

Operations Manual

Version 1.0

GAMEART

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EXECUTIVE INTRODUCTION

This Operational Manual has been developed to document the governance, operational, compliance, financial, human resource, and business continuity frameworks that support the activities of GameArt CU B.V.

The Company operates within a highly regulated and technology-driven environment, requiring effective governance, robust internal controls, clear accountability, and reliable operational processes. This Manual provides an overview of the Company's organizational structure, key functions, operational procedures, and control mechanisms designed to support the delivery of products and services to business partners while maintaining compliance with applicable legal, regulatory, and contractual obligations.

The Manual serves as a reference document for employees, management, auditors, business partners, and other authorized stakeholders seeking to understand how the Company conducts its operations and manages its responsibilities. It reflects the Company's commitment to operational excellence, responsible growth, risk management, information security, and continuous improvement.

GameArt recognizes that strong governance and well-defined operational processes are essential to maintaining long-term business sustainability, supporting innovation, and meeting the expectations of clients, regulators, and industry stakeholders. The Company therefore reviews and updates its operational framework periodically to ensure continued effectiveness and alignment with business objectives.

This Manual should be read in conjunction with the Company's supporting policies, procedures, standards, and operational records, which provide additional detail regarding specific processes and control activities.

Signed by:

-----16404BB3A12F4E1-----

Approved by: Dejan Jović

Chief Executive Officer

GameArt CU B.V.

Date:



Chapter 1

Introduction and Company Overview

We are a dynamic, forward-thinking organization built on a foundation of innovation, collaboration, and integrity. We believe in creating value not only for our clients but also for our employees because when our employees grow, we grow together.



CHAPTER 1. INTRODUCTION AND COMPANY OVERVIEW

1.1 PURPOSE OF THIS MANUAL

This Operational Manual has been prepared for GameArt CU B.V. ("GameArt" or the "Company") to document the Company's operational structure, governance framework, business processes, internal controls, and departmental responsibilities.

The Manual serves as a central reference document describing how the Company conducts its business activities, manages operational risks, maintains regulatory compliance, and delivers services to its business partners. It provides employees, management, auditors, regulators, and other authorised stakeholders with a clear understanding of the Company's operating model and control environment.

This Manual should be read in conjunction with the Company's policies, procedures, and supporting governance documentation. It is reviewed periodically and updated whenever material changes occur to the Company's business activities, organisational structure, technology environment, or regulatory obligations.

1.2 COMPANY OVERVIEW

GameArt CU B.V. is a Curaçao incorporated company operating under a licence issued by the Curaçao Gaming Authority ("CGA").

The Company operates exclusively within the Business-to-Business (B2B) gaming sector and provides online gaming content, aggregation services, platform technology, and technical integration solutions to licensed gaming operators and industry partners.

GameArt CU B.V. develops, certifies, hosts, and distributes online casino games through proprietary technology and integration platforms. In addition to its own gaming content, the Company facilitates the aggregation and delivery of third-party gaming content through its technology infrastructure.

The Company's products and services are designed to support licensed gaming operators by providing access to gaming content, integration capabilities, technical support, and operational expertise.

GameArt CU B.V. does not provide gambling services directly to end users. The contractual relationship with players remains with the licensed operator. Player registration, account management, payment processing, customer due diligence, anti-money laundering controls, and responsible gaming obligations are managed by the licensed operator in accordance with the regulatory requirements applicable to that operator.

1.3 MISSION AND STRATEGIC OBJECTIVES

The Company's mission is to provide reliable, scalable, and innovative gaming technology solutions that enable licensed operators to deliver high-quality gaming experiences within regulated markets.

To achieve this objective, GameArt CU B.V. focuses on:

- Delivering a diversified portfolio of gaming content.

- Building long-term strategic relationships with operators, aggregators, and technology providers.
- Maintaining high standards of regulatory compliance and corporate governance.
- Investing in technology, innovation, and product development.
- Ensuring operational resilience, information security, and service reliability.
- Supporting sustainable business growth through efficient and scalable operations.

The Company continuously evaluates opportunities to expand its product offering, strengthen its technology capabilities, and increase its presence in existing and emerging markets.

1.4 SCOPE OF OPERATIONS

The Company's operational activities are organised around several core business functions:

- Corporate Governance
- Product Development
- Platform Operations
- GameHub Operations
- Technology and Infrastructure Management
- Client Onboarding and Account Management
- Customer and Technical Support
- Finance and Financial Controls
- Compliance and Risk Management
- Human Resources and Training
- Information Security and Data Protection

Each function operates under clearly defined responsibilities, reporting lines, and internal controls designed to ensure efficient operations and regulatory compliance.

1.5 OPERATIONAL PRINCIPLES

GameArt CU B.V conducts its operations in accordance with the following principles:

- Regulatory compliance and transparency.
- Strong corporate governance.
- Information security and confidentiality.
- Operational resilience and business continuity.
- Product quality and innovation.
- Client-focused service delivery.
- Risk-based decision making.
- Continuous improvement and accountability.

These principles form the foundation of the Company's operational framework and support the achievement of its strategic objectives.

1.6 MISSION, VISION AND CORE PRINCIPLES

Mission

GameArt's mission is to develop and deliver innovative, reliable, and engaging gaming content and technology solutions for licensed operators and business partners worldwide. The Company is committed to maintaining high standards of quality, operational excellence, compliance, and customer service across all aspects of its business.

Vision

GameArt aims to be a trusted global provider of gaming content and technology solutions, recognized for creativity, technical excellence, responsible growth, and long-term partnerships with operators, aggregators, and industry stakeholders.

Core Principles

The Company's activities are guided by the following principles:

- **Quality and Innovation** – Delivering high-quality gaming products supported by continuous improvement and innovation.
- **Integrity and Compliance** – Conducting business in accordance with applicable laws, regulations, licensing requirements, and ethical standards.
- **Operational Excellence** – Maintaining reliable, scalable, and secure operational processes and technology environments.
- **Customer Focus** – Supporting operators and business partners through responsive service and long-term collaboration.
- **Responsible Growth** – Pursuing sustainable business growth while managing risk and protecting the Company's reputation.
- **People and Development** – Encouraging collaboration, professional development, and a culture of continuous learning.

Vision:

GameArt aims to be a trusted global provider of gaming content and technology solutions, recognized for creativity, technical excellence, responsible growth, and long-term partnerships with operators, aggregators, and industry stakeholders.

Mission:

- Deliver innovative and reliable gaming content
- Deliver exceptional quality in everything we do
- Build long term relationships with clients and collaborators
- Foster a culture of innovation respect, compliance and high standards of quality





Chapter 2

Corporate Governance and Organisational Structure



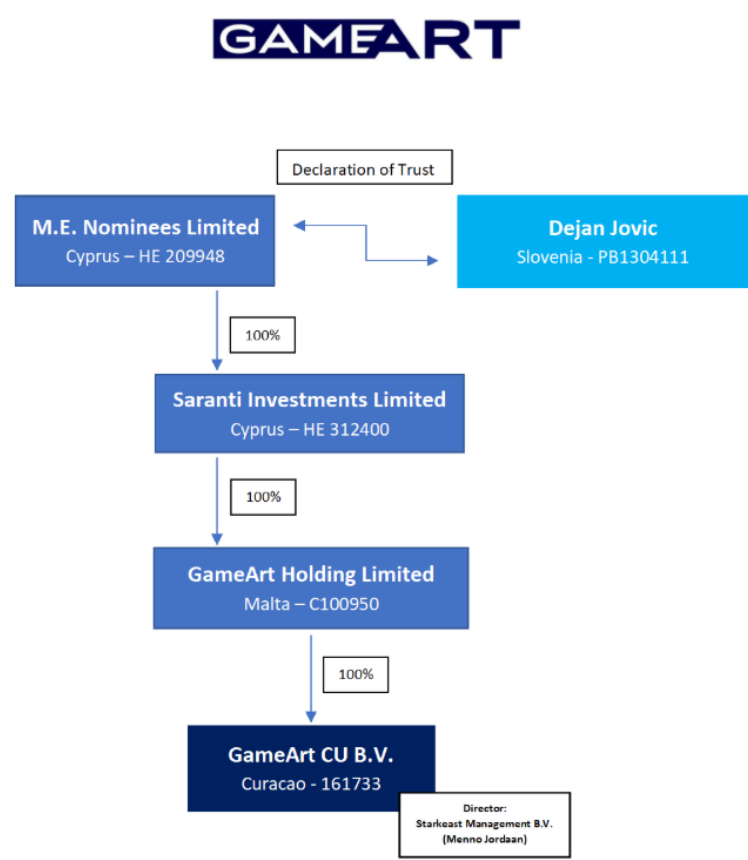
CHAPTER 2 – CORPORATE GOVERNANCE AND ORGANISATIONAL STRUCTURE

2.1 OWNERSHIP STRUCTURE

GameArt CU B.V. operates as a licensed Business -to- Business (B2B) gaming supplier under the supervision of the Curaçao Gaming Authority.

The Company forms part of a wider corporate group structure and is ultimately owned and controlled through its parent entities. The ownership structure has been established to support the Company's international operations while maintaining appropriate corporate governance, regulatory oversight, and accountability.

The Company's Ultimate Beneficial Owner ("UBO") exercises strategic oversight through the Board of Directors and senior management while day-to-day operational responsibilities are delegated to the executive management team and departmental heads.



The ownership structure, corporate control framework, and management reporting lines are maintained and reviewed to ensure compliance with applicable regulatory requirements and good corporate governance practices.

2.2 GOVERNANCE FRAMEWORK

GameArt CU B.V. maintains a governance framework designed to ensure effective oversight, accountability, risk management, and regulatory compliance across all areas of the business.

The governance framework establishes clear lines of responsibility and authority throughout the organisation and ensures that strategic objectives, operational activities, and regulatory obligations are managed in a controlled and transparent manner.

The Company's governance framework is based upon the following principles:

- Accountability and transparency.
- Effective oversight and decision-making.
- Segregation of duties.
- Risk-based management.
- Regulatory compliance.
- Operational integrity.
- Continuous monitoring and improvement.

Governance responsibilities are distributed across the Board of Directors, executive management, and departmental leadership functions.

2.3 BOARD OF DIRECTORS

The Board of Directors is responsible for the overall direction, governance, and strategic oversight of the Company.

The Board provides independent oversight of the Company's activities and ensures that management operates the business in accordance with applicable laws, regulatory obligations, licence conditions, and approved corporate objectives.

The Board's responsibilities include:

- Approval of strategic objectives and business plans.
- Oversight of regulatory compliance.
- Approval of major operational initiatives.
- Review of risk management activities.
- Oversight of financial performance.
- Review of significant incidents and material operational risks.
- Oversight of corporate governance arrangements.
- Monitoring the effectiveness of internal controls.

The Board receives periodic management reports and may request additional information from management where necessary to fulfil its oversight responsibilities.

2.4 EXECUTIVE MANAGEMENT

The day-to-day management of the Company is delegated to the executive management team.

Executive management is responsible for implementing the Company's strategic objectives, managing operational activities, allocating resources, and ensuring compliance with regulatory requirements.

The executive management team provides leadership across all operational functions and ensures coordination between departments.

Executive management responsibilities include:

- Operational management.
- Strategic implementation.

- Regulatory compliance oversight.
- Resource allocation.
- Financial management.
- Risk management.
- Performance monitoring.
- Stakeholder engagement.

Management meetings are held periodically to review operational performance, business objectives, regulatory developments, project status, and identified risks.

2.5 KEY MANAGEMENT FUNCTIONS

To ensure effective governance and operational oversight, the Company maintains a number of designated management functions.

Chief Executive Officer / Director

The Director is responsible for the overall management of the Company and ensures that business operations are conducted in accordance with approved strategic objectives and regulatory requirements.

Responsibilities include:

- Corporate leadership.
- Strategic planning.
- Business development.
- Regulatory engagement.
- Oversight of operational performance.
- Resource allocation and organisational management.

Chief Financial Officer (CFO)

The Chief Financial Officer is responsible for financial management, financial reporting, budgeting, forecasting, treasury activities, and financial controls.

The CFO oversees:

- Accounting and bookkeeping.
- Financial reporting.
- Regulatory financial obligations.
- Audit coordination.
- Financial risk management.
- Budget planning and monitoring.

Compliance Officer and MLRO

The Compliance Officer and Money Laundering Reporting Officer (MLRO) are responsible for ensuring compliance with applicable legal and regulatory requirements.

Responsibilities include:

- Regulatory compliance monitoring.
- Internal compliance reviews.
- Policy governance.
- Risk assessments.
- Reporting of regulatory matters.

- AML oversight.
- Staff awareness and training.

Chief Technology Officer (CTO)

The CTO is responsible for the Company's technology strategy, technical infrastructure, software development activities, information security controls, and platform operations.

Responsibilities include:

- Technology governance.
- Platform architecture.
- Infrastructure management.
- Development oversight.
- Information security.
- Technical innovation.

Chief People Officer

The Chief People Officer is responsible for human resources management, recruitment, employee development, performance management, and organisational culture.

Responsibilities include:

- Recruitment and onboarding.
- Employee development.
- Training programmes.
- Performance management.
- Employee welfare.
- Human resources compliance.

2.6 ORGANISATIONAL STRUCTURE

The Company's operational structure consists of specialised departments working collaboratively to deliver gaming products, technical services, and support functions.

Core operational departments include:

- Product Development.
- GameHub Operations.
- Technology and Infrastructure.
- Customer and Technical Support.
- Account Management.
- Finance.
- Compliance.
- Human Resources.
- Information Security.

Each department operates under defined responsibilities and reporting lines, ensuring accountability and operational efficiency.

2.7 DELEGATION OF AUTHORITY

Authority within the Company is delegated according to management responsibilities, job functions, and approved internal procedures.

Delegated authority ensures that operational decisions can be made efficiently while maintaining appropriate oversight and control.

Material decisions relating to regulatory matters, financial commitments, contractual obligations, technology changes, and strategic initiatives may require management approval or Board review depending on their significance.

The Company maintains segregation of duties wherever reasonably practicable to reduce operational risk and prevent conflicts of interest.

2.8 GOVERNANCE REPORTING

Management receives regular reports relating to:

- Financial performance.
- Operational performance.
- Technology operations.
- Product development activities.
- Information security matters.
- Compliance activities.
- Risk management.
- Human resources.
- Client onboarding and commercial activities.

These reports support informed decision-making and allow management to monitor the Company's performance against strategic objectives and regulatory obligations.

Periodic reviews are conducted to assess the effectiveness of governance arrangements, internal controls, and operational processes.

2.9 CONTINUOUS IMPROVEMENT

GameArt CU B.V. is committed to maintaining an effective governance framework that evolves alongside the Company's business activities, technological developments, and regulatory obligations.

Governance processes, reporting structures, and internal controls are reviewed periodically to ensure they remain appropriate, effective, and aligned with the Company's strategic objectives and compliance requirements.

Recommendations arising from audits, compliance reviews, risk assessments, operational incidents, or management reviews are incorporated into the Company's governance programme to support continuous improvement and organisational resilience.



Chapter 3

Business model and Operational Framework



CHAPTER 3 – BUSINESS MODEL AND OPERATIONAL FRAMEWORK

3.1 OVERVIEW

GameArt CU B.V. operates as a Business-to-Business (B2B) gaming technology provider, content supplier, and aggregation platform serving licensed gaming operators and industry partners.

The Company develops, hosts, distributes, and supports online gaming content through proprietary technology platforms and integration solutions. Through its operational framework, GameArt CU B.V enables licensed operators to access gaming content and technical services while maintaining control over game performance, infrastructure reliability, and content distribution.

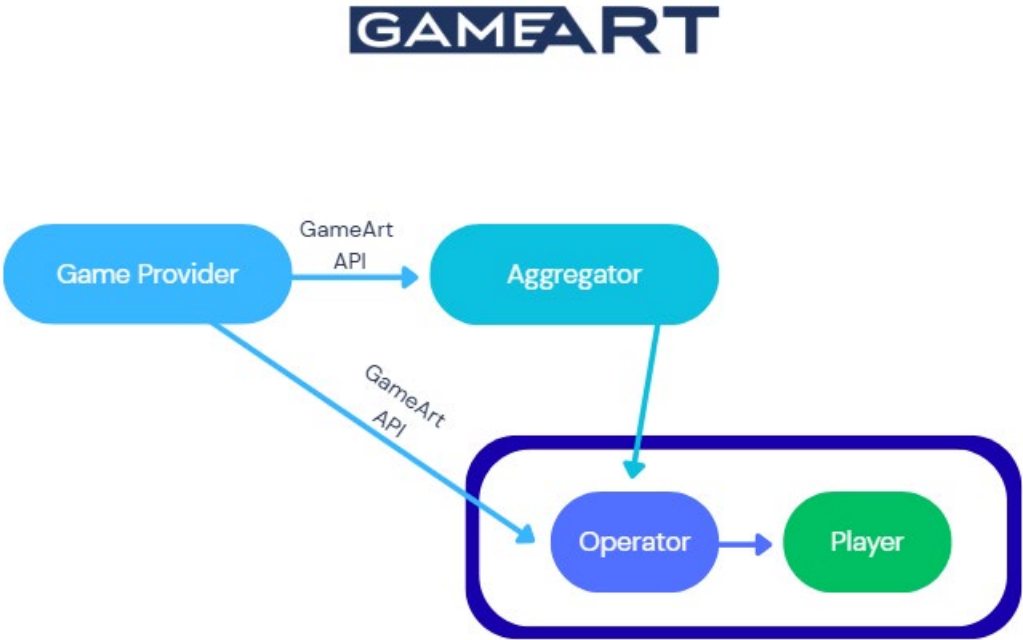
The Company's business model is designed to provide scalable and secure gaming solutions that support operators across multiple regulated and emerging markets.

3.2 OPERATIONAL MODEL

GameArt CU B.V operates as an intermediary technology and content provider positioned between gaming operators and the gaming content ecosystem.

The Company develops proprietary gaming content and distributes such content through its platform infrastructure. In addition, the Company may facilitate the aggregation and distribution of approved third-party content through its technology environment.

The GameArt CU B.V platform enables operators to access gaming content through secure integrations and standardised APIs, reducing implementation complexity and supporting efficient content delivery.



The architecture demonstrates the interaction between:

- Licensed gaming operators.
- GameArt CU B.V platform infrastructure.
- GameHub integration platform.
- Proprietary GameArt CU B.V content.
- Third-party gaming content providers.
- Supporting operational systems and infrastructure.

3.3 CORE BUSINESS ACTIVITIES

The Company's primary business activities include:

Game Development

GameArt CU B.V designs, develops, tests, certifies, and maintains proprietary online casino games for distribution to licensed operators.

Game development activities include:

- Concept creation.
- Mathematical modelling.
- Art and animation production.
- Software development.
- Quality assurance testing.
- Certification support.
- Product deployment.
- Ongoing maintenance.

Content Distribution

The Company distributes gaming content through its proprietary platform infrastructure.

Distribution services include:

- Content hosting.
- Content deployment.
- Content updates.
- Version management.
- Performance monitoring.
- Technical support.

Platform Integration Services

GameArt CU B.V supports the integration of gaming content through standardised APIs and technical onboarding processes.

Integration services include:

- API integration support.
- Technical documentation.
- Testing and certification support.
- Configuration management.
- Go-live support.
- Ongoing technical assistance.

Account Management Services

The Company maintains dedicated account management functions responsible for managing commercial relationships with operators and business partners.

Services include:

- Client onboarding.
- Commercial relationship management.
- Product promotion support.
- Performance reviews.
- Contractual coordination.
- Operational support.

3.4 CROSS-FUNCTIONAL DELIVERY MODEL

GameArt operates through a cross-functional operating model designed to support the complete lifecycle of gaming content from initial concept through development, certification, launch, live operations, and eventual retirement.

The delivery model brings together multiple departments and specialist functions, each contributing expertise throughout the product lifecycle. This collaborative structure ensures that products are developed in accordance with business objectives, technical requirements, quality standards, regulatory obligations, and commercial expectations.

Key departments involved in the product lifecycle include:

- Product Management
- Game Design
- Art and Animation
- Development
- Quality Assurance
- Compliance
- Account Management
- Customer and Technical Support
- Marketing
- Finance
- Executive Management

Cross-functional collaboration is coordinated through structured project governance, defined approval processes, project planning activities, and stage-gate reviews. Responsibilities are allocated according to departmental expertise and project requirements.

This operating model supports efficient product delivery while ensuring appropriate oversight, accountability, and risk management throughout the lifecycle of each product and service offered by the Company.

3.5 PRODUCT LIFECYCLE FRAMEWORK

The development and maintenance of gaming products follows a structured product lifecycle framework designed to ensure quality, compliance, consistency, and operational control.

The lifecycle consists of the following stages:

- Idea Generation.

