V. maintains a visible, easy-to-navigate section on its website dedicated to explaining fund segregation and transfer practices. This page is written in accessible language, ensuring that all players, regardless of their financial literacy, can understand the measures in place to protect their funds.
- **Key Policy Highlights:** The website section covers essential points such as the use of separate bank and crypto accounts for player funds, dual authorization requirements for fund transfers, daily and monthly reconciliations,

and emergency procedures in the event of increased withdrawal demands. This transparency gives players a clear view of the company's proactive steps to secure their deposits.

- **Accessible 24/7:** By making this information readily available online, Mill Interactive B.V. ensures that players can refer to these policies at any time, promoting an ongoing sense of security and openness.

3.5.2 Clear Terms and Conditions

- **Detailed Policy Inclusions:** The company's terms and conditions include explicit details about fund transfer policies, segregation of player funds, and security protocols. These terms clarify the distinctions between player and operational funds, reassuring players that their deposits are protected and accessible for withdrawals.
- **Consent at Registration:** New players are required to agree to the terms and conditions upon account creation. This step ensures that every player is informed of the company's commitment to fund safety and transfer protocols, establishing a foundation of trust from the start of the player relationship.
- **Regular Updates:** Any updates to the terms and conditions, particularly regarding fund segregation or transfer policies, are communicated promptly. This ensures that players remain informed of any changes, and their continued engagement reflects acknowledgment of the updated terms.

3.5.3 Inclusion in Player Agreements

- **Explicit Agreement Language:** Within player agreements, Mill Interactive B.V. reiterates the specifics of its fund transfer policies, emphasizing that player deposits, winnings, and bonuses are kept separate from operational accounts. This provision serves as an additional layer of communication, reinforcing the company's commitment to fund segregation.
- **Confirmation and Acknowledgment:** Player agreements often require players to acknowledge that they understand and accept these policies. This not only educates players on fund management practices but also increases their confidence in the company's commitment to best practices in fund safety.

3.5.4 Transparent Communication of Updates

- **Internal Messaging System:** Should there be any changes to fund protection or transfer policies, Mill Interactive B.V. will notify players directly via internal messaging on their accounts. This approach ensures that every player is promptly informed and has the chance to review any updates that may impact their experience.
- **Detailed Notifications:** Notifications about policy changes include explanations for why adjustments were made, along with assurances that these changes continue to prioritize player fund security. By offering context, the company builds trust and encourages player understanding of its decision-making process.
- **Player Acknowledgment:** In certain cases, players may be required to acknowledge these changes before proceeding with deposits or withdrawals, ensuring that all players are aware of and agree to any new terms.

3.5.5 Benefits of Transparent Communication

- **Building Trust and Loyalty:** Transparency about fund transfer policies helps to establish trust with players. Knowing that Mill Interactive B.V. follows a strict policy of fund segregation and has robust protections in place reassures players, making them more likely to continue using the platform.
- **Enhanced Player Confidence:** Clear, accessible communication about fund handling practices boosts players' confidence in the platform's reliability. This transparency can set Mill Interactive B.V. apart from competitors, as players may prioritize platforms that are open about their financial practices.
- **Supporting Compliance and Reputation:** By maintaining clear records of communications about fund policies, Mill Interactive B.V. can demonstrate its commitment to regulatory compliance. This documentation shows regulators that the company not only implements strong financial practices but also takes steps to inform and protect players.

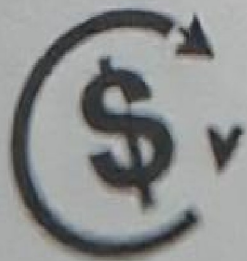
3.5.6 Ongoing Educational EDorts

- **Information Through FAQs:** The company's FAQ section includes questions related to fund transfers, withdrawals, and fund security, making it easier for players to find quick answers to common concerns.
- **Support for Player Inquiries:** Customer support representatives are trained to answer questions about fund segregation and transfer policies, providing players with personalized assistance if they have further questions. This proactive approach ensures players receive accurate, consistent information.

Through these communication methods, Mill Interactive B.V. establishes a strong foundation of trust and transparency, allowing players to feel secure in their decision to use the platform. By being open about its fund transfer and segregation practices, the company not only strengthens player relationships but also demonstrates its commitment to financial responsibility and regulatory compliance.

Mill Interactive B.V. has established a strong and compliant fund transfer process that prioritizes the security and integrity of player funds. By using secure transfer methods and working with trusted financial institutions, the company ensures that all transactions are protected from unauthorized access. Each transfer is meticulously documented, creating a clear audit trail that supports transparency and accountability. Timely transfers are also prioritized to maintain liquidity for player withdrawals, guaranteeing fund accessibility when needed. Additional controls, such as dual authorization and daily reconciliations, further enhance the process by preventing unauthorized transactions and ensuring alignment with segregation policies. Altogether, these measures strengthen the company's commitment to fund protection and regulatory compliance, oSering players confidence in the safety of their funds.

Financial Controls



4. Financial Controls

Mill Interactive B.V. has established comprehensive financial controls to safeguard the security and integrity of player funds, ensuring full compliance with fund segregation policies. These controls include regular reconciliation processes to maintain accurate records and address discrepancies promptly. Daily reconciliations are conducted by the finance team to verify alignment between player account balances and transaction records, while monthly reviews are overseen by senior management to ensure regulatory and policy compliance.

The company implements stringent internal controls to restrict access to player fund accounts. Access is limited to the finance department, and all transactions involving player funds require dual authorization from the Chief Financial Officer (CFO) and the Head of Compliance. This dual-control system ensures transparency and prevents unauthorized access or misuse.

To enhance accountability, independent external audits are conducted periodically. These audits verify that player funds are fully segregated and that financial controls align with regulatory standards. Additionally, Mill Interactive B.V. maintains liquidity thresholds in player fund accounts, retaining a reserve to meet withdrawal demands and mitigate the risk of shortfalls.

4.1 Reconciliation Processes of player funds

Mill Interactive B.V. prioritizes the accurate management and safeguarding of player funds by implementing thorough and structured reconciliation processes. These measures are essential to maintaining transparency, ensuring compliance, and addressing any discrepancies in fund management. The reconciliation processes include daily and monthly reviews to align player fund accounts with the company's internal records and liabilities.

4.1.1 Daily Reconciliations

The finance team conducts daily reconciliations to compare the balances of player fund accounts with transaction records, including deposits, withdrawals, and other player-related activities. This meticulous process ensures that:

- All transactions are accurately recorded.
- Any discrepancies are identified and addressed immediately to maintain the integrity of the accounts.
- Logs of reconciliations and corrective actions are kept, providing a clear audit trail for future reference.

Daily reconciliations are a critical step in ensuring the accuracy of real-time data, minimizing errors, and maintaining player confidence in the company's financial practices.

4.1.2 Monthly Reviews

At the end of each month, the finance team prepares a comprehensive reconciliation report. This report includes:

- A detailed comparison of player fund account balances with recorded liabilities.
- An analysis of any anomalies or irregularities found during daily reconciliations.
- Documentation of any adjustments made during the month.

The Head of Finance reviews this report to ensure compliance with internal policies and external regulatory standards. After approval, the report is submitted to senior management, providing an additional layer of oversight and accountability.

4.1.3 Liabilities Alignment

As part of the monthly reconciliation process, player fund account balances are analyzed to ensure they adequately cover both current liabilities (such as withdrawal requests) and anticipated future liabilities. This proactive approach ensures that:

- Sufficient funds are always available to meet player demands.

- The company remains compliant with fund segregation requirements, avoiding regulatory breaches.

4.2 Internal Controls

Mill Interactive B.V. employs rigorous internal controls to protect player funds from unauthorized access or misuse, reinforcing trust and regulatory compliance. These controls ensure secure management of player fund accounts through a combination of restricted access, dual authorization protocols, and robust reporting mechanisms.

4.2.1 Restricted Access

Access to player fund accounts is strictly limited to authorized personnel within the finance department. This ensures:

- Only trained and responsible individuals handle player fund transactions.
- Transactions are limited to legitimate activities such as player payouts, preventing misuse of funds.
- Operational and administrative expenses are completely segregated from player fund accounts, ensuring compliance with fund segregation policies.

This measure minimizes the risk of fraud or errors by restricting account access to a controlled group of professionals.

4.2.2 Dual Authorization

To enhance security, all transactions from player fund accounts require dual authorization from:

1. The Chief Financial Officer (CFO): Ensures the financial integrity of transactions.
2. The Head of Compliance: Verifies that all transactions align with regulatory standards and internal policies.

This dual-signature process:

- Eliminates the risk of unauthorized transactions by requiring the agreement of two senior officials.
- Creates a clear accountability trail, ensuring that every transaction is deliberate and well-documented.
- Prevents a single point of failure in the system, reducing the likelihood of errors or fraudulent activity.

4.2.3 Material Change Reporting

Mill Interactive B.V. maintains a strict protocol for reporting and resolving any material changes or discrepancies in fund arrangements:

- **Immediate Reporting:** Any issues identified during reconciliation or daily operations are promptly reported to the Head of Finance and the Compliance Department.
- **Resolution Protocols:** Reported discrepancies are investigated thoroughly, and corrective actions are implemented to ensure the accuracy and security of player funds.
- **Documentation:** All material changes and resolutions are documented for transparency and future audit purposes.

This proactive approach ensures any potential risks to player funds are swiftly identified and addressed, maintaining the company's commitment to operational integrity and regulatory compliance.

4.2.4 Benefits of Internal Controls

By implementing these robust internal controls, Mill Interactive B.V.:

- Protects player funds from unauthorized or improper use.
- Maintains the accuracy of financial records, ensuring clear segregation of funds.
- Demonstrates a strong commitment to regulatory requirements and the highest standards of financial management.

These measures collectively safeguard player trust and reinforce the company's reputation as a reliable and compliant operator in the gaming industry.

4.3 External Audits

To uphold financial integrity, ensure compliance with regulations, and maintain transparency, Mill Interactive B.V. engages independent, qualified auditors to perform periodic external reviews of its financial systems and player fund accounts. These audits are a cornerstone of the company's fund management policy, providing an additional layer of oversight beyond internal controls.

4.3.1 Purpose of External Audits

1. **Verification of Compliance:** External auditors verify that Mill Interactive B.V. adheres to its fund segregation policies and complies with regulatory requirements, such as those stipulated by the Curacao Gaming Control Board.
2. **Transparency:** The audits provide an objective assessment of the company's financial practices, reassuring stakeholders, including players and regulators, that their funds are secure and managed responsibly.
3. **Accountability:** By subjecting its processes to third-party scrutiny, Mill Interactive B.V. demonstrates a commitment to accountability and ethical financial management.

4.3.2 Scope of External Audits

The external audits focus on key aspects of fund management, including:

1. **Segregation of Funds:** Auditors review financial records to confirm that player funds are maintained in dedicated accounts, separate from operational accounts. This includes evaluating:
 - i. Bank and cryptocurrency account balances.
 - ii. Evidence of exclusive use of player fund accounts for deposits and withdrawals.
2. **Reconciliation Accuracy:** Auditors validate the accuracy of internal reconciliation processes by comparing:
 - i. Daily and monthly reconciliation logs.
 - ii. Transaction records against account balances.
3. **Regulatory Adherence:** The audit assesses compliance with both internal policies and external regulations, ensuring:
 - i. Proper labelling and documentation of accounts.
 - ii. Adequate liquidity in player fund accounts to meet liabilities.

4.3.3 Audit Process

1. **Independent Selection of Auditors:** Mill Interactive B.V. appoints external auditors with recognized qualifications and expertise in financial audits within the gaming industry.
2. **Comprehensive Review:** The auditors examine financial records, transaction logs, reconciliation reports, and fund management practices.
3. **Audit Report Generation:** After completing the review, the auditors prepare a detailed report outlining:
 - i. Findings regarding compliance with segregation policies.
 - ii. Recommendations for improvements, if any.
4. **Submission and Review:** The audit report is submitted to senior management and, where required, to regulatory authorities.

4.3.4 Benefits of External Audits

1. **Enhanced Credibility:** Regular third-party reviews build trust among stakeholders by demonstrating Mill Interactive B.V.'s commitment to financial transparency and ethical practices.
2. **Improved Processes:** Audit recommendations help identify areas for improvement, strengthening the company's internal controls and financial systems.
3. **Regulatory Confidence:** By proactively undergoing external audits, Mill Interactive B.V. reassures regulators that it is meeting its obligations to protect player funds.

4.3.5 Frequency of Audits

Mill Interactive B.V. conducts these audits on a quarterly basis, ensuring continuous oversight and prompt identification of any discrepancies or risks. Through its external audit framework, Mill Interactive B.V. solidifies its position as a responsible operator in the gaming industry, prioritizing the protection and transparency of player funds.

Mill Interactive B.V. has developed a comprehensive framework of financial controls to ensure the security, integrity, and proper management of player funds. This framework encompasses daily and monthly reconciliation processes, rigorous internal controls, and regular external audits. Reconciliations verify alignment between player fund accounts and liabilities, addressing discrepancies promptly and maintaining accurate records. Internal controls, such as restricted access and dual authorization protocols, safeguard funds from unauthorized transactions, while material changes are immediately reported and resolved.

To further ensure compliance and transparency, Mill Interactive B.V. engages independent auditors for quarterly reviews, confirming adherence to fund segregation policies and regulatory requirements. These audits validate reconciliation processes, segregation of funds, and liquidity thresholds to meet player liabilities. By combining robust internal procedures with third-party scrutiny, Mill Interactive B.V. demonstrates its commitment to protecting player funds, upholding regulatory standards, and fostering trust among players, stakeholders, and regulators.



RISK Management

5. Risk Management

Mill Interactive B.V. ensures the security of player funds through a robust risk management framework that identifies and mitigates key threats. These include cyberattacks, operational failures, insolvency, money laundering, and terrorist financing. The company implements proactive measures such as advanced cybersecurity, a business continuity plan, and strict AML/KYC procedures. By maintaining segregated accounts and liquidity reserves, Mill Interactive B.V. safeguards funds even during disruptions. This approach reflects its commitment to trust, transparency, and regulatory compliance.

5.1 Identified Risks to Player Funds

The following are the different types of risks identified for player funds:

5.1.1 Cyberattacks

Cyberattacks are a major threat to financial systems, particularly in online gaming and financial platforms. Threats such as hacking, phishing, and malware can lead to unauthorized access to sensitive player data and financial accounts. Cybercriminals may target vulnerabilities in the system to steal personal information, withdraw funds, or manipulate account balances. This risk can lead to substantial financial losses, damage to the platform's reputation, and legal repercussions. Mill Interactive B.V. takes significant measures to protect its financial systems through robust cybersecurity protocols, including encryption, multi-factor authentication, and regular security audits.

5.1.2 Operational Failures

Operational failures encompass a range of potential disruptions, including system downtime, technical malfunctions, and human errors, all of which can jeopardize the security of player funds. For instance, a system failure could prevent withdrawals from being processed, or technical malfunctions could lead to incorrect account balances, disrupting the company's ability to maintain accurate financial records. Human error, such as mismanagement of player accounts, could also expose the company to significant risks. To mitigate this, Mill Interactive B.V. implements redundancy systems, regular technical checks, and staff training to reduce the likelihood of operational failures and ensure the continuity of services.

5.1.3 Insolvency

Insolvency presents a critical risk to the security of player funds. If the company faces financial distress or bankruptcy, there is a potential that player liabilities may not be honoured. Mill Interactive B.V. addresses this risk by maintaining sufficient liquidity and segregating player funds from operational accounts. The company ensures that player funds are held in accounts that are protected from any insolvency claims. Additionally, Mill Interactive B.V. follows strict accounting practices and ensures that player funds are prioritized in the event of financial difficulties, reducing the risk of players losing access to their funds.

5.1.4 Money Laundering (ML)

Money laundering poses a significant risk in industries dealing with large amounts of financial transactions, including online gaming. Criminals may attempt to use the platform to launder illicit funds by depositing large sums of money and withdrawing it in a way that obscures the illicit origin. Mill Interactive B.V. has robust Anti-Money Laundering (AML) procedures in place to prevent such activities. This includes implementing Know Your Customer (KYC) verification processes, monitoring for suspicious transactions, and reporting any irregularities to the relevant authorities. These efforts help to ensure that the platform is not exploited for illegal financial activity.

5.1.5 Terrorist Financing (TF)

Terrorist financing is another serious risk in which funds may be directed toward supporting unlawful activities, including terrorism. Mill Interactive B.V. must be vigilant in detecting and preventing any attempt to misuse the platform for terrorist financing. This can include monitoring deposits and withdrawals for unusual patterns or transactions linked to high-risk jurisdictions. The company follows strict compliance with regulatory requirements to detect and report any potential links to terrorism, working closely with regulators and law enforcement agencies. By adhering to these standards, Mill

Interactive B.V. ensures that its platform is not used for unlawful purposes, helping to maintain its reputation and trustworthiness.

5.2 Risk Mitigation Strategies

The following are the different types of risk mitigation strategies employed by Mill Interactive B.V. to protect player funds from various potential threats:

5.2.1 Cybersecurity Measures

Mill Interactive B.V. takes a proactive approach to safeguarding player funds and sensitive data from various cyber threats, including hacking, phishing, and malware. To protect its financial systems, the company employs advanced security measures such as firewalls, intrusion detection systems, and end-to-end encryption. These measures help to ensure that unauthorized access to player accounts and transaction details is prevented. Regular penetration testing and vulnerability assessments are conducted to identify potential security gaps and address them before they can be exploited by malicious actors. Additionally, staff are continuously trained on cybersecurity best practices to reduce risks related to phishing and inadvertent system breaches, ensuring that all employees are equipped to recognize and respond to potential security threats.

5.2.2 Business Continuity Plan (BCP)

In the event of unforeseen disruptions, Mill Interactive B.V. has developed a comprehensive Business Continuity Plan (BCP) to ensure the protection of player funds and the continued operation of the platform. Critical systems are backed up to prevent any downtime or loss of data in case of system failures. This redundancy ensures that, even if one system malfunctions, another can take over without affecting operations. The BCP also includes clear crisis management procedures that outline actions to safeguard player funds during emergencies, enabling uninterrupted access to player accounts. Recovery protocols are in place to quickly restore services in the event of operational failures, minimizing the impact on player funds and financial security, and ensuring that players can continue to access their accounts without delays or issues.

5.2.3 Insolvency Preparedness

In the event of insolvency or financial distress, Mill Interactive B.V. ensures that player funds are protected and prioritized over other operational liabilities. Player funds are segregated from the company's operational funds, meaning they are held in separate accounts that are unaffected by the company's financial situation. Additionally, the company maintains liquidity reserves by retaining 10% of monthly revenue in player accounts, which provides a buffer to process withdrawals even during periods of financial strain. In the case of insolvency, player liabilities are given priority, ensuring that player funds are fully paid out before any other financial obligations are addressed. This ensures that players' funds are secure, even in the worst-case scenario of financial distress.

5.2.4 AML/KYC Procedures

Mill Interactive B.V. follows a stringent Anti-Money Laundering (AML) and Know Your Customer (KYC) program to identify and prevent illicit activities such as money laundering. As part of the registration process, players undergo comprehensive KYC checks to verify their identities, helping to reduce the risk of anonymous accounts being used for fraudulent activities. The finance and compliance teams continuously monitor all player transactions to detect suspicious patterns or behaviors that could indicate money laundering. Any suspicious activities are promptly reported to the relevant financial intelligence units (FIUs) through Suspicious Activity Reports (SARs). This helps Mill Interactive B.V. maintain compliance with global anti-money laundering laws and ensure that the platform is not exploited for illegal financial transactions.

5.2.5 Terrorist Financing Controls

To mitigate the risk of terrorist financing, Mill Interactive B.V. implements enhanced due diligence and geographic risk assessments. Transactions originating from high-risk jurisdictions, as defined by the Financial Action Task Force (FATF), undergo additional scrutiny to ensure that no illicit funds are being channelled through the platform for unlawful purposes. Enhanced Due Diligence (EDD) is applied to transactions involving high-risk sources, where more in-depth checks are performed to detect potential links to terrorist financing. Mill Interactive B.V. also identifies transactions from

high-risk regions and flags them for further investigation, ensuring that it complies with FATF guidelines and international standards for preventing terrorist financing. This comprehensive approach helps to safeguard the platform from being misused for illicit financial activities and ensures that it operates within the bounds of global regulatory expectations.

Through its comprehensive risk mitigation strategies, Mill Interactive B.V. demonstrates a strong commitment to safeguarding player funds and ensuring the integrity of its financial systems. The company proactively addresses various risks that could potentially threaten player funds, including cybersecurity breaches, operational disruptions, insolvency, and financial crimes such as money laundering and terrorist financing. By implementing advanced cybersecurity measures, maintaining a robust Business Continuity Plan, prioritizing player liabilities in the event of insolvency, and adhering to strict AML/KYC protocols, Mill Interactive B.V. mitigates these risks effectively.

These strategies not only ensure the safety of player funds but also help the company maintain compliance with regulatory standards, fostering trust with players, regulators, and stakeholders. The company's focus on cybersecurity, operational resilience, and financial crime prevention enhances its reputation as a secure platform, where players can feel confident that their funds are protected. By continuously monitoring, assessing, and improving these risk management practices, Mill Interactive B.V. guarantees the uninterrupted protection of customer funds, providing peace of mind and promoting long-term customer loyalty.

Regulatory Compliance

6. Regulatory compliance

Regulatory compliance is an essential component of Mill Interactive B.V.'s approach to player fund segregation. It ensures that the company follows all applicable laws, regulations, and industry standards, specifically those set by the Curacao Gaming Control Board (GCB), which oversees its gaming operations. By adhering to these requirements, Mill Interactive B.V. safeguards the integrity of its financial practices and ensures that player funds are securely segregated, preventing misuse and enhancing trust among players and regulators.

6.1 Staying Updated on Regulatory Changes

Staying Updated on Regulatory Changes is a critical aspect of Mill Interactive B.V.'s commitment to regulatory compliance, ensuring that the company remains aligned with the latest laws and regulations governing player fund segregation and online gaming. The regulatory landscape for online gambling is continuously evolving, with frequent updates to legal frameworks at both the national and international levels. To avoid risks associated with non-compliance, it is essential for Mill Interactive B.V. to be proactive in staying informed about these regulatory changes.

6.2 Monitoring Regulatory Developments

Mill Interactive B.V. employs a comprehensive system for monitoring regulatory developments within its operating jurisdictions, which include Curacao (under the Curacao Gaming Control Board or GCB) and other regions where the company may have a presence or serve players. This involves closely following announcements from regulatory bodies such as the GCB, as well as global organizations that set industry standards, like the Financial Action Task Force (FATF) or the European Union. The company also keeps track of legislative changes in other jurisdictions where online gambling laws may affect its operations, even if Mill Interactive B.V. does not directly operate in those areas.

6.3 Addressing Changes to Online Gambling Laws

The regulatory requirements related to online gambling can change due to new government policies, international treaties, technological advancements, or even emerging issues in the industry, such as concerns over responsible gaming or fraud prevention. This evolving environment means that Mill Interactive B.V. must be agile in its approach to regulatory compliance. The company actively engages in understanding and interpreting legal updates and amendments as they arise. For example, if a new regulation mandates additional protections for player funds or requires more stringent segregation practices, Mill Interactive B.V. ensures it adjusts its procedures accordingly.

The company achieves this by subscribing to industry news feeds, attending relevant webinars and conferences, and participating in industry associations. These sources provide valuable insights into upcoming changes and offer a forum for dialogue with legal experts, consultants, and peers in the industry. Additionally, Mill Interactive B.V. maintains a dedicated compliance team that closely monitors all regulatory changes and assesses their potential impact on operations.

6.4 Proactive Adjustment of Policies and Procedures

Mill Interactive B.V. does not wait for audits or external inspections to identify the need for policy updates; instead, it actively adjusts its internal practices in response to regulatory changes. When a new law or regulation is introduced, the company conducts internal reviews and updates its policies, procedures, and systems to ensure compliance. This may involve changes to the company's player fund segregation practices, adjustments in reporting requirements, or updating compliance training programs for employees.

For instance, if a new regulation requires the company to segregate player funds into more specific categories or introduces stricter reconciliation processes, Mill Interactive B.V. would promptly implement these changes across all relevant platforms and financial systems. Furthermore, the company ensures that staff members, especially those in compliance, finance, and operational roles, are updated on the latest regulations and trained to handle the changes effectively.

6.5 Mitigating Non-Compliance Risks

By staying updated on regulatory changes, Mill Interactive B.V. reduces the risk of non-compliance, which could result in penalties, legal consequences, or damage to its reputation. Non-compliance can occur if a company fails to update its practices in line with regulatory changes, which can expose the company to operational risks, financial penalties, or even license revocation. Regularly updating its procedures ensures that Mill Interactive B.V. remains in good standing with regulatory authorities and avoids such risks.

In addition, by promptly addressing regulatory changes, the company enhances its ability to safeguard player funds, which is a key concern of regulators. Whether it's ensuring that player funds remain segregated in secure accounts or implementing new protocols to protect against fraud, compliance with regulatory requirements helps the company protect both its business and its customers.

6.6 Meeting Licensing Requirements of the GCB

Mill Interactive B.V. operates under the regulations set forth by the Curacao Gaming Control Board (GCB), a highly respected regulatory authority in the online gaming industry. The GCB imposes a range of requirements to ensure that online gambling platforms operate with fairness, security, and transparency. One of the core areas that the GCB focuses on is the segregation of player funds, which ensures that player deposits are kept separate from the company's operational funds. Mill Interactive B.V. takes these obligations seriously and has implemented comprehensive measures to ensure compliance with these stringent regulations, further promoting the security and integrity of its operations.

6.6.1 Separation of Player Funds from Operational Funds

One of the fundamental licensing requirements of the GCB is that player funds must be segregated from the company's operational funds. This means that any funds deposited by players for wagering or withdrawal purposes must be kept in dedicated accounts that are separate from the company's own operational accounts. Mill Interactive B.V. ensures this separation by maintaining distinct bank accounts for player deposits and withdrawals, which are completely separate from the accounts used for day-to-day business expenses, including payments to software providers or operational overhead.

This segregation of funds not only meets the legal requirements set by the GCB but also offers additional protection to players. In the event of any financial instability or insolvency, the company's operational funds cannot be used to settle player liabilities. This separation guarantees that player funds remain secure and protected, reinforcing the company's commitment to player safety and financial transparency.

6.6.2 Secure Accounts for Player Funds

To further enhance the protection of player funds, Mill Interactive B.V. ensures that these funds are held in secure accounts with reputable financial institutions. The company's player accounts are designed to ensure accessibility and security, with regular oversight to verify that these accounts are appropriately managed. Additionally, Mill Interactive B.V. maintains a system of regular reconciliations to ensure that the funds in these accounts always align with the company's internal records. This reconciliation process is conducted both daily and monthly, and discrepancies are immediately addressed to prevent any potential issues.

6.6.3 Liquidity Management

In addition to the physical separation of funds, the GCB's licensing conditions require that online gaming operators maintain sufficient liquidity to meet player withdrawals at any given time. Mill Interactive B.V. ensures that it holds an appropriate balance in its player accounts to cover all player withdrawals. The company also retains liquidity reserves, such as 10% of its monthly revenue, specifically in the player accounts, to ensure that player payouts are never delayed or compromised. This strategy ensures that there are always sufficient funds to cover player liabilities, even during periods of increased withdrawal activity or financial strain.

6.6.4 Regular Financial Reporting

The GCB mandates specific financial reporting obligations to ensure that operators remain compliant with licensing conditions. These reports typically involve detailed financial statements, including documentation of the balance and

movement of player funds. Mill Interactive B.V. diligently complies with these requirements by submitting regular reports, which include evidence of its proper segregation of player funds, sufficient liquidity, and other financial matters. These reports are reviewed by the GCB to ensure that the company is meeting its obligations and operating in a responsible manner.

6.6.5 Reinforcing Trust and Compliance

By strictly adhering to the GCB's licensing requirements, Mill Interactive B.V. demonstrates a clear commitment to regulatory compliance and reinforces the trust of both its players and regulators. The company's focus on maintaining secure and segregated player accounts, conducting regular reconciliations, and ensuring liquidity underscores its dedication to player protection. Compliance with the GCB's licensing conditions also assures regulators that Mill Interactive B.V. is operating in a transparent and responsible manner, upholding high standards of financial integrity and operational security.

In doing so, Mill Interactive B.V. not only meets the legal and regulatory expectations set by the GCB but also creates a secure, trustworthy environment for its players. This commitment to regulatory compliance plays a key role in the company's long-term success, fostering positive relationships with regulators, players, and business partners alike.

6.7 Conducting Regular Reviews to Ensure Ongoing Compliance

Mill Interactive B.V. fully acknowledges the dynamic nature of the regulatory environment in which it operates, especially within the online gaming industry. Regulatory requirements related to player fund segregation are constantly evolving, and the company understands that continuous compliance is critical to maintaining both legal standing and player trust. As part of its ongoing commitment to regulatory compliance, Mill Interactive B.V. conducts regular reviews and assessments of its policies and procedures. These internal audits help the company ensure that its practices align with the most current legal and regulatory requirements, enabling it to stay ahead of potential compliance risks.

6.7.1 Internal Audits and Reviews

Regular internal audits are a central component of Mill Interactive B.V.'s compliance framework. These audits are designed to evaluate whether the company is correctly implementing and following its player fund segregation policy, including maintaining proper separation of funds and ensuring that sufficient liquidity is available to meet player liabilities. The audit team scrutinizes the company's operational and financial practices, checking for alignment with regulatory standards and identifying any areas of potential risk or non-compliance.

In addition to these formal audits, the company conducts comprehensive reviews of its internal systems, processes, and controls. These reviews are a proactive measure to ensure that policies and practices continue to reflect the latest regulatory developments, as well as any changes in the company's business operations. Any discrepancies or issues identified during these reviews are promptly addressed to prevent compliance gaps.

6.7.2 Identifying Gaps and Areas for Improvement

The primary goal of Mill Interactive B.V.'s regular reviews is to identify any discrepancies or gaps in its processes, as well as areas where its current policies may be insufficient in addressing emerging regulatory requirements. For example, if a new regulation is introduced that imposes stricter player fund protection measures, the company's review process allows it to swiftly update its policies and procedures to meet these new requirements. This ensures that the company is always operating in full compliance with applicable laws, helping to mitigate the risk of regulatory penalties or reputational damage.

The reviews also enable the company to identify areas where efficiencies can be improved or where additional internal controls may be necessary to enhance security, improve transparency, or address potential vulnerabilities. By regularly assessing and refining its processes, Mill Interactive B.V. remains agile and prepared to respond to any changes in the regulatory landscape, maintaining a state of readiness for any future compliance challenges.

6.7.3 Preparing for Future Compliance Challenges

Mill Interactive B.V.'s commitment to **continuous compliance** is not just about responding to regulatory changes as they occur, but also about anticipating potential future challenges. By conducting regular internal reviews and

maintaining an active awareness of the regulatory landscape, the company ensures that it is always prepared for any changes that may arise in the future. This proactive approach reduces the risk of non-compliance and strengthens the company's ability to operate eSectively within the legal framework, regardless of how regulations evolve.

6.8 Continuous Commitment to Compliance and Trust

Mill Interactive B.V. demonstrates an unwavering commitment to compliance and the safeguarding of player funds through a multifaceted approach that incorporates regulatory awareness, adherence to licensing requirements, and regular internal assessments. This ongoing commitment not only ensures that the company meets its obligations in terms of player fund segregation, but it also strengthens its reputation as a trustworthy, responsible operator within the highly competitive iGaming industry.

6.8.1 Staying Updated on Regulatory Changes

One of the cornerstones of Mill Interactive B.V.'s compliance strategy is its proactive monitoring of regulatory changes. In the constantly evolving landscape of online gaming and financial regulation, staying informed about updates to laws and industry standards is crucial. The company tracks regulatory changes within its operating jurisdiction, as well as globally, ensuring that its policies and practices are always aligned with the latest legal requirements. This ongoing vigilance enables Mill Interactive B.V. to adjust its operations and policies in a timely manner, ensuring that player funds are always managed in accordance with current laws, thus reducing the risk of non-compliance or penalties.

6.8.2 Adhering to Licensing Requirements

Mill Interactive B.V. operates under the jurisdiction of the Curacao Gaming Control Board (GCB), which imposes stringent licensing requirements on companies operating in the online gaming sector. The company strictly adheres to these licensing conditions, including maintaining a clear separation between player funds and operational funds. By following these regulations, Mill Interactive B.V. not only ensures legal compliance but also upholds industry standards related to financial security, protecting player assets against potential operational risks such as insolvency or fraud. The company's commitment to these requirements reinforces its role as a responsible operator, fostering confidence among regulators and players alike.

6.8.3 Conducting Regular Policy Reviews

To ensure ongoing compliance, Mill Interactive B.V. conducts regular reviews and assessments of its internal policies and procedures. These reviews are crucial in identifying any discrepancies, gaps, or areas where the company's practices may fall short of evolving regulatory requirements. For example, if new regulations impose stricter measures on fund segregation or player fund protection, Mill Interactive B.V. can quickly adapt its operations to comply with these changes. By regularly reviewing its policies, the company demonstrates a commitment to continuous improvement and accountability, ensuring that it remains at the forefront of industry standards.

6.8.4 Strengthening Transparency and Accountability

The company's continuous commitment to compliance directly contributes to transparency in its operations. By consistently aligning its practices with regulatory expectations, Mill Interactive B.V. builds trust with its stakeholders, including regulators, players, and financial institutions. Transparency in player fund management and segregation not only assures players that their funds are secure, but also fosters a sense of accountability within the company. This open approach reduces the risk of any discrepancies or regulatory issues, further solidifying Mill Interactive B.V.'s reputation as a reliable and compliant operator in the iGaming space.

6.8.5 Fostering Trust with Stakeholders

At the heart of Mill Interactive B.V.'s compliance strategy is the understanding that trust is the foundation of all successful relationships within the gaming industry. For players, knowing that their funds are protected and that the company adheres to regulatory standards builds confidence in using the platform. For regulators, the company's adherence to the relevant gaming laws and financial regulations demonstrates a commitment to upholding industry standards. Finally, for financial institutions, transparent and accountable management of player funds and adherence to anti-money laundering (AML) practices reduces the risk of financial crimes and fosters positive business relationships.

6.8.6 Ensuring Long-Term Success

The importance of compliance extends beyond legal obligations—it plays a crucial role in ensuring the long-term success of Mill Interactive B.V. in the competitive iGaming industry. By prioritizing regulatory compliance and player fund protection, the company not only meets the immediate needs of regulators and players, but also positions itself for sustainable growth. Trust, transparency, and accountability are the cornerstones of long-term business relationships, ensuring that Mill Interactive B.V. remains a reputable and resilient operator in a rapidly changing market. Moreover, by being proactive in adapting to regulatory changes and continuously reviewing its practices, the company can avoid the risks of falling behind on legal requirements, which could otherwise lead to operational disruptions, reputational damage, or regulatory sanctions.

Ultimately, by demonstrating its commitment to regulatory compliance, Mill Interactive B.V. reassures both its players and regulatory bodies that it is dedicated to maintaining a secure, transparent, and legally compliant environment for managing player funds. This enhances the company's credibility and promotes sustainable business practices that align with industry standards.

Dispute Resolution

7. Dispute Resolution

Mill Interactive B.V. takes the protection of player funds and the maintenance of strong customer relationships very seriously. To ensure that players can resolve any concerns or issues related to their funds, the company has established a clear and structured dispute resolution process. This process is designed to be transparent, fair, and efficient, providing players with confidence that their concerns will be addressed promptly. The company's approach focuses on three key pillars:

7.1 Clear and Accessible Complaint Process for Players:

Mill Interactive B.V. recognizes that, in the course of interacting with players, disputes or concerns may arise regarding player funds. These could relate to various issues such as withdrawal delays, discrepancies in account balances, or other financial transactions. Understanding that such issues need to be addressed promptly and fairly, the company has put in place a clear and accessible complaint process that players can use to voice their concerns. This process is essential in fostering transparency and trust, and it demonstrates Mill Interactive B.V.'s commitment to providing a customer-centric experience.

7.1.1 Simple and Clear Channels for Reporting Complaints

Mill Interactive B.V. understands that players should not be burdened with complicated procedures when they encounter problems with their accounts or funds. To ensure that the complaint process is accessible to everyone, the company has created easy-to-use channels through which players can report their concerns. This may include dedicated email addresses for complaints, an online form on the website, or even a customer support helpline that players can call directly. These communication channels are specifically set up to handle issues related to player funds, ensuring that the concerns are directed to the right team for swift action.

By providing multiple channels for communication, Mill Interactive B.V. ensures that players are not limited to just one method of contact, offering flexibility in how complaints can be submitted. Whether a player prefers email, an online submission form, or direct phone support, they can easily reach out and explain their concerns without facing unnecessary barriers.

7.1.2 Straightforward Process for Resolving Disputes

The complaint process itself is designed to be as straightforward and user-friendly as possible. Mill Interactive B.V. ensures that players are not overwhelmed by bureaucracy or technical jargon. When a player submits a complaint, the process typically involves simple steps where the player describes the nature of their issue, provides relevant documentation (such as transaction IDs, screenshots, or communications), and submits the complaint via one of the available channels.

The ease of this process is important for ensuring that players don't face delays or complications when raising their concerns. By removing unnecessary steps or complexity, Mill Interactive B.V. helps players feel confident that their issue will be addressed without frustration.

7.1.3 Ensuring Accessibility and Prompt Action

Accessibility is a core component of this process. Mill Interactive B.V. ensures that players can easily reach out at any time, regardless of their location or preferred method of communication. The complaint channels are available across different platforms, and the company strives to provide multilingual support when necessary, ensuring inclusivity and ease of use for players from different regions.

Once a complaint is submitted, the company ensures that the issue is passed on to the appropriate team for investigation. Acknowledging the complaint promptly and outlining next steps helps establish trust and confidence in the process. Mill Interactive B.V. also sets clear expectations for response times and communicates regularly with players regarding the status of their complaint.

7.1.4 Improving Customer Experience and Building Trust

The clear and accessible complaint process plays a pivotal role in enhancing the customer experience. By ensuring that players have a simple and effective way to express their grievances, Mill Interactive B.V. helps reduce player frustration.

This open approach fosters a sense of trust between the company and its players, as customers feel assured that their concerns will be heard and dealt with fairly.

The transparency of the process also contributes to the company's reputation as a reliable and responsible operator. Players are more likely to feel valued and supported when they know that they can easily raise issues and expect a timely resolution. This positive experience can lead to long-term customer loyalty, as players are reassured that their funds and concerns are being handled with professionalism and care.

Mill Interactive B.V. has designed a clear and accessible complaint process to ensure that players can easily report any issues related to their funds, whether it's regarding withdrawals, deposits, or account balances. By providing simple and effective communication channels, making the process straightforward, and ensuring accessibility and prompt action, the company demonstrates its commitment to customer satisfaction. This approach not only helps to resolve disputes quickly but also fosters trust, transparency, and a positive player experience, reinforcing Mill Interactive B.V.'s reputation as a fair and responsible operator in the online gaming industry.

7.2 A Dedicated Team to Investigate and Resolve Disputes Promptly and Fairly

To ensure disputes related to player funds are handled efficiently and impartially, Mill Interactive B.V. has established a dedicated team responsible for investigating and resolving such complaints. This specialized team is composed of professionals with expertise in key areas such as customer service, compliance, and financial operations. These individuals are trained to assess disputes with a deep understanding of both the company's internal policies and external regulatory requirements. This ensures that complaints are handled by knowledgeable staff capable of making informed and fair decisions.

The investigation process is conducted promptly to minimize any delays in resolving issues. The team follows a structured process, starting by gathering all relevant details related to the dispute. This includes reviewing transaction logs, player account details, and previous communication records to get a complete understanding of the situation. By doing so, the team can assess the facts impartially and make decisions that are aligned with the company's policies and regulatory standards. The aim is to resolve disputes fairly, providing players with clear reasoning behind the decisions made.

Importantly, the dedicated team ensures transparent communication with the player throughout the dispute resolution process. This helps maintain trust and keeps the player informed at every stage, from acknowledging the complaint to delivering a final resolution. By ensuring that all parties are kept up to date, Mill Interactive B.V. demonstrates its commitment to handling disputes in a timely, transparent, and unbiased manner.

7.3. Transparent Communication with Players Throughout the Dispute Resolution Process

Mill Interactive B.V. prioritizes clear and transparent communication with players throughout every stage of the dispute resolution process. The company understands that players want to be fully informed of the progress of their complaint and the steps taken to address it. To facilitate this, Mill Interactive B.V. provides regular updates to players, ensuring they are always aware of the current status of their dispute and any actions that are being taken to resolve the issue. This proactive approach helps alleviate uncertainty and fosters trust between the company and its players.

Transparency is also critical when it comes to the outcome of the dispute. Regardless of whether the decision favors the player or the company, Mill Interactive B.V. ensures that the reasoning behind the final determination is thoroughly explained. The company provides a clear explanation of why the decision was made, often sharing relevant documentation or evidence to support the conclusion. This helps players understand the basis for the decision and ensures that they feel treated fairly, even if the outcome is not in their favor.

To further reinforce its commitment to transparency and fairness, Mill Interactive B.V. offers players the right to appeal a dispute resolution decision if they feel the outcome was unsatisfactory. This appeal process adds an extra layer of oversight, ensuring that the company's processes remain accountable, objective, and open to review. By allowing players to challenge decisions they believe to be unfair, Mill Interactive B.V. demonstrates a commitment to providing equitable resolutions and maintains an open dialogue with its customers, reinforcing the company's dedication to customer satisfaction and trust.

The dispute resolution process at Mill Interactive B.V. is structured to ensure that players have an accessible, fair, and transparent way to resolve any issues related to their funds. By providing clear complaint channels, a dedicated and knowledgeable team to handle disputes, and transparent communication throughout the process, the company ensures that player concerns are addressed promptly and fairly. This approach not only enhances the customer experience but also helps maintain trust in the company's ability to handle disputes competently, further solidifying its reputation as a responsible operator in the iGaming industry.

Transparency. and Communication

8. Transparency and Communication

Mill Interactive B.V. is deeply committed to transparency when it comes to its handling of player funds, particularly in regard to the company's player fund segregation policy. This commitment ensures that players are well-informed about how their funds are managed, protected, and segregated, which is crucial in maintaining trust and accountability in the gaming industry.

8.1 Making the Policy Readily Available

Mill Interactive B.V. places a strong emphasis on transparency regarding the management and protection of player funds, and one of the key ways it achieves this is by making its player fund segregation policy easily accessible. This means that the company ensures that all players and visitors to its website can easily find and review the policy.

1. **Policy on the Website:** The player fund segregation policy is made available directly on the company's website, typically under a section dedicated to terms and conditions or privacy policies, so that any player or prospective customer can access it at any time. By making this policy visible and readily accessible, Mill Interactive B.V. ensures that players are informed about how their funds are managed and protected right from the start. This openness supports the company's reputation for transparency and builds trust with its users.
2. **Access Upon Request:** In addition to being available on the website, Mill Interactive B.V. offers an option for players to request the policy directly if they are unable to locate it or if they have specific inquiries about its content. This ensures that players are not left in the dark and can easily obtain the information they need about how their funds are safeguarded, without encountering any barriers.

By taking these steps, Mill Interactive B.V. demonstrates a proactive approach to openness and accountability. The company ensures that players are fully aware of how their funds are protected, thus fostering a sense of security and trust, which is vital for maintaining a positive relationship with its users.

8.2 Providing Clear Information about Fund Protection

Mill Interactive B.V. prioritizes clear communication regarding the protection of player funds to ensure that players understand how their financial resources are safeguarded. The company strives to make the information about fund protection easy to grasp, helping players feel confident about where and how their funds are kept safe.

- **Simple, Accessible Information:** Mill Interactive B.V. offers straightforward explanations about its fund protection practices. This includes detailing the separation of player funds from operational funds, outlining the steps taken to ensure that funds are held in secure, regulated accounts, and explaining the security measures used to protect those funds. By doing so, the company ensures that players do not feel confused or uncertain about the safety of their money.
- **Multiple Communication Channels:** To reach a wider audience and make the information accessible at all times, the company may provide fund protection details through several channels:
 - i. **FAQs:** A dedicated section on the website, addressing common questions about fund security.
 - ii. **Terms and Conditions:** Specific clauses in the terms and conditions document that outline fund segregation practices in an easy-to-understand manner.

This approach ensures that players can easily find and understand information related to their funds' protection, regardless of their experience level with online gaming platforms. By proactively providing this clarity, Mill Interactive B.V. reassures players that their financial interests are treated with the utmost care and transparency, which ultimately fosters a sense of trust and security.

8.3 Responding Promptly to Player Inquiries

Mill Interactive B.V. recognizes the importance of timely communication when it comes to addressing player inquiries about fund segregation and the security of their funds. The company places a high value on being responsive and accessible to players who have questions or concerns, ensuring that their inquiries are handled with urgency and clarity.

- 1) **Multiple Communication Channels:** To accommodate a wide range of player preferences, Mill Interactive B.V. offers several communication channels, such as:
 - a. **Email Support:** Players can send detailed inquiries via email, and the company ensures that each message is addressed within a reasonable timeframe.
 - b. **Support Chat:** A live chat feature enables players to receive instant responses, which is especially important for players seeking quick clarification.
 - c. **Phone Support:** For more complex inquiries, Mill Interactive B.V. provides the option for players to speak directly with a representative, allowing for a more personalized and thorough explanation.
- 2) **Timeliness and Thoroughness:** Mill Interactive B.V. strives to respond as quickly as possible, ensuring that players do not have to wait long for answers. The company aims to resolve issues swiftly, providing clear and detailed responses to players' questions about how their funds are protected and the company's fund segregation policies. Whether the inquiry is about specific processes or general information, Mill Interactive B.V. ensures players receive comprehensive answers that eliminate any confusion or concerns.
- 3) **Building Trust Through Communication:** By responding promptly and effectively, the company fosters a sense of trust with its players. Players are reassured that their concerns are taken seriously, and their financial security is a top priority. This transparency and commitment to addressing player inquiries strengthen the relationship between the company and its users, creating a more secure and supportive environment for players.

Mill Interactive B.V.'s commitment to responding promptly and thoroughly to player inquiries not only resolves concerns but also reinforces the company's reputation for openness and responsibility in managing player funds.

Through these measures, Mill Interactive B.V. reinforces its commitment to transparency and builds a solid foundation for ongoing communication and trust with its players. By providing accessible information and maintaining open channels for player inquiries, the company fosters a sense of security and confidence among its player bases.

CRYPTO SPECIFIC MEASURES

ETTCREUM EXTIXE

9. Crypto-Specific Measures

Mill Interactive B.V. accepts USDT, BTC, and ETH for deposits, implementing a comprehensive framework to ensure secure and compliant cryptocurrency management. Recognizing the unique risks associated with digital currencies, the company employs targeted measures to mitigate volatility and enhance operational transparency.

To address cryptocurrency volatility, the company primarily uses USDT, a stablecoin pegged to the US dollar, minimizing fluctuations in player fund values. Additionally, BTC and ETH balances are carefully monitored to mitigate financial risks. Separate crypto accounts are maintained for distinct purposes such as player balances, operational expenses, and software provider payments to ensure fund segregation and clarity.

Wallet address verification adds another layer of security by requiring players to register their wallets before transactions and preventing subsequent changes. This ensures traceability and reduces the risk of fraud or unauthorized activity. Through suspicious activity monitoring, advanced tools analyse transactions for irregular patterns, flagging potential money laundering or terrorist financing risks. Enhanced due diligence is applied to high-risk transactions, ensuring compliance with anti-money laundering (AML) regulations.

9.1 Limited Exposure to Cryptocurrency Volatility

Mill Interactive B.V. has developed a comprehensive approach to mitigate risks associated with cryptocurrency price volatility, prioritizing financial stability and player fund protection. This strategy includes the following measures:

9.1.1 Stablecoin Usage (USDT)

The company leverages USDT, a stablecoin pegged to the US dollar, as its primary cryptocurrency for deposits and withdrawals. USDT's stable value minimizes exposure to the unpredictable price fluctuations inherent in cryptocurrencies like BTC and ETH. This stability ensures that both player deposits and withdrawals maintain a consistent value, providing financial predictability and reducing operational risks associated with fluctuating exchange rates.

9.1.2 Managing Volatile Assets (BTC and ETH)

For BTC and ETH, which are subject to significant market price changes, the company has established mechanisms to monitor and manage these assets effectively. Market conditions are closely observed, and balances are adjusted as necessary to protect the integrity of player funds. This proactive approach ensures that sudden market downturns do not compromise the company's ability to honour player withdrawals or manage its cryptocurrency holdings.

9.1.3 Separate Accounts for Crypto Transactions

To ensure transparency and reduce risks, Mill Interactive B.V. maintains distinct crypto accounts for different operational functions:

- I. **User Balances and Withdrawals:** Player funds are held in dedicated accounts, completely segregated from operational funds. This separation ensures that player assets are protected and cannot be used for business expenses.
- II. **Software Provider Payments and Office Expenses:** Operational funds for expenses such as licensing fees, software provider payments, and office costs are stored in separate wallets. This strict segregation avoids comingling of player and company funds, safeguarding player deposits from operational liabilities.
- III. **Emergency Top-Ups:** The company maintains a contingency plan for extraordinary circumstances. If player withdrawal demands exceed the liquidity of the dedicated account, funds can be replenished from the company's main operational account. This ensures the company can meet withdrawal obligations without delay.

By taking these precautions, Mill Interactive B.V. shows its dedication to protecting player funds and upholding financial stability while also reducing its exposure to cryptocurrency volatility. This strong framework promotes trust among its participants and stakeholders and is in line with industry best practices.

9.2 Wallet Address Verification

Mill Interactive B.V. employs a rigorous wallet address verification process to enhance the security and compliance of cryptocurrency transactions. This measure is integral to safeguarding player funds and maintaining a transparent, fraudfree operational environment. The key components of this strategy include:

9.2.1 Mandatory Registration

Players must pre-register their cryptocurrency wallet addresses with the platform before initiating any deposits. This mandatory process ensures that all transactions originate from verified wallets owned by the player. By implementing this requirement, the company eSectively reduces the risk of unauthorized transactions, fraud, or attempts to bypass platform security. The registration process often involves confirming ownership of the wallet, such as requiring players to send a small validation transaction to prove control over the address.

9.2.2 Change Prevention for Security

Once a wallet address is registered, it is locked and cannot be altered without a thorough verification process. This restriction ensures a clear and auditable transaction trail. Preventing wallet address changes without proper authorization reduces the risk of illicit activities, including identity theft or account hijacking, where malicious actors might attempt to redirect funds to their wallets. By maintaining strict controls on wallet modifications, the company safeguards both its players and its platform from potential security breaches.

9.2.3 Traceability and Transparency

Mill Interactive B.V.'s wallet verification process significantly enhances traceability, a critical component for compliance with anti-money laundering (AML) regulations. By verifying and locking wallet addresses, the company ensures that every transaction can be traced back to an individual player. This transparency not only aids in monitoring for suspicious activity but also provides a robust audit trail for regulatory oversight.

Moreover, this approach facilitates seamless reporting to relevant financial intelligence units (FIUs) if any suspicious transactions are detected. It also reassures players that their funds are being managed in a secure and regulated environment.

Mill Interactive B.V. reaSirms its dedication to safe and legal cryptocurrency transactions by requiring preregistration, limiting unauthorized changes, and placing a strong emphasis on traceability. In addition to guaranteeing compliance with legal requirements and industry best practices, these steps promote trust among participants and stakeholders.

9.3 Suspicious Activity Monitoring

Mill Interactive B.V. employs a robust framework for monitoring suspicious cryptocurrency activities to safeguard its platform against financial crimes such as money laundering and terrorist financing. Advanced transaction monitoring tools analyse player transactions in real-time to detect unusual patterns, such as large deposits followed by rapid withdrawals or activity linked to high-risk jurisdictions. These tools are integrated with the company's anti-money laundering (AML) framework to ensure compliance with global and local regulations. Alerts generated by these systems prompt immediate investigations by the compliance team, who assess transaction logs, player profiles, and the source of funds to address any potential risks. High-risk transactions, including those involving substantial sums or flagged jurisdictions, are subject to enhanced due diligence (EDD) measures, which involve verifying documentation, evaluating transaction legitimacy, and applying stricter scrutiny. Through these proactive measures, Mill Interactive B.V. not only mitigates the risks associated with cryptocurrency transactions but also reinforces player trust and regulatory compliance, ensuring the platform's security and integrity.

9.4 Liquidity Management and Fund Accessibility

Mill Interactive B.V. employs a structured approach to liquidity management and fund accessibility, ensuring player assets are protected and withdrawals are processed seamlessly. The company maintains dedicated crypto accounts for diSerent purposes, with player funds securely held in accounts segregated from operational finances. This segregation enhances transparency and ensures that operational needs do not aSect the availability of player funds.

To guarantee uninterrupted withdrawals, the company upholds liquidity reserves in its player fund accounts, maintaining sufficient balances to handle routine withdrawal requests efficiently. In the event of unforeseen circumstances, such as an unexpected surge in withdrawal requests, a contingency plan is in place to top up player accounts from operational reserves, ensuring liquidity without delay.

This meticulous approach underscores the company's focus on financial stability by protecting player assets while effectively managing its operational requirements. By aligning fund accessibility with robust financial controls, Mill Interactive B.V. builds trust among its players, demonstrating its unwavering commitment to transparency, security, and customer satisfaction.

9.5 Benefits of Crypto-Specific Measures

Mill Interactive B.V.'s implementation of crypto-specific measures provides a range of advantages that enhance its operational resilience, regulatory adherence, and player trust. These measures are thoughtfully designed to address the unique challenges associated with cryptocurrency transactions while delivering tangible benefits for the company and its stakeholders.

9.5.1 Risk Mitigation

By adopting strategies to manage cryptocurrency volatility, such as limiting exposure through stablecoin use (USDT) and monitoring BTC and ETH balances, the company minimizes the financial risks linked to fluctuating asset values. In addition, wallet address verification adds a layer of security, reducing the risk of fraud, unauthorized access, or operational disruptions. Together, these steps safeguard the company and its players from potential losses or irregularities.

9.5.2 Regulatory Compliance

The robust integration of measures like transaction monitoring and wallet address verification ensures compliance with anti-money laundering (AML) and know-your-customer (KYC) standards. These practices align with global financial regulations, helping Mill Interactive B.V. maintain its legal standing and avoid penalties. Proactively addressing regulatory requirements also enhances the company's reputation as a responsible operator.

9.5.3 Player Trust

Transparent fund management practices, including segregated accounts for player balances and clear communication about fund security, foster player confidence. Knowing that their deposits are protected, and their funds are managed securely encourages players to trust the platform, improving customer satisfaction and fostering long-term loyalty.

9.5.4 Operational Efficiency

The use of separate crypto accounts for player funds, operational expenses, and emergency reserves streamlines financial management. This clear distinction between funds ensures smooth operations while safeguarding player assets. The ability to promptly top up player fund accounts in extraordinary situations demonstrates a proactive approach to maintaining liquidity and operational reliability.

These crypto-specific measures not only enhance Mill Interactive B.V.'s ability to operate securely and efficiently but also position the company as a trusted and compliant player in the iGaming industry. They reflect the company's commitment to addressing the complexities of cryptocurrency transactions with diligence and transparency.

Mill Interactive B.V.'s crypto-specific measures reflect a comprehensive and proactive approach to managing digital assets. By addressing the unique risks associated with cryptocurrencies, the company safeguards player funds, ensures operational stability, and complies with regulatory obligations, further cementing its reputation as a trustworthy and responsible operator in the iGaming industry.

10. Record Retention and Timeframes

Record retention is a critical aspect of Mill Interactive B.V.'s compliance and operational strategy, ensuring transparency, regulatory adherence, and the safeguarding of player interests. The retention of records associated with the segregation of player funds is structured to meet legal obligations, provide audit readiness, and support eSective internal governance. Below is a detailed breakdown of key elements in the retention policy.

10.1 Player Transaction Records

Player Transaction Records are essential for maintaining transparency and compliance in managing player funds. These records detail deposits, withdrawals, and account balances for every player and are retained for a minimum of 5 years. The retention ensures a clear audit trail for all transactions, aligning with AML regulations and supporting investigations or financial disputes. By maintaining these records, Mill Interactive B.V. demonstrates adherence to legal standards and provides reassurance to regulators and auditors that player funds are accurately managed, enhancing trust and operational accountability.

10.2 Bank and Crypto Account Statements

Bank and Crypto Account Statements are monthly records that detail the transactions and balances of accounts used for player funds and operational purposes. Mill Interactive B.V. retains these statements for at least 5 years, ensuring compliance with regulatory requirements. These statements serve multiple purposes: they demonstrate the segregation of player funds from operational accounts, ensuring transparency and accountability. They also facilitate the reconciliation process by verifying that funds are accurately allocated and managed. Furthermore, these records provide essential evidence of liquidity and fund accessibility, which is crucial during regulatory audits. Maintaining these statements strengthens financial integrity and supports the company's commitment to safeguarding player assets.

10.3 Internal Fund Reconciliation Reports

Mill Interactive B.V. generates periodic reports to reconcile player funds with operational accounts, ensuring accurate and transparent financial management. These reports are retained for a minimum of 5 years to fulfil with regulatory requirements and support audit readiness. The primary purpose is to validate adherence to the company's policy of fund segregation, demonstrating that player funds remain distinct from operational finances.

By regularly reconciling accounts, discrepancies such as accounting errors or irregular transactions are identified and rectified promptly, reducing financial and operational risks. This process also strengthens internal controls, ensuring the company's compliance with industry best practices and AML requirements. Reconciliation reports enhance transparency, build trust with stakeholders, and support decision-making by providing clear insights into fund management. These measures collectively reinforce Mill Interactive B.V.'s commitment to financial integrity and regulatory compliance.

10.4 AML and KYC Compliance Records

Mill Interactive B.V. maintains comprehensive records related to anti-money laundering (AML) compliance, which include player identity verification documents, transaction monitoring logs, and records of flagged suspicious activities. These records are retained for at least five years after the player's account is closed, ensuring adherence to regulatory requirements and industry standards.

The primary purpose of these records is to comply with AML regulations designed to prevent money laundering and terrorist financing. They provide a traceable and accountable record of all player transactions, supporting transparency and enhancing the integrity of the platform. These records also play a critical role in facilitating cooperation with regulators and law enforcement agencies, enabling timely investigations when needed. By ensuring thorough record retention and robust monitoring, Mill Interactive B.V. strengthens its AML framework and safeguards its operations against financial crimes.

10.5 Policy Change and Player Notification Records

Mill Interactive B.V. maintains detailed records of any changes made to its Player Fund Segregation Policy and associated notifications sent to players. These records are retained for a minimum of five years, ensuring a transparent and auditable history of policy evolution.

The purpose of retaining these records is to demonstrate the company's commitment to transparency in communicating updates to players. They provide a historical log for internal assessments and external reviews, showcasing the company's proactive approach to compliance. Additionally, these records serve as evidence of adherence to regulatory requirements, reinforcing trust with stakeholders and regulators.

10.6 Audit Records for Fund Segregation Practices

Mill Interactive B.V. retains documentation of internal and external audits related to its player fund segregation practices for a minimum of six years. These records provide essential assurance to regulators that the company complies with its segregation policies and gaming regulations.

The audits also identify opportunities to improve compliance and operational efficiency, ensuring continuous enhancement of internal controls. By maintaining these records, the company supports accountability and transparency, demonstrating its alignment with regulatory standards and commitment to protecting player funds.

10.7 Operational Expense and Fund Transfer Records

Mill Interactive B.V. maintains detailed records of operational expenses and any transactions involving player fund accounts for a minimum of five years. These records ensure that player funds are kept separate from operational expenses, preventing co-mingling. They support financial transparency during routine audits and demonstrate the company's adherence to its fund segregation mechanisms, reinforcing trust and compliance with regulatory standards.

10.8 Financial System Access Logs

Mill Interactive B.V. maintains logs of all access to the financial systems managing player funds for a minimum of two years. These logs track user activity to ensure that only authorized personnel access sensitive financial data. They help detect potential security breaches, enabling swift incident response actions. By keeping detailed access logs, the company enhances its cybersecurity standards, supporting both internal security protocols and compliance with regulatory requirements for protecting financial information.

10.9 Retention Practices

Mill Interactive B.V. ensures secure storage of all records by keeping them in encrypted digital formats, with access restricted to authorized personnel only. The retention periods for records comply with legal and regulatory requirements, including those set by the Curacao Gaming Control Board (GCB). Once records surpass their designated retention period, they are securely destroyed to prevent unauthorized access or potential data breaches. This approach protects sensitive information, maintains compliance with regulations, and safeguards the company from potential legal and security risks.

Mill Interactive B.V. implements structured retention practices to ensure that all records related to the Player Fund Segregation Policy are accessible for audits, investigations, and regulatory reviews. These practices support the company's commitment to operational integrity by maintaining accurate and up-to-date records. By adhering to proper retention timeframes, Mill Interactive B.V. enhances transparency and ensures that records are readily available when required. This approach not only fosters player trust but also demonstrates the company's dedication to compliance with legal and regulatory obligations, reinforcing its commitment to best practices in fund segregation.

11. Appendices

Appendix A: Player Fund Segregation Process Flow

Purpose:

To provide a visual representation and detailed description of how player funds are managed and segregated from operational funds, ensuring financial transparency and compliance with regulatory standards.

Process Step	Description	Controls to Prevent Co-Mingling
1. Deposit Process		
Player Initiates Deposit	Players transfer funds via fiat or cryptocurrency (USDT, BTC, ETH) to Mill Interactive B.V.'s designated player deposit account or crypto wallet.	Dedicated Deposit Accounts: Separate accounts for player deposits distinct from operational funds.
Verification and Traceability	For cryptocurrency deposits, players must use their pre-registered and verified wallet addresses. AML/KYC checks are performed to monitor for suspicious activity.	Wallet Address Registration: Mandatory pre-registration of wallet addresses to ensure traceability.
Fund Allocation	Deposited funds are credited to the player's account balance and held in a segregated player fund account.	Segregated Player Fund Accounts: Ensures player funds are kept separate from operational finances.
2. Fund Usage (Gaming Transactions)		
Gaming Activity	Players use their account balances to place bets or engage in gaming activities on the platform.	Real-Time Transaction Tracking: Monitors all gaming transactions to maintain accurate account balances.
Account Monitoring	The system continuously tracks all transactions to prevent discrepancies and ensure accurate fund management.	Regular Monitoring and Reconciliation: Ensures ongoing accuracy and detects any irregularities promptly.
3. Withdrawal Process		
Player Requests Withdrawal	Players submit withdrawal requests through the platform's interface.	Verification Checks: Ensures players have sufficient funds and comply with AML requirements before processing withdrawals.
Verification	The system verifies the withdrawal request against the player's balance and transaction history.	Dual Authorization: Withdrawal transactions require approval from both the CFO and Head of Compliance.

Processing Withdrawal	Approved funds are transferred from the segregated withdrawal account to the player's registered wallet address.	Separate Withdrawal Accounts: Dedicated accounts for processing withdrawals to prevent mixing with operational funds.
4. Operational Funds Flow		
Operational Expenses	Funds used for software provider payments, office expenses, and other operational costs are managed separately from player funds.	Separate Operational Accounts: Ensures no co-mingling of operational expenses with player funds.
Emergency TopUps	In extraordinary circumstances, player fund accounts can be replenished from the main operational account to maintain liquidity for withdrawals.	Contingency Plans: Maintains an emergency account to top up player funds without affecting operational finances.
5. Reconciliation and Audit		
Daily Reconciliation	The finance team performs daily reconciliations to ensure player account balances match internal records and segregated fund accounts.	Daily Reconciliation Processes: Regular checks to maintain accurate segregation and identify discrepancies early.
Monthly Reviews	At month-end, a comprehensive reconciliation report is generated, reviewed by the Head of Finance, and submitted to senior management for oversight.	Monthly Audits and Reviews: Ensures ongoing compliance with segregation policies and identifies areas for improvement.
6. Controls in Place		
Dedicated Accounts	Separate accounts are maintained for player deposits, withdrawals, operational expenses, and emergency reserves.	Clear Account Segregation: Prevents any overlap between player funds and operational finances.
Transaction Monitoring	All transactions are monitored for irregularities or suspicious activities to prevent fraud and ensure compliance with AML regulations.	Advanced Monitoring Tools: Utilizes technology to detect and flag unusual transaction patterns.
Internal Audits	Regular internal audits are conducted to verify compliance with fund segregation policies and ensure the integrity of player funds.	Scheduled Audits: Periodic reviews to maintain adherence to segregation policies and regulatory requirements.

Flowchart: Player Fund Segregation Process

Below is a simplified visual representation of the fund flow process:

Step	Action
Player Deposit	Player deposits funds → Verified and credited to Player Fund Account
Gaming Activity	
Withdrawal Request	
Fund Transfer	

Operational Funds Flow:

Separate Operational Accounts:

Handle software payments, oSice expenses, and other operational costs independently from player fund accounts.

This table and flowchart outline the comprehensive process Mill Interactive B.V. employs to manage and segregate player funds from operational funds. By maintaining separate accounts, implementing rigorous verification and monitoring processes, and conducting regular reconciliations and audits, the company ensures the security, transparency, and integrity of player funds. These measures prevent co-mingling with operational finances, enhance regulatory compliance, and build trust with players by safeguarding their financial interests.

Appendix B: Bank Account Details and Segregation Mechanisms

Purpose:

To specify the types of accounts used for player funds and the mechanisms in place to segregate them from operational accounts, ensuring financial transparency, regulatory compliance, and the protection of player assets.

Account Type	Account Name/Description	Segregation Mechanism	Reconciliation and Monitoring
Player Fund Account	Player Deposit Account	Dedicated account solely for player deposits and withdrawals.	Daily reconciliations of account balances with player fund records.
Crypto Fund Account	Player Crypto Deposit Account (USDT, BTC, ETH)	Separate crypto wallet for player deposits in USDT, BTC, and ETH.	Regular transaction monitoring to track deposits and withdrawals from crypto accounts.
Operational Account	Company Operational Account	Separate account for operational expenses (e.g., software payments, oSice expenses).	- Monthly reconciliation to ensure no comingling of funds with player accounts.

Emergency Fund Account	Emergency Liquidity Reserve	Separate account used to top-up player fund accounts in case of extraordinary withdrawal surges.	Monitored quarterly for sufficient balance to cover potential withdrawals.
Escrow Account (if applicable)	Player Refunds or Claims Escrow Account	Escrow account used for holding funds until a dispute or claim is resolved.	Monthly review and audit of escrow balances and transaction activity.
Trust Fund Account	Player Trust Account	Used for long-term holding of player funds to ensure they remain untouched for gaming purposes.	Periodic audits to ensure compliance with trust fund guidelines and player fund segregation policies.

Account Type Definitions:

1. **Player Fund Account:** Account used solely for player deposits and withdrawals. Ensures funds are segregated from operational accounts and available for player transactions.
2. **Crypto Fund Account:** Account that handles cryptocurrency deposits and withdrawals (USDT, BTC, ETH). Separate wallets are maintained to avoid co-mingling with operational funds.
3. **Operational Account:** Account used for company expenses, ensuring player funds are separate from operational finances.
4. **Emergency Fund Account:** An account held for unexpected liquidity needs, used to top-up player accounts if withdrawal requests exceed available funds.
5. **Escrow Account:** Used to hold funds related to unresolved disputes or claims until they are resolved.
6. **Trust Fund Account:** Long-term holding account ensuring player funds are protected and cannot be used for operational purposes.

Reconciliation and Monitoring Mechanisms:

- 1) **Daily Reconciliation:** Player fund accounts are reconciled daily to ensure all deposits and withdrawals are accurately recorded and player balances are correct.
- 2) **Monthly Reconciliation:** Operational accounts are reconciled monthly to ensure no player funds are comingled with operational expenses.
- 3) **Regular Monitoring:** Automated monitoring tools are used to track transactions and ensure compliance with segregation rules.
- 4) **Audits and Reviews:** Regular audits (quarterly or annually) are conducted to ensure account balances are accurate and in compliance with segregation policies.

This table outlines how Mill Interactive B.V. manages and segregates player funds from operational funds. By using separate accounts for different purposes, implementing reconciliation and monitoring procedures, and ensuring regular audits, the company demonstrates its commitment to maintaining player fund security and regulatory compliance while promoting transparency and trust.

Appendix C: Financial Reporting and Reconciliation Process

Purpose:

To outline how Mill Interactive B.V. ensures transparency and accuracy in the financial reporting of player funds, including the reconciliation process and actions taken if discrepancies are identified.

Process Step	Description	Frequency	Responsible Party	Action if Discrepancies are Found
Daily Reconciliation of Player Funds	Reconciliation of player deposit and withdrawal transactions to ensure balances are accurate.	Daily	Finance/Accounting Department	- Immediate investigation of discrepancies. - Temporary suspension of further transactions until resolved.
Monthly Account Reconciliation	Reconciliation of all operational accounts, player fund accounts, and crypto wallet balances.	Monthly	Finance/Accounting Department	- Full review of transaction history. - Cross-checking of account balances with internal records. - Report findings to Compliance Officer.
Crypto Transaction Monitoring	Monitoring and reconciling crypto wallet balances (USDT, BTC, ETH).	Daily	Crypto Operations Team	- Cross-referencing transaction logs with wallet balances. - Immediate action if discrepancies are detected.
Escrow Account Reconciliation	Ensuring escrow accounts used for dispute resolutions are accurate and properly allocated.	Monthly	Legal/Compliance Department	- Verify disputed transactions and segregate funds. - Investigate any inconsistencies.
Emergency Fund Account Reconciliation	Reconciliation to ensure sufficient funds are available in the emergency liquidity account to cover withdrawal surges.	Quarterly	Finance/Operations Team	- Transfer funds from operational accounts if emergency liquidity is insufficient.
Financial Reporting to Stakeholders	Preparing detailed financial reports to share with relevant stakeholders (regulators, auditors).	Quarterly or annually	Finance Department/Compliance Officer	- Report discrepancies to regulatory bodies if needed. - Implement corrective actions and

				internal audits if required.
Internal Audit of Financial Records	Independent internal audit of all financial records to verify compliance with segregation policies.	Annually	Internal Auditor	- Conduct a full audit trail analysis. - Adjust internal controls and policies if required.

Action Steps if Discrepancies are Found:

- 1) **Investigation and Resolution:** When discrepancies are identified, a thorough investigation is launched to understand the source of the error. Any missing funds are traced, and corrective actions are taken immediately.
- 2) **Temporary Suspension:** If discrepancies are significant, the company may suspend transactions to prevent further issues. This ensures player funds are protected while discrepancies are addressed.
- 3) **Internal Review and Corrective Actions:** If necessary, the issue is escalated for an internal review, followed by corrective measures such as updating internal controls, adjusting financial processes, or retraining staS.
- 4) **Reporting to Regulators:** In cases of substantial discrepancies that could aSect compliance or financial stability, regulators are notified as part of the company’s commitment to transparency and accountability.

This table outlines Mill Interactive B.V.'s financial reporting and reconciliation processes, highlighting the steps taken to ensure accurate and transparent management of player funds. The company's robust reconciliation practices, combined with its corrective action protocols, help maintain the integrity of player fund segregation while complying with financial regulations.

Appendix D: Regulatory Compliance Checklist

Purpose:

To provide a checklist of all regulatory requirements related to player fund segregation, ensuring Mill Interactive B.V. consistently adheres to the standards set by regulatory bodies, including the Curacao Gaming Control Board (GCB) and other relevant authorities.

Regulatory Requirement	Description	Regulatory Authority	Compliance Status	Action Required if non-compliant
Segregation of Player Funds	Player funds must be kept in separate accounts from operational funds to protect the integrity of player balances.	Curacao Gaming Control Board (GCB), FATF	Compliant or non-compliant	Review and segregate any comingled funds.
Secure Storage and Management of Player Funds	Funds must be securely stored in accounts that are	Curacao Gaming Control Board	Compliant or non-compliant	Implement stronger security protocols and audits.

	protected from misuse or fraud.	(GCB), AML Regulations		
Transparency and Reporting	The company must provide clear and accessible reporting of player fund management and segregation practices.	Curacao Gaming Control Board (GCB), International Gaming Standards	Compliant or non-compliant	Update reporting procedures and make information more accessible.
Independent Audit of Fund Segregation	Regular audits of player fund segregation practices to ensure compliance with regulations.	Curacao Gaming Control Board (GCB), International Auditing Standards	Compliant or non-compliant	Schedule external audits and ensure proper documentation.
AML and KYC Compliance	Compliance with AntiMoney Laundering (AML) and Know Your Customer (KYC) regulations to prevent illicit activities related to player funds.	Financial Action Task Force (FATF), Curacao Gaming Control Board (GCB)	Compliant or non-compliant	Implement additional training for staS and review AML/KYC procedures.
Crypto-Specific Regulations	Ensure proper segregation and reporting of cryptocurrency (USDT, BTC, ETH) transactions as per regulatory guidelines.	Curacao Gaming Control Board (GCB), Local Crypto Regulations	Compliant or non-compliant	Update crypto policies and procedures to align with regulations.
Emergency Fund Accessibility	Player funds must be accessible for withdrawals at all times, with contingency measures in place for liquidity shortfalls.	Curacao Gaming Control Board (GCB), International Financial Regulations	Compliant or non-compliant	Increase liquidity reserves and create a contingency plan.
Player Fund Protection during Disputes	Ensure player funds are protected during dispute resolution processes, maintaining their segregation.	Curacao Gaming Control Board (GCB), Consumer Protection Regulations	Compliant or non-compliant	Review and enhance dispute resolution processes.
Ongoing Compliance and Monitoring	Continuous monitoring of all processes related to player fund segregation and operational finances to ensure sustained compliance.	Curacao Gaming Control Board (GCB), FATF	Compliant or non-compliant	Conduct regular internal reviews and assessments.
Documentation and Record Keeping	Maintain clear and accurate records of all player fund transactions,	Curacao Gaming Control Board (GCB), International	Compliant or non-compliant	Ensure all documentation is up

	deposits, withdrawals, and segregations.	Record-Keeping Standards		to date and easily accessible.
--	--	--------------------------	--	--------------------------------

Notes:

Compliance Status:

- Compliant: The company has implemented the required measures and is in full compliance with the specified regulation.
- Non-Compliant: The company has identified areas of non-compliance, and corrective actions are being taken.

Action Required: The actions listed in the "Action Required" column are steps that must be taken if the company is found to be non-compliant with any regulatory requirements.

This Regulatory Compliance Checklist provides a clear overview of the critical regulations related to player fund segregation. By using this checklist, Mill Interactive B.V. can monitor its adherence to regulatory standards, identify any areas needing improvement, and ensure ongoing compliance. Regular assessments against this checklist will help the company maintain the highest standards in player fund protection, transparency, and regulatory adherence.

Appendix E: Player Communication Forms

Purpose:

To define the communication process with players regarding the segregation of their funds, ensuring clear, transparent, and consistent messaging about the security and management of their deposits.

Form Type	Purpose/Description	Details
Fund Segregation Confirmation	To inform players that their funds are securely segregated from operational funds.	Acknowledges that the company complies with regulations by maintaining separate accounts for player funds.
Policy Update Notification	To notify players of any changes or updates to the fund segregation policy.	Sent when there is an update to the policy regarding player fund segregation.
Withdrawal Process Notification	To communicate with players about their withdrawal request, confirming the process and fund segregation.	Sent when a withdrawal request is made, to confirm the segregation of funds and the status of the request.
Inquiry Response - Fund Segregation	To respond to player inquiries about the security and management of their funds.	A formal response to any inquiry related to the segregation and protection of player funds.
Fund Segregation Acknowledgment	To confirm that the player has acknowledged the fund segregation policy.	Acknowledgment form to confirm player’s understanding of how their funds are segregated.
Emergency Fund Accessibility Notification	To notify players of any changes or issues regarding the accessibility of their funds, particularly in emergencies.	Notifies players of any exceptional measures, such as emergency fund topups, or issues that might temporarily affect withdrawals.

Notes:

- 1) **Purpose of Templates:** These communication forms ensure that Mill Interactive B.V. maintains a consistent and transparent approach when interacting with players regarding fund segregation. The goal is to create clear, professional messages that reassure players of the security and proper management of their funds.
- 2) **Customization:** Each template can be customized with specific player details or additional information as needed. The language should be professional and clear, ensuring that players understand the company’s commitment to safeguarding their funds.
- 3) **Accessibility:** These forms should be easily accessible to customer support teams to facilitate timely responses to player inquiries and updates.

Appendix E provides a structured set of communication templates designed to ensure that Mill Interactive B.V. consistently conveys information to players regarding the segregation and security of their funds. By using these templates, the company can ensure timely, transparent, and clear communication that reinforces trust and compliance.

Appendix F: Dispute Resolution Forms

Purpose:

To ensure there is a clear mechanism in place for players to raise disputes regarding the segregation and security of their funds, providing an organized process to address complaints and track progress.

Form Type	Purpose/Description	Details
Fund Segregation Dispute Form	Form for players to submit formal disputes about the segregation of their funds.	Allows players to submit complaints regarding how their funds are segregated or managed.
Dispute Acknowledgment Receipt	Acknowledgment receipt confirming that the dispute has been received and is under review.	Sent to players to confirm that their dispute has been received and will be addressed.
Dispute Resolution Status Update	Provides players with periodic updates on the status of their dispute resolution process.	Sent to players to keep them informed of the progress of their dispute.
Final Dispute Resolution Response	A formal response detailing the resolution of the dispute, including any action taken.	Sent once the dispute has been resolved, outlining the resolution and the rationale.
Dispute Appeal Form	Form for players to formally appeal the outcome of their dispute if they are unsatisfied.	Used by players if they wish to challenge the final decision on their dispute.
Dispute Resolution Feedback Form	A feedback form for players to provide input on the dispute resolution process.	Sent after dispute resolution to gather feedback from the player on their experience.

Notes:

- 1) **Purpose of Forms:** These forms create a transparent, organized process for addressing player concerns about the segregation and security of their funds. By having standardized templates, Mill Interactive B.V. can ensure consistency and clarity in communicating with players.

- 2) **Customization:** Each template should be customizable based on the specifics of the player's dispute and the company's processes. Specific details like account numbers, dates, and amounts should be included to ensure accuracy.
- 3) **Accessibility:** The dispute forms should be easily accessible on the company's platform or via customer support to ensure players can easily file complaints or raise concerns regarding their funds.

Appendix F provides a structured and organized set of dispute resolution forms to address issues related to player fund segregation. These forms ensure a consistent, transparent, and fair process, reinforcing player trust and maintaining regulatory compliance.