

Novi B.V. Segregated Customer Money Policy

Objective:

The purpose of this policy is to outline the company's procedures for handling and safeguarding customer funds, ensuring that player balances are appropriately protected at all times.

1. Customer Deposits

All customer deposits are initially received in the Payment Service Provider (PSP) wallets designated for this purpose. These wallets serve as the primary repository for all funds deposited by players.

2. Monthly Settlements

In the PSPs that handle both deposits and payouts, settlements to Novi BV bank accounts are conducted on a monthly basis. The settlement is for the amount exceeding the total player balances, ensuring that sufficient funds remain within the PSP wallets to cover all active player balances at any given time.

3. Player Balance Protection

During the monthly review, if it is determined that the total amount in PSP wallets that process payouts falls below the total of all player balances—due to automatic settlements by PSPs that only handle deposits—an amount equal to the shortfall is transferred to a separate bank account. This account, known as the "Players Protection Account," is reserved exclusively for use in replenishing PSP balances when necessary, ensuring that all player funds are fully segregated and available for withdrawal at any time.

4. Top-Up Process

In the event that a PSP wallet's balance falls below the required amount to cover player withdrawals, the "Players Protection Account" will be used to top up the PSP wallet balance, ensuring that all customer withdrawals are processed without delay.

5. Safeguarding and Compliance

The company is committed to the highest standards of financial integrity and regulatory compliance. The use of the "Players Protection Account" ensures that player funds are always segregated from the company's operational funds, providing an additional layer of security for customer money.