- Planning.
- Project Kick-Off.
- Pre-Production.
- Production.
- Post-Production.
- Live Operations.
- End-of-Life Management.

Each stage includes defined deliverables, review points, approval requirements, and departmental responsibilities.

The product lifecycle framework ensures that gaming products are developed in a controlled manner and meet internal quality standards before release.

Detailed lifecycle procedures are described in Chapter 5 – Product Development and Content Lifecycle.

3.6 DEPARTMENTAL INTERACTION MODEL

The successful delivery of gaming products and services requires close cooperation between multiple operational departments.

Key operational departments include:

- Product Management.
- Delivery Management.
- Art and Animation.
- Development.
- GameHub Operations.
- Quality Assurance.
- Account Management.
- Customer Support.
- Compliance.
- Finance.
- Human Resources.

These departments operate within a coordinated framework supported by documented procedures, project management tools, escalation processes, and management oversight.

Cross-functional collaboration is embedded throughout the Company's operating model to ensure that projects are delivered efficiently and that operational risks are managed appropriately.

3.7 TECHNOLOGY-DRIVEN OPERATIONS

Technology forms the foundation of the Company's operational framework.

The Company relies upon:

- Proprietary gaming platforms.
- Integration APIs.
- Backend infrastructure.
- Monitoring systems.
- Development environments.
- Testing environments.

- Reporting systems.
- Security controls.

Operational activities are supported through specialised platforms including Jira, Confluence, Zendesk, monitoring tools, development platforms, and internal reporting systems.

Technology systems are monitored continuously to support performance, reliability, scalability, and information security objectives.

3.8 PERFORMANCE AND CONTINUOUS IMPROVEMENT

GameArt CU B.V maintains a culture of continuous improvement across all operational activities.

Operational performance is monitored through:

- Product performance metrics.
- Development KPIs.
- Platform availability metrics.
- Support performance indicators.
- Client satisfaction measures.
- Financial performance metrics.
- Compliance monitoring activities.

Lessons learned from incidents, audits, client feedback, product performance reviews, and operational assessments are incorporated into process improvements and strategic planning initiatives.

This approach supports the Company's commitment to operational excellence, innovation, and sustainable business growth.



Chapter 4

Client Onboarding and Account Management



CHAPTER 4 – CLIENT ONBOARDING AND ACCOUNT MANAGEMENT

4.1 PURPOSE

The purpose of this chapter is to establish the framework governing the onboarding, due diligence, integration, and ongoing management of GameArt CU B.V.'s business partners.

As a Business-to-Business gaming supplier, GameArt CU B.V maintains direct contractual relationships with licensed operators, aggregators, and other approved business partners. The onboarding process is designed to ensure that all clients are appropriately assessed prior to commencing a business relationship and that ongoing monitoring activities are performed throughout the duration of the relationship.

The Company applies a structured onboarding process combining commercial assessment, due diligence, risk assessment, contractual review, technical integration, and post-launch monitoring to ensure that all business relationships are established in a controlled and compliant manner.

4.2 CLIENT ONBOARDING FRAMEWORK

The client onboarding process consists of several sequential stages involving the Account Management, Sales, Compliance, Legal, Development, and Technical teams.

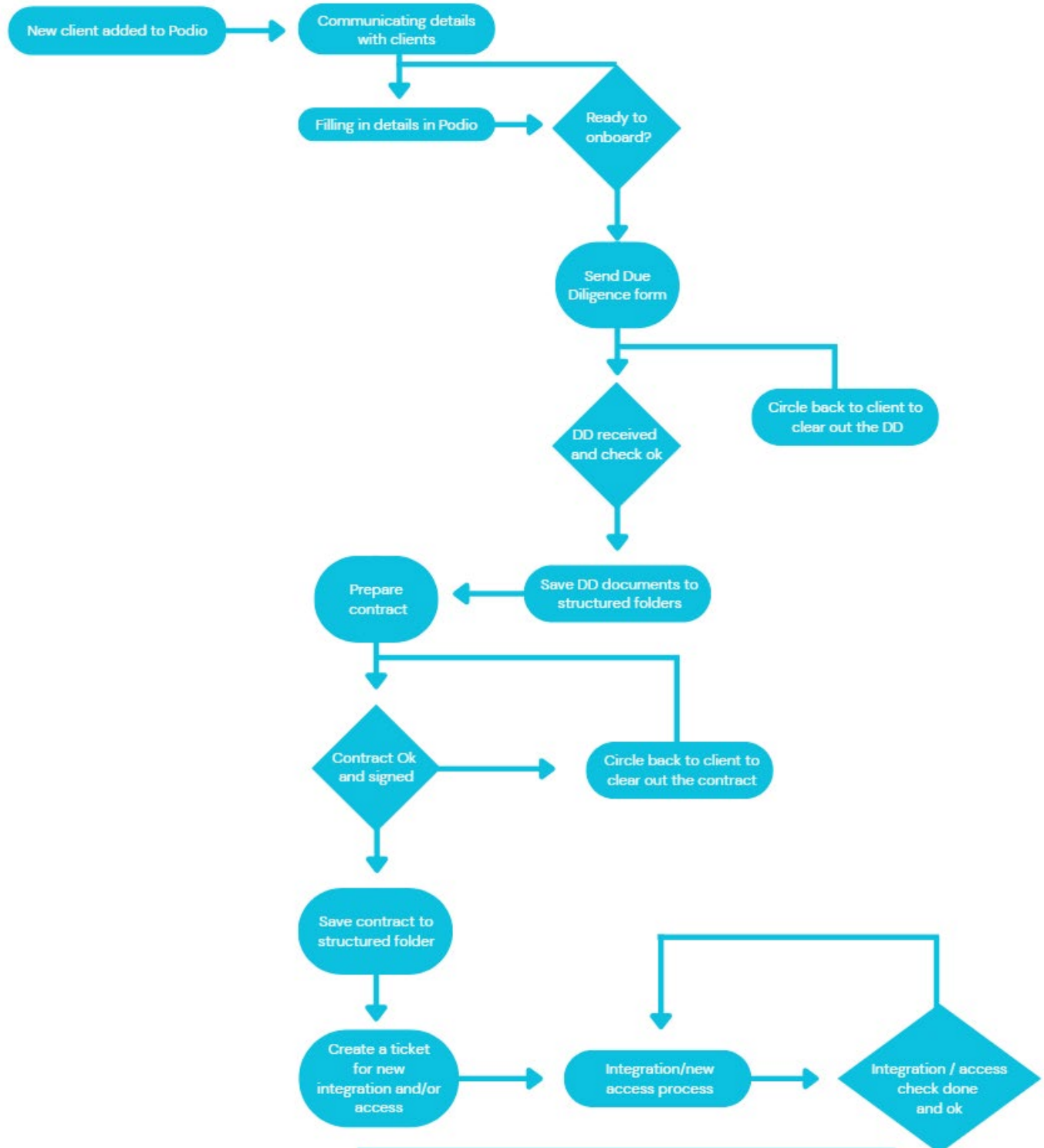
The onboarding framework is designed to:

- Verify the legitimacy of prospective clients.
- Assess regulatory and compliance risks.
- Establish commercial terms.
- Complete contractual arrangements.
- Facilitate technical integrations.
- Ensure operational readiness prior to go-live.

The onboarding process shall be completed before any gaming content, technical services, or platform access is made available to a client.

See diagram below.

GAMEART





4.3 CLIENT ACQUISITION AND COMMERCIAL ASSESSMENT

The onboarding process typically begins through the Account Management and Sales functions.

Prospective clients may be identified through:

- Business development activities.
- Industry events and conferences.
- Referrals.
- Strategic partnerships.
- Direct enquiries.

At the initial stage, Account Management and Sales personnel gather information relating to the prospective client, including:

- Corporate information.
- Licensing status.
- Jurisdictions of operation.
- Commercial requirements.
- Technical requirements.
- Expected business volumes.

All relevant information is recorded within the Company's customer relationship management systems.

Prior to progressing the onboarding process, commercial terms and strategic suitability are reviewed internally and discussed with management where required.

4.4 DUE DILIGENCE AND RISK ASSESSMENT

Once commercial discussions have reached an advanced stage, the prospective client is required to complete the Company's Due Diligence process.

The Due Diligence process is coordinated by the Compliance and Legal functions and is designed to assess the suitability of the prospective business relationship.

The due diligence review may include:

- Corporate registration verification.
- Ownership and beneficial ownership verification.
- Licensing verification.
- Regulatory history review.
- Sanctions screening.
- Adverse media screening.
- Jurisdictional assessment.
- Business activity review.
- Financial crime risk assessment.

In parallel with the Due Diligence review, a formal risk assessment is conducted to evaluate the overall risk profile of the prospective client.

Risk assessments consider factors including:

- Jurisdictional risk.
- Regulatory risk.
- Reputational risk.
- Operational risk.
- Financial crime risk.
- Commercial risk.

The completed risk assessment is documented and retained within the client's onboarding records.

4.5 WEBSITE AND COMPLIANCE REVIEW

As part of the onboarding process, Compliance and Legal personnel conduct a review of the prospective client's website and public-facing operations.

The review may include assessment of:

- Terms and Conditions.
- Privacy Policies.
- Responsible Gaming provisions.
- Licensing disclosures.
- Security controls.
- Regulatory notices.
- Complaint procedures.
- AML and compliance disclosures.

The purpose of the review is to ensure that the prospective client demonstrates appropriate operational and regulatory standards before a business relationship is established.

4.6 CONTRACTING AND COMMERCIAL APPROVAL

Following successful completion of the Due Diligence and Risk Assessment process, contractual documentation is prepared by the Legal and Compliance functions.

Agreements may include:

- Master Service Agreements.
- Content Distribution Agreements.
- Aggregation Agreements.
- Technical Service Agreements.
- Data Processing Agreements.
- Confidentiality Agreements.

The agreement is reviewed internally before being provided to the client for negotiation and execution.

No integration activities shall commence until all required agreements have been executed by the relevant parties.

4.7 TECHNICAL INTEGRATION

Following execution of the contractual documentation, responsibility for the onboarding process transitions to the Technical and Development functions.

The technical integration process may involve:

- API integrations.
- Platform configuration.
- Environment provisioning.
- User access creation.
- Authentication setup.
- Connectivity testing.
- Functional testing.
- Security validation.

Depending on the commercial arrangement, the integration may involve:

Standard Integration

The client integrates directly with GameArt CU B.V's API and platform infrastructure.

Custom Integration

GameArt CU B.V integrates with the client's infrastructure and technical environment through customised integration solutions.

Access credentials, technical documentation, and implementation guidance are provided to the client throughout the integration process.

4.8 GO-LIVE APPROVAL

Prior to launch, the Company performs final validation activities to ensure that all operational, technical, and contractual requirements have been satisfied.

The go-live review may include:

- Technical testing confirmation.
- Integration validation.
- Access verification.
- Commercial verification.
- Contractual confirmation.
- Operational readiness review.

Once all required approvals have been obtained, the client may be authorised to access production services and gaming content.

The deployment of content into the production environment is coordinated by the relevant technical teams in accordance with established deployment procedures.

4.9 CLIENT ACCOUNT MANAGEMENT

Following go-live, responsibility for the relationship is transferred to the Account Management function.

Account Managers serve as the primary point of contact for clients and are responsible for maintaining ongoing business relationships.

Responsibilities include:

- Commercial relationship management.
- Performance reviews.
- Client communications.
- Product updates.
- Commercial negotiations.
- Contract management.
- Escalation management.
- Client retention activities.

Account Managers work closely with Support, Product, Technical, Compliance, and Finance teams to ensure that client requirements are addressed effectively.

4.10 ONGOING MONITORING

Client relationships remain subject to ongoing monitoring throughout the lifecycle of the business relationship.

Monitoring activities include:

- Periodic Due Diligence reviews.
- Risk reassessments.
- Commercial reviews.
- Operational reviews.
- Technical monitoring.
- Compliance monitoring.
- Contractual reviews.

The frequency and scope of ongoing monitoring activities are determined according to the client's risk profile and applicable regulatory requirements.

Where material concerns are identified, the Company may implement additional controls, conduct enhanced reviews, or escalate matters to senior management.

4.11 CLIENT SUPPORT AND POST-LAUNCH ACTIVITIES

Following onboarding, clients receive ongoing support from Account Management, Technical Support, and Development teams.

Post-launch activities include:

- Daily traffic monitoring.
- Performance monitoring.
- Technical support.
- Incident management.
- Bug investigation and resolution.
- Product updates.
- Commercial reporting.
- Monthly performance reviews.

The objective of ongoing support activities is to maintain operational stability, maximise product performance, and strengthen long-term client relationships.

4.12 RECORD KEEPING

The Company maintains records relating to all onboarding and account management activities.

Records may include:

- Due Diligence documentation.
- Risk assessments.
- Contractual documentation.
- Integration records.
- Client communications.
- Performance reports.
- Compliance reviews.
- Monitoring activities.

Records are retained in accordance with applicable legal, regulatory, and operational requirements.

4.13 CONTINUOUS IMPROVEMENT

GameArt CU B.V. periodically reviews its onboarding and account management procedures to ensure that they remain effective, efficient, and aligned with regulatory expectations and business objectives.

Feedback from clients, operational teams, compliance reviews, audits, and post-implementation assessments is incorporated into process improvements and procedural enhancements.



Chapter 5

Product Development and Content Lifecycle



CHAPTER 5 – PRODUCT DEVELOPMENT AND CONTENT LIFECYCLE

5.1 PURPOSE

The purpose of this chapter is to establish the framework governing the development, delivery, maintenance, and retirement of gaming products within GameArt CU B.V.

The Company follows a structured product development lifecycle designed to ensure that all gaming content is developed in a controlled, consistent, and commercially effective manner while meeting applicable quality, technical, operational, and regulatory requirements.

The lifecycle framework promotes collaboration between Product Management, Delivery Management, Art, Development, Quality Assurance, Compliance, and Commercial teams throughout the entire product journey.

5.2 PRODUCT LIFECYCLE FRAMEWORK

GameArt manages product development through a structured Product Lifecycle Framework designed to ensure that all products progress through clearly defined stages of development, review, testing, certification, launch, and ongoing operational support.

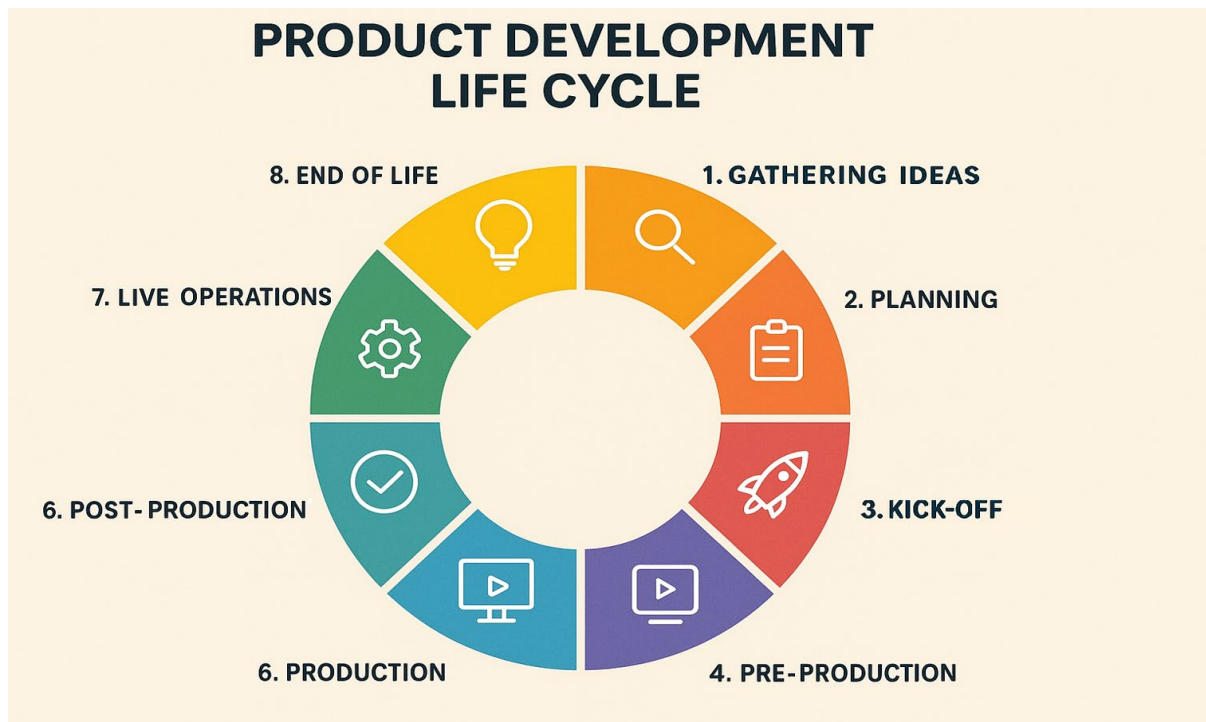
The lifecycle is governed through a stage-gate methodology whereby each phase contains defined deliverables, ownership responsibilities, approval criteria, risk assessments, and documented outputs prior to progression to the next stage.

The Product Lifecycle consists of the following stages:

1. Idea Generation
2. Idea Confirmation
3. Planning
4. Planning Confirmation
5. Project Kick-Off
6. Kick-Off Confirmation
7. Pre-Production
8. Production
9. Production Confirmation
10. Post-Production
11. Post-Production Confirmation
12. Live Operations
13. End-of-Life Management

Each stage is designed to ensure that commercial objectives, technical requirements, operational considerations, compliance obligations, and quality standards are reviewed before progression to the next phase.

The lifecycle framework supports consistency, accountability, transparency, and effective risk management across all product development activities.



5.3 IDEA GENERATION

The product lifecycle begins with the generation and evaluation of new product concepts.

Ideas may originate from:

- Product Management.
- Commercial teams.
- Market analysis.
- Client requests.
- Industry trends.
- Competitor analysis.
- Regulatory developments.
- Internal innovation initiatives.

Proposed concepts are evaluated based on:

- Commercial viability.
- Market demand.
- Development complexity.
- Resource requirements.
- Technical feasibility.
- Strategic alignment.

Concepts considered suitable for further development are progressed to the planning stage.

5.4 PLANNING PHASE

During the planning phase, Product Management prepares the initial project scope and business requirements.

Planning activities may include:

- Product vision definition.
- Market research.
- Functional requirements gathering.
- Commercial assessment.
- Resource estimation.
- Timeline development.
- Risk assessment.
- Preliminary technical review.

The planning phase establishes the foundation for the project and provides management with sufficient information to approve development activities.

5.5 PROJECT KICK-OFF

Following approval of the project proposal, a formal project kick-off is conducted.

The objective of the kick-off phase is to align all participating departments regarding:

- Project objectives.
- Scope.
- Deliverables.
- Milestones.
- Dependencies.
- Resource allocation.
- Responsibilities.

Representatives from Product, Development, Art, QA, Delivery, Commercial, and other relevant departments participate in the project initiation process.

Project documentation is created and maintained within the Company's project management systems.

5.6 PRE-PRODUCTION

The pre-production phase focuses on design and preparation activities prior to full-scale development.

Activities may include:

- Game mathematics design.
- Game mechanics development.
- User experience design.
- Wireframes and prototypes.
- Visual concept development.
- Technical architecture planning.
- Resource planning.
- Compliance and certification considerations.

The objective of pre-production is to validate the concept and ensure that all project requirements are clearly defined before development begins.

5.7 PRODUCTION PHASE

During production, the various development teams create the components required to deliver the final gaming product.

Key activities include:

Product Department

- Product oversight.
- Requirement management.
- Stakeholder coordination.
- Feature prioritisation.

Art Department

- Graphic design.
- Animation.
- Visual asset production.
- Audio coordination.

Development Department

- Software development.
- Backend development.
- Frontend implementation.
- Integration development.
- Game logic implementation.

Delivery Management

- Project coordination.
- Milestone tracking.
- Resource management.
- Progress reporting.

Throughout the production phase, progress is monitored through project management systems, regular status meetings, and internal reporting processes.

5.8 QUALITY ASSURANCE AND TESTING

Prior to release, all products undergo structured testing and validation procedures.

The Quality Assurance function is responsible for verifying that products operate as intended and meet internal quality standards.

Testing activities may include:

- Functional testing.
- Regression testing.
- User interface testing.
- Compatibility testing.
- Integration testing.

- Performance testing.
- Bug verification.
- Release validation.

Identified defects are documented, prioritised, assigned for remediation, and retested prior to release approval.

No product may proceed to launch until required testing activities have been completed and approved.

5.9 CERTIFICATION AND REGULATORY READINESS

Where required, products are submitted for independent testing and certification prior to market release.

Certification activities may include:

- RNG verification.
- Mathematical validation.
- Compliance testing.
- Security testing.
- Jurisdictional certification.

The Company maintains records of certifications and testing reports as part of its product governance framework.

Products are only released following successful completion of applicable certification requirements.

5.10 RELEASE AND DEPLOYMENT

Following successful testing and approval, products are prepared for deployment into the production environment.

Release activities may include:

- Deployment planning.
- Configuration validation.
- Production readiness reviews.
- Release approvals.
- Environment deployment.
- Launch monitoring.

The deployment process is coordinated between Development, Delivery, QA, GameHub, and Technical Operations teams.

All releases are documented and recorded within the Company's change management and deployment records.

5.11 LIVE OPERATIONS

Following launch, products enter the live operations phase.

During this stage, the Company monitors product performance and supports ongoing operational activities.

Monitoring activities include:

- Product performance reviews.
- Revenue analysis.
- Technical performance monitoring.
- Defect management.
- Client feedback review.
- Incident management.
- Feature enhancements.
- Content updates.

Live products remain subject to continuous monitoring to ensure operational stability and commercial effectiveness.

5.12 PRODUCT ENHANCEMENTS AND MAINTENANCE

The Company regularly reviews existing products to identify opportunities for improvement and optimisation.

Enhancement activities may include:

- Feature additions.
- Performance improvements.
- User experience updates.
- Regulatory updates.
- Technical optimisation.
- Client-driven improvements.

All modifications follow established development, testing, and deployment procedures.

5.13 END-OF-LIFE MANAGEMENT

Where a product is no longer commercially viable, technically sustainable, or strategically relevant, it may be retired.

End-of-life activities may include:

- Client notification.
- Product decommissioning.
- Infrastructure updates.
- Data retention reviews.
- Documentation updates.
- Contractual obligations review.

Product retirement decisions are reviewed and approved by the relevant stakeholders before implementation.

5.1.4 STAGE GATE GOVERNANCE AND APPROVAL PROCESS

GameArt applies a structured stage-gate governance framework throughout the Product Development Lifecycle to ensure that all products are developed in a controlled, consistent, and accountable manner.

The framework establishes formal review and approval points between each lifecycle phase. Before a project may progress to the next stage, the responsible stakeholders must verify that all required deliverables have been completed, identified risks have been assessed, and applicable quality, technical, commercial, and compliance requirements have been satisfied.

The stage-gate methodology supports effective project governance by ensuring that resources are allocated appropriately, development activities remain aligned with business objectives, and potential issues are identified and addressed at an early stage of the lifecycle.

Approvals may include product concept validation, business case assessment, resource allocation approval, technical feasibility reviews, quality assurance sign-off, compliance reviews, certification readiness assessments, and final release approvals.

Projects that do not meet the required criteria at a particular gate may be returned for further development, remediation, or review before progression to the subsequent phase is authorised.

GAMEART PRODUCT GOVERNANCE & DEVELOPMENT LIFECYCLE													
	1 GENERATING IDEAS	1a CONFIRM IDEAS	2 PLANNING	2a CONFIRM PLANNING	3 KICK-OFF	3a CONFIRM KICK-OFF	4 PRE- PRODUCTION	5 PRODUCTION	5a CONFIRM PRODUCTION	6 POST- PRODUCTION	6a CONFIRM POST- PRODUCTION	7 LIVE OPS	8 EOL
GOAL	Propose projects, prepare roadmap in line with market needs and resource availability. In order to be able to plan properly all ideas need to be explored in a way where each individual can share each his idea.	Confirm or deny certain idea further development/work.	Discuss the project scope (GDD) where Product Owner initiates the project with the team displaying vision, market context, Art and Animation Directors define the visual direction.	Confirm and confirmation of the roadmap and resource allocation.	The refined GDD is delivered with confirmed mechanics and flows. Art and Animation teams prepare visual direction aligned with GDD based on inputs.	Confirm success of the kick-off meeting. Confirm availability of team and officially define who is working on the project.	Working and feature complete products in everybody way are built by the heads of product and confirmed that work as expected.	Product is ready, QA confirms product readiness, commercial team launches marketing material and activities as prepared.	Product goes deployed across all planned channels. Product is being regularly monitored and potential issues are regularly and timely solved.	Product performance and satisfaction. Adjustments or polishing, translations and updates based on live feedback.	Product is monitored and improved in order to gain maximum impact with minimum impact.	Based on metric and strategy product comes to end of life.	
RESPONSIBLE (who is responsible to deliver work)	Everyone in the company	Steering team	Team leads + POs	Steering team	Production team who will work on the project - QA - compliance - marketing - delivery manager	Production team - product owner	Production team - product owner	Production team - PO - Head of Dev - Head of QA - Head of ART - Head of AM	Head of QA Head of Dev Head of PO Head of ART Head of AM	Commercial team - BB team - IT Operations - support team - production team (Bug fixing)	Commercial team	Steering team	
ACCOUNTABLE (owner - who manages this step)	Product head (if idea other than product existed, then other owner applicable)	Steering team	Delivery manager	Delivery manager	Product owner	Product owner	Delivery manager	Product owner	Delivery manager	Delivery manager	Delivery manager	Steering team	
CONSULTED (who gives additional info or help)	Steering team	Idea originator - team leads	All teams	Team leads	Team leads	Team leads	Team leads	Team leads	Team leads	Team leads	Team leads	Production team - compliance	
INFORMED (who is informed)	CEO	All employees	CEO	All employees	All employees	All employees	Team leads - marketing - CEO	Team leads - marketing - CEO	Production team - CEO	CEO	All employees	All employees	All employees
KEY DELIVERABLES	- Idea register including info for general understanding (what, how, why), impact assessment	- clear idea description - clear validated request of the idea on the business/company roadmap - initiative creation	- clear project pitch (what is it & benefits of GART) - roadmap of the project (as part of the pitch) - effort estimation - roadmap - communication team leads on the delivery	- confirmed roadmap - tasks based on confirmed checklist - clear description of GDD phases - team leads on the delivery	- GDD definition of done within GDD - main feedback - Dev feedback - Art & Anim cases - Audio files - definition who is the team	- refined estimations - team commitment - task breakdown - GDD	- clearly defined GDD - Art brief - Anim concept - sound concept - dev directions - dependency list	- finished product ready for internal test - Art - final GDD - final GDD - final GDD - marketing brief	- confirmation of the finished product	- finished QA checklist and bug control documentation - final Marketing strategy - product launch strategy - confirmation of key and necessary compliance certification after product testing for all and the team	- confirmation of product readiness signed off by QA - Product Dev leads - marketing activity plan - integration of new clients - ideas for optimisation	- regular performance reports - regular promotion plan - marketing activity plan - integration of new clients - ideas for optimisation	- performance report - confirmation for customers - working at product related docs, materials, etc.
PASS CRITERIA	- clear idea description - high enough impact of the idea		- clear requirements confirmed by team - clear commitment of teams leads to deliver the planned work		- Clear GDD and confirmed by production team - clear alignment on the tasks that needs to be performed			- fully functional product confirmed by product team		- fully functional product, signed off by QA and by Product			
TOOLS & SOURCES	Jira Product Discovery	Jira Product Discovery	Jira Product Discovery - planning tool	Jira - Confluence - Art tools	Jira - Confluence	Jira - Confluence - Art tools - dev tools - deployment tools	Jira - Confluence - Art tools - dev tools - deployment tools	Jira - Confluence	Jira - Confluence - Art tools - dev tools - deployment tools	Jira - Confluence	Jira - Confluence	Jira - Confluence	Jira - Confluence
RISKS	- Idea does not have a big enough impact to be taken for a further consideration - Idea is "to big" to fit the roadmap in near future		- Product input not providing all key info - over committing across overlapping		- confirmed kick-off with not clear GDD - missing information in GDD			- confirming production when product not fully functional - confirming production with missing elements in the product		- confirming product with quality issues - confirming product with missing content/elements			
CONTROL POINTS	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆	◆
CHECKLIST (TBD)	add link for "how to" in Jira discovery		- GDD checklist + GDD template - delivery checklist + project structure (everything in Jira, shared project folder, all environments for dev and art...) - make sure Jira tasks warns us of as soon as GDD is clear enough					- finished product checklist (dev, art, anim, sound, translations, ...) - pre deploy / mid-deploy checklist - make sure we warn on Lucas/Amos - handle this in the production		- deployment checklist - product launch and marketing checklist		- AM promo activities directory checklist	
LEGEND	◆ CONTROL POINT / GATE Approval required to proceed to next phase ◆ MULTI-DISCIPLINARY INVOLVEMENT Collaboration across teams at every stage 📄 DOCUMENTATION & CHECKLISTS Required deliverables and checklist per stage 🛡️ QUALITY & RISK CONTROL Risks identified and mitigated at each control point 📈 CONTINUOUS IMPROVEMENT Performance monitored and optimised in Live Ops NOTE This framework ensures structured governance, clear accountability and quality delivery throughout the full product lifecycle.												

The Product Governance Stage-Gate Framework provides visibility over the complete lifecycle of a product and clearly defines the key approval milestones that govern progression through development, testing, release, and operational management.

The framework ensures that each stage is subject to appropriate oversight and that decisions are supported by documented deliverables, stakeholder reviews, and management approvals. This governance model promotes transparency, accountability, quality assurance, and continuous improvement across all product development activities.

In addition to formal approval gates, each lifecycle stage includes defined objectives, expected outputs, risk considerations, and quality control measures designed to support the successful delivery of products and services.

Departmental Responsibilities and Lifecycle Ownership

The Product Development Lifecycle is supported by a cross-functional operating model involving Product Management, Development, Art and Animation, Mathematics, Quality Assurance, Compliance, Marketing, Support, Commercial, and Management functions.

Responsibilities are allocated according to departmental expertise and vary throughout the lifecycle depending on the nature of the activities being performed. Departments collaborate throughout the development process to ensure that products meet commercial objectives, technical specifications, regulatory requirements, quality standards, and customer expectations.

This multidisciplinary approach enables effective coordination between business, technical, operational, and compliance functions while maintaining clear accountability for deliverables and decision-making throughout the lifecycle.

GAMEART PRODUCT DEVELOPMENT – DEPARTMENTAL RESPONSIBILITIES BY STAGE													
	1 GENERATING IDEAS	1a CONFIRM IDEAS	2 PLANNING	2a CONFIRM PLANNING	3 KICK-OFF	3a CONFIRM KICK-OFF	4 PRE-PRODUCTION	5 PRODUCTION	5a CONFIRM PRODUCTION	6 POST-PRODUCTION	6a CONFIRM POST-PRODUCTION	7 LIVE OPS	8 EOL (END OF LIFE)
ART, ANIMATION & SOUND	- Evaluate game concepts - Art & animation ideas - Sound design ideas	- Review ideas - Art direction validation	- Define art style - Asset planning - Concept art	- Confirm art style - Resource needs - Asset pipeline	Art & animation team briefing	Art direction confirmed	- Create game art - Animation tests - Sound prototype	- Create all assets - Animations, UI - Sound production	- QA review of assets - Final art & sound sign-off	- Polish assets - Final optimisations - Translations support	Final art & sound approval	- Updates, new content - Visual optimisations	- Archive assets - Final handover
PRODUCT & MATHEMATICS	- Game concept - Game mechanics - Payout model ideas	- Confirm concept - Business case	- Define game rules - RTP & math model - Volatility analysis	- Confirm rules - Risk review - Model sign-off	- Product briefing - Technical scope	Product scope confirmed	- Build math model - Feature planning	- Implement math - Balance & tuning	- QA review - Math sign-off	- Final balance check - Model validation	Final math approval	- Monitor performance - Analyse metrics	Final performance review
FRONT END DEVELOPMENT	- Technical feasibility - Platform review	Confirm tech feasibility	- Architecture design - Tech requirements	- Confirm tech plan - Resource plan	Dev team alignment	Dev plan confirmed	- Engine setup - Prototypes	- Full development - Feature integration	- QA verification - Build sign-off	- Bug fixes - Optimisation	Final build approval	- Maintenance - Feature updates	- Archive build - Close activities
QA	- Initial QA input - Risk identification	Concept QA review	- Test strategy - Risk assessment	QA plan approval	Test planning kick-off	QA resources confirmed	- Test cases - Test data prep	- Functional testing - Regression testing	QA sign-off (quality gate)	- Final testing - Certification	Release approval	- Live monitoring - Issue tracking	- Final QA report - Close QA
SUPPORT	Early support considerations	Support scope review	- Define support needs - Player experience	Support plan confirmed	Support team briefing	Support plan confirmed	- Prepare support docs - Knowledge base	- Monitor internal tests - Support feedback	Support readiness confirmation	Final content & FAQ update	Go-live readiness	24/7 player support - Issue escalation	- Handover - Close support
REVENUE & MONETIZATION	- Monetisation ideas - Revenue potential	Revenue model review	- Define model - Economy planning	Monetisation approval	Economy setup planning	Revenue plan confirmed	- Economy tests - Balance checks	- Monitor economy - Adjust & optimise	Economy QA confirmation	Final economy validation	Go-live economy approval	- Revenue monitoring - Optimisation	Final revenue analysis
COMPLIANCE	- Regulatory review - Jurisdiction check	Compliance requirements	Certifications needed	Compliance plan approved	Compliance kick-off	Compliance confirmed	Early compliance checks	Ongoing compliance validation	Compliance sign-off	Final compliance certification	Certification approval	Ongoing compliance monitoring	Final compliance closure
COMMERCIAL	Market opportunity assessment	Commercial validation	- Business case - Pricing strategy	Commercial plan approval	Commercial alignment	Commercial plan confirmed	Content positioning review	Commercial review of product progress	Commercial acceptance	Final commercial review	Go-live commercial OK	- Commercial updates - Promotions	Final commercial review
MARKETING	Initial marketing opportunities	Market validation check	- Marketing strategy - Audience analysis	Marketing plan approval	Go-to-market planning	Marketing plan confirmed	Marketing materials prep	- Campaign planning - Content creation	Pre-launch approval	Final campaign optimization	Launch execution	- Ongoing campaigns - Promotions	Campaign close-out
EXECUTIVE	- Strategic input - High-level review	Concept approval	- Strategic review - Resource allocation	Planning approval	Executive sign-off	Kick-off confirmation	Review roadmap & risks	Progress review & decisions	Production approval	Release approval	Go-live approval	Performance review & decisions	EOL decision & approval
GENERAL	Idea generation from all teams	Idea viability review	Cross-team planning	Plan alignment confirmation	Team alignment meeting	Cross-team confirmation	Cross-team preparation	Daily stand-ups & collaboration	Cross-team verification	Final cross-team review	Launch alignment	Cross-team updates & reporting	Project closure review
KEY DELIVERABLES													
Concepts • Roadmaps • GDD Definitions • Art & Audio Assets Math Models • Prototypes • Builds • Test Reports • Certification Marketing Assets • Launch Materials • Player Support Docs													
QUALITY & APPROVAL GATES													
Each stage requires defined deliverables, reviews and approvals before moving to the next stage to ensure quality, compliance and commercial success.													
NOTE													
This framework ensures clear accountability, collaboration, quality control and alignment across all departments throughout the full product lifecycle.													

The departmental responsibility framework establishes clear ownership for activities, deliverables, approvals, and supporting tasks throughout the Product Development Lifecycle.

The framework ensures that all relevant stakeholders are involved at the appropriate stages and that responsibilities are clearly defined for planning, development, testing, certification, launch, operational support, and product retirement activities.

Detailed operational procedures, project documentation requirements, checklists, approval records, and supporting governance artefacts are maintained by the Product Department and are reviewed periodically to ensure continued alignment with business objectives, regulatory obligations, and product quality standards.

5.15 PRODUCT DOCUMENTATION FRAMEWORK

Throughout the Product Lifecycle, GameArt maintains documentation to support planning, development, testing, certification, launch, and operational management activities.

Documentation may include:

- Product Pitch Documents.
- Game Design Documents (GDDs).
- Product Requirement Specifications.
- Technical Design Documents.
- Mathematical Models and Game Logic Documentation.
- Art and Animation Specifications.
- Audio Design Specifications.
- Quality Assurance Documentation.
- Certification Documentation.
- Launch Plans.
- Marketing Briefs.
- Post-Launch Performance Reports.

Documentation requirements vary according to the nature and complexity of the project.

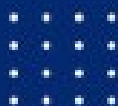
The maintenance of accurate and up-to-date documentation supports effective governance, knowledge sharing, quality assurance, audit readiness, and regulatory compliance throughout the product lifecycle.

5.16 CONTINUOUS IMPROVEMENT

GameArt CU B.V. is committed to continuously improving its product development practices.

Lessons learned from completed projects, product launches, client feedback, incidents, audits, and operational reviews are incorporated into future projects and development methodologies.

The Company regularly reviews its lifecycle framework to ensure alignment with industry best practices, technological developments, and changing market requirements.



Chapter 6

GameHub Operations and Platform Management



CHAPTER 6 – GAMEHUB OPERATIONS AND PLATFORM MANAGEMENT

6.1 PURPOSE

The purpose of this chapter is to establish the operational framework governing the GameHub Department and the management of the Company's core integration platform.

GameHub serves as the central technology layer connecting external gaming content providers, operator clients, and internal systems. The platform enables the secure exchange of gaming transactions, content distribution, integration services, and real-time communications between multiple stakeholders within the gaming ecosystem.

The GameHub Department is responsible for maintaining platform stability, ensuring integration reliability, supporting scalability, and safeguarding the integrity of the Company's core infrastructure.

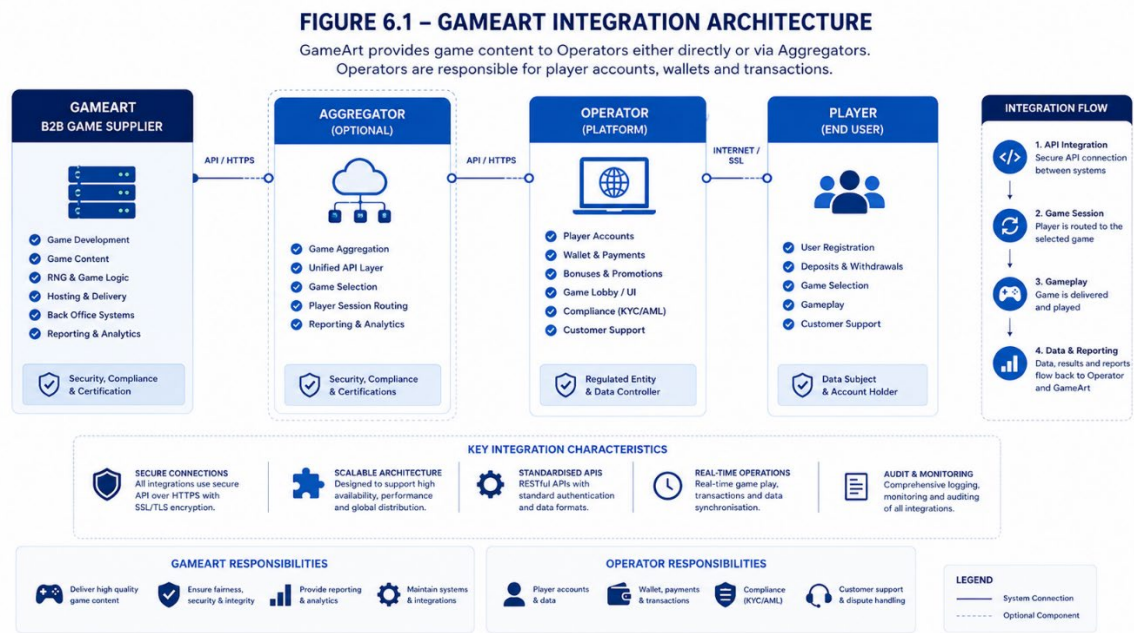
6.2 OVERVIEW OF GAMEHUB

GameHub is the Company's central integration platform and forms a critical component of the overall technology environment.

The platform acts as a gateway between:

- Licensed gaming operators.
- Third-party game providers.
- Proprietary GameArt CU B.V gaming content.
- Internal backend systems.
- Reporting and monitoring services.
- Technical support functions.

The platform is designed to support high transaction volumes, real-time communications, and continuous availability while maintaining appropriate security and operational controls.



The architecture enables the Company to manage content delivery, integration services, transaction routing, and operational monitoring through a unified technology environment.

6.3 DEPARTMENT STRUCTURE

The GameHub Department consists of a specialised technical team focused on platform architecture, backend services, integrations, and performance optimisation.

The department consists of:

Team Lead / Solution Architect

The Team Lead is responsible for:

- Technical strategy.
- System architecture.
- Platform design.
- Technology governance.
- Technical decision-making.
- Cross-department coordination.

Senior Backend Developers

Senior Backend Developers are responsible for:

- Core platform development.
- API development and maintenance.
- Integration management.
- Performance optimisation.
- Troubleshooting and issue resolution.
- Technical enhancements.

The department currently operates with a lean structure designed to provide focused expertise and rapid decision-making while maintaining high technical standards.

6.3.1 PURPOSE AND RESPONSIBILITIES

The Game Hub Department is responsible for maintaining the operational stability, availability, monitoring, and technical performance of the GameArt platform. The department supports the Company's gaming operations by overseeing platform health, incident response, release coordination, integration monitoring, backup processes, and technical service continuity.

The department works closely with Development, QA, Technical Support, Compliance, and Product teams to ensure that systems remain available, secure, and performant.



6.4 OPERATIONAL RESPONSIBILITIES

The GameHub Department is responsible for the operation, maintenance, and enhancement of the Company's core integration platform.

Key responsibilities include:

- Platform architecture management.
- API gateway management.
- Integration services.
- Backend framework development.
- Transaction routing.
- Performance optimisation.
- Platform scalability.
- Infrastructure coordination.
- Monitoring and diagnostics.
- Technical support escalation.
- System stability management.

The department works closely with Development, Product, Technical Support, Account Management, and Infrastructure teams to ensure the continuous availability of platform services.

6.5 INTEGRATION MANAGEMENT

GameHub serves as the primary integration layer between external business partners and the Company's technology environment.

Integration activities include:

- Operator integrations.
- Content provider integrations.
- API configuration.

- Authentication setup.
- Environment provisioning.
- Technical validation.
- Connectivity testing.
- Integration support.

All integrations follow documented onboarding, testing, and deployment procedures to ensure stability and consistency.

Prior to deployment into production, all integrations are tested within controlled environments to verify functionality, security, and performance requirements.

6.6 API AND TRANSACTION PROCESSING

The GameHub platform manages the secure transmission of requests and responses between connected systems.

Platform services include:

- Session management.
- Authentication services.
- API request processing.
- Transaction routing.
- Error handling.
- System messaging.
- Data synchronisation.

The platform is designed to process high volumes of gaming transactions while maintaining low latency and high availability.

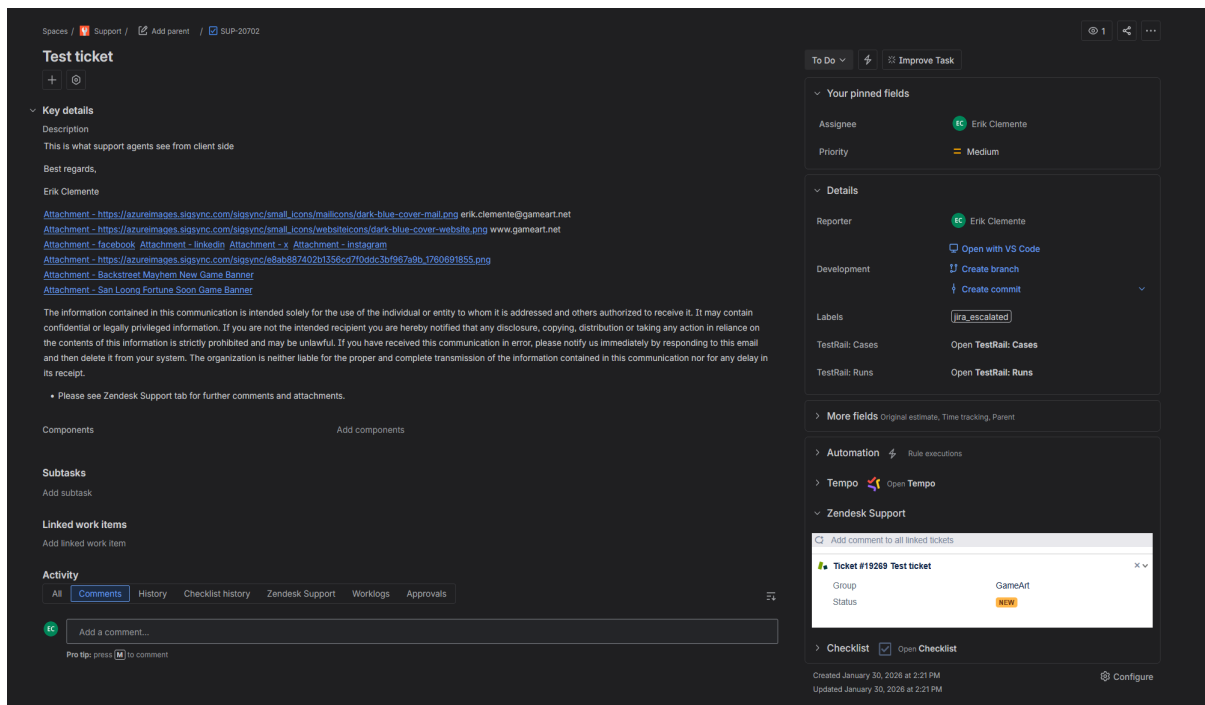


Fig 6.3 - Example of the Company's incident management and issue-tracking environment used to record, assign, investigate, escalate, and resolve technical and operational incidents.

Monitoring systems continuously track platform performance and transaction processing activities to identify potential issues before they impact clients.

6.7 PLATFORM STABILITY AND PERFORMANCE MANAGEMENT

Maintaining platform stability is a core responsibility of the GameHub Department.

The team continuously monitors:

- Platform availability.
- API response times.
- Transaction throughput.
- System latency.
- Resource utilisation.
- Error rates.
- Integration performance.

Performance data is reviewed regularly to identify opportunities for optimisation and capacity planning.

Where performance degradation is identified, corrective actions are implemented through established incident management and change management procedures.

6.8 MONITORING AND OPERATIONAL OVERSIGHT

The GameHub platform is supported by a range of monitoring and diagnostic tools designed to provide visibility across the technology environment.

Monitoring activities may include:

- Infrastructure monitoring.
- Service monitoring.
- API monitoring.
- Log analysis.
- Transaction monitoring.
- Alert management.
- Capacity monitoring.

Alerts are reviewed and investigated by the appropriate technical teams to ensure timely identification and resolution of operational issues.

Monitoring information supports both operational management and strategic planning activities.

6.9 CHANGE MANAGEMENT

Changes affecting the GameHub platform are managed through formal development and deployment procedures.

Changes may include:

- Platform enhancements.
- Integration updates.
- Configuration changes.
- Performance improvements.
- Security updates.

- Infrastructure modifications.

All changes are subject to testing, review, approval, and deployment controls designed to minimise operational risk and maintain service stability.

Where required, stakeholders are notified in advance of significant changes that may affect platform functionality or client integrations.

6.10 INCIDENT MANAGEMENT AND ESCALATION

The GameHub Department plays a central role in the identification, investigation, and resolution of platform-related incidents.

Examples of incidents include:

- API failures.
- Integration disruptions.
- Transaction processing issues.
- Connectivity failures.
- Performance degradation.
- Service outages.
- Data synchronisation errors.

Upon identification of an incident, the team shall assess the impact, determine the root cause, implement containment measures where appropriate, and coordinate resolution activities with the relevant departments.

Significant incidents shall be escalated in accordance with the Company's Incident Management and Business Continuity Framework.

6.11 KNOWLEDGE MANAGEMENT AND DOCUMENTATION

The GameHub Department maintains technical documentation to support operational resilience and knowledge sharing.

Documentation may include:

- System architecture documentation.
- API specifications.
- Integration guides.
- Operational procedures.
- Troubleshooting guides.
- Change records.
- Incident reports.

Documentation is reviewed and updated periodically to ensure accuracy and relevance.

The department promotes knowledge sharing and collaboration to reduce key-person dependency and strengthen organisational resilience.

6.12 PERFORMANCE METRICS AND KPIS

The performance of the GameHub Department is measured through operational and technical indicators designed to support platform reliability and continuous improvement.

Key performance objectives include:

- Platform availability and uptime.
- API performance and response times.
- Transaction processing efficiency.
- Integration delivery timelines.
- Incident resolution effectiveness.
- Code quality and maintainability.
- System scalability.
- Knowledge sharing and documentation quality.

Performance metrics are reviewed periodically by management to identify opportunities for improvement and support strategic planning.

6.13 TECHNOLOGY EVOLUTION AND INNOVATION

The Company is committed to continuously improving the GameHub platform through innovation, optimisation, and adoption of modern technologies.

The GameHub Department regularly evaluates:

- Emerging technologies.
- Development frameworks.
- Platform architecture improvements.
- Performance enhancement opportunities.
- Security improvements.
- Scalability initiatives.

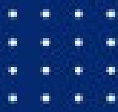
Technology investments are assessed against operational requirements, business objectives, and long-term strategic goals.

6.14 CONTINUOUS IMPROVEMENT

GameArt CU B.V. maintains a continuous improvement culture across all GameHub activities.

Lessons learned from incidents, integrations, audits, client feedback, and operational reviews are incorporated into platform enhancements and process improvements.

This approach ensures that the GameHub platform remains scalable, secure, efficient, and aligned with the Company's growth objectives and operational requirements.



Chapter 7

Technology

Infraestructure and

Information Security



CHAPTER 7 – TECHNOLOGY INFRASTRUCTURE AND INFORMATION SECURITY

7.1 PURPOSE

The purpose of this chapter is to establish the framework governing the management, security, operation, and monitoring of the Company's technology infrastructure and information assets.

GameArt CU B.V. relies upon secure and resilient technology systems to support the development, distribution, integration, and operation of gaming content and platform services. The Company maintains a comprehensive framework of technical, organisational, and security controls designed to protect its systems, data, and business operations from unauthorised access, disruption, misuse, and cyber threats.

The framework supports operational stability, regulatory compliance, information security, and business continuity objectives.

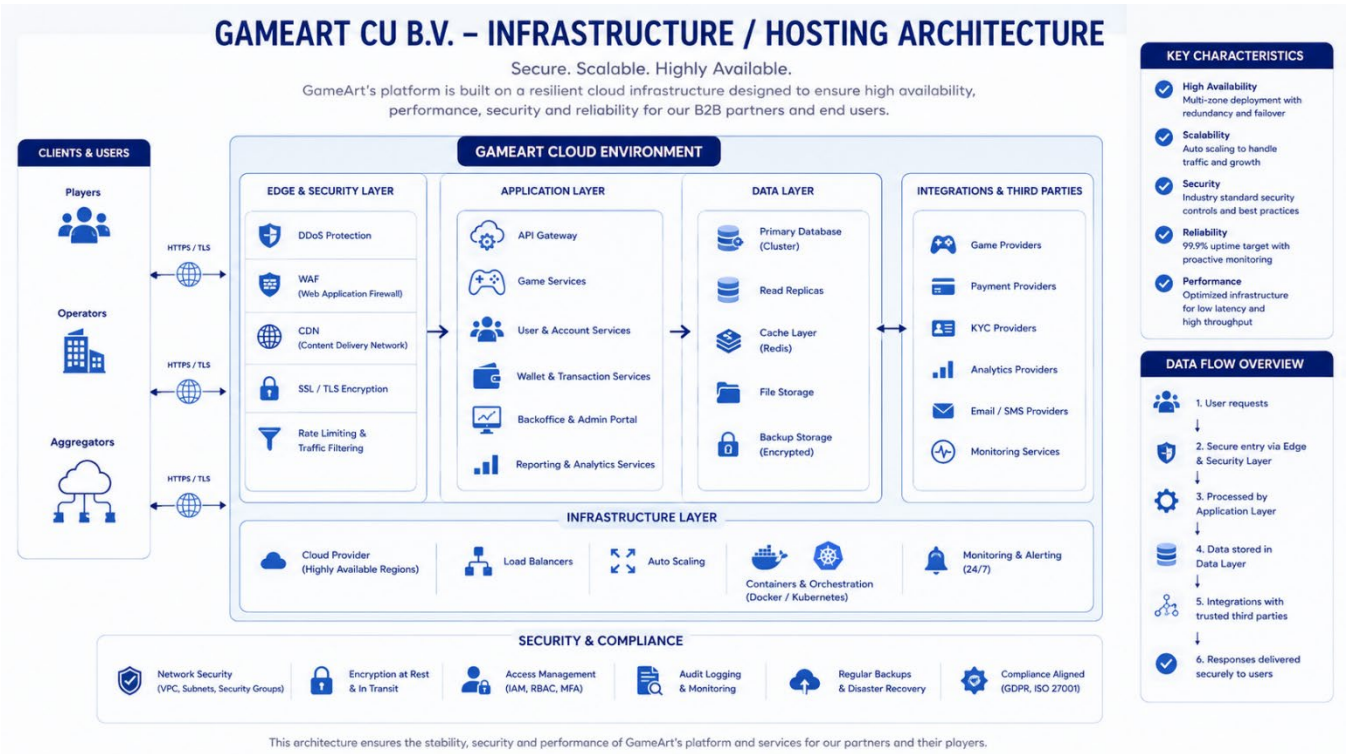
7.2 TECHNOLOGY INFRASTRUCTURE OVERVIEW

The Company's technology environment consists of interconnected systems supporting game development, platform operations, integrations, monitoring, support services, and business functions.

Core infrastructure components include:

- Production environments.
- Development environments.
- Testing environments.
- Integration services.
- API gateways.
- Database infrastructure.
- Monitoring systems.
- Security systems.
- Backup and recovery services.

The infrastructure is designed to support high availability, scalability, operational resilience, and secure service delivery.



Infrastructure design is periodically reviewed to ensure that capacity, performance, and security requirements continue to support business growth and operational demands.

7.3 INFRASTRUCTURE HOSTING

GameArt CU B.V utilises professionally managed hosting and data centre facilities to support its operational environment.

The Company's hosting model is designed to provide:

- Physical security.
- Environmental protection.
- Network redundancy.
- Power redundancy.
- Secure connectivity.
- Operational resilience.

Physical access to hosting facilities is restricted to authorised personnel and controlled through the data centre provider's security procedures.

Logical and administrative access remains under the control of authorised GameArt CU B.V personnel.

7.4 TECHNOLOGY GOVERNANCE

Technology activities are overseen by the Chief Technology Officer (CTO), who is responsible for ensuring that infrastructure, software development, information security, and platform operations remain aligned with the Company's strategic objectives and operational requirements.

Technology governance responsibilities include:

- Technology strategy.
- Infrastructure oversight.
- Development governance.
- Security governance.
- Capacity planning.
- Technology risk management.
- Vendor oversight.
- Operational resilience.

The CTO works closely with Product, GameHub, Compliance, and Executive Management to ensure the effectiveness of the Company's technology framework.

7.5 INFORMATION SECURITY FRAMEWORK

The Company maintains an Information Security Framework designed to protect the confidentiality, integrity, and availability of information assets and technology systems.

The framework is based upon the following principles:

Confidentiality

Information shall only be accessible to authorised individuals with a legitimate business need.

Integrity

Information shall be protected against unauthorised modification, corruption, or destruction.

Availability

Systems and services shall remain available to authorised users when required to support business operations.

Accountability

All users are accountable for activities performed under their assigned credentials and access privileges.

The Information Security Framework is supported by technical controls, organisational measures, employee awareness programmes, and ongoing monitoring activities.

7.6 ACCESS CONTROL AND AUTHENTICATION

Access to systems, applications, databases, infrastructure, and administrative tools is restricted according to business requirements and the principle of least privilege.

Access management controls include:

- Role-based access controls (RBAC).
- User account management.
- Multi-factor authentication (MFA).
- VPN access controls.
- Password complexity requirements.
- Periodic access reviews.
- Access logging and monitoring.

Access rights are granted based on job responsibilities and are reviewed periodically to ensure that permissions remain appropriate.

Access privileges are removed or adjusted promptly when employees change roles or leave the organisation.

7.7 DEVELOPMENT AND CHANGE MANAGEMENT

Changes affecting production systems, applications, infrastructure, or integrations are managed through controlled development and deployment procedures.

The Company's change management framework includes:

- Change requests.
- Development activities.
- Code reviews.
- Testing and validation.
- Approval processes.
- Deployment controls.
- Post-deployment monitoring.

All significant changes are documented and tracked through approved project management and ticketing systems.

The objective of change management is to minimise operational risk while supporting innovation and continuous improvement.

7.8 DATA MANAGEMENT AND PROTECTION

The Company processes and stores operational, technical, commercial, and business information required to support its activities.

Data protection controls include:

- Access restrictions.
- Encryption where appropriate.
- Secure transmission protocols.
- Data segregation.
- Backup controls.
- Data retention procedures.

The Company implements appropriate safeguards to prevent unauthorised access, disclosure, modification, or destruction of information.

Where personal data is processed, the Company applies appropriate privacy and data protection measures in accordance with applicable legal and regulatory requirements.

7.9 MONITORING AND LOGGING

Technology systems are continuously monitored to support operational stability, performance management, security oversight, and incident detection.

Monitoring activities include:

- Infrastructure monitoring.
- Application monitoring.
- API monitoring.
- Service availability monitoring.
- Capacity monitoring.
- Security monitoring.
- Log analysis.

Monitoring tools provide visibility into system performance and generate alerts where predefined thresholds or anomalies are detected.

Operational and security logs are retained in accordance with internal retention requirements and may be reviewed during investigations, audits, incident reviews, and compliance assessments.

7.10 VULNERABILITY AND SECURITY MANAGEMENT

The Company maintains processes for identifying, assessing, and mitigating security vulnerabilities.

Security management activities may include:

- Vulnerability assessments.
- Security testing.
- Patch management.
- Software updates.
- Configuration reviews.
- Security monitoring.
- Threat intelligence reviews.

Identified vulnerabilities are assessed according to their severity and remediated within appropriate timeframes.

Where significant risks are identified, escalation procedures are initiated to ensure timely remediation.

7.11 THIRD-PARTY TECHNOLOGY PROVIDERS

The Company relies upon selected third-party providers for infrastructure, software, monitoring, communication, and business support services.

Third-party relationships are managed through:

- Due diligence reviews.
- Contractual controls.
- Security assessments.
- Performance monitoring.
- Service reviews.

The Company seeks to ensure that third-party providers maintain security and operational standards appropriate to the services they deliver.

7.12 INCIDENT DETECTION AND RESPONSE

Technology-related incidents are managed through established incident management procedures.

Examples of incidents include:

- System outages.
- Infrastructure failures.
- Security events.
- Performance degradation.
- Unauthorised access attempts.
- Service disruptions.

Upon identification of an incident, the appropriate technical teams investigate the issue, assess potential impact, implement containment measures where necessary, and coordinate recovery activities.

Significant incidents are escalated in accordance with the Company's Incident Management and Business Continuity Framework.

7.13 BACKUP AND RECOVERY

The Company maintains backup procedures designed to support operational resilience and recovery capabilities.

Backup activities may include:

- Database backups.
- System backups.
- Configuration backups.
- Application backups.
- Documentation backups.

Backups are periodically reviewed and tested to verify their effectiveness and support recovery objectives.

Recovery procedures are maintained to minimise downtime and support the restoration of critical services following operational disruptions.

7.14 TECHNOLOGY RISK MANAGEMENT

Technology risks are identified, assessed, monitored, and managed as part of the Company's overall Risk Management Framework.

Examples of technology risks include:

- Cybersecurity threats.
- Infrastructure failures.
- Capacity constraints.
- Third-party service disruptions.
- Software defects.
- Operational errors.

Technology risk assessments support management decision-making and help prioritise mitigation activities.

7.15 CONTINUOUS IMPROVEMENT

GameArt CU B.V. is committed to continuously improving its technology environment, security controls, and operational capabilities.

Lessons learned from incidents, audits, vulnerability assessments, operational reviews, client feedback, and technology evaluations are incorporated into ongoing improvement initiatives.

This approach supports the Company's objectives of maintaining a secure, resilient, scalable, and high-performing technology environment capable of supporting long-term business growth.



Chapter 8

Customer and Technical Support Operations



CHAPTER 8 – CUSTOMER AND TECHNICAL SUPPORT OPERATIONS

8.1 PURPOSE

The purpose of this chapter is to establish the framework governing Customer Support and Technical Support operations within GameArt CU B.V.

The Company maintains dedicated support functions responsible for assisting business partners, facilitating technical integrations, managing operational issues, coordinating escalations, and supporting the delivery of gaming products and services.

Effective support operations are critical to maintaining service quality, client satisfaction, platform stability, and long-term commercial relationships.

8.2 SUPPORT FUNCTION OVERVIEW

The Support Function serves as a central operational point of contact between GameArt CU B.V and its clients.

Support activities are designed to ensure that client enquiries, technical issues, operational requests, and platform-related concerns are managed efficiently and consistently.

The support framework consists of:

CUSTOMER SUPPORT

Responsible for client communications, operational enquiries, account assistance, escalation management, and coordination with internal departments.

TECHNICAL SUPPORT

Responsible for technical troubleshooting, integration support, testing assistance, issue investigation, and coordination with Development and GameHub teams.

The support teams work collaboratively to ensure that issues are resolved efficiently and that clients receive timely updates throughout the resolution process.

8.3 CUSTOMER SUPPORT TEAM

The Customer Support Team serves as the primary point of contact for operators, aggregators, and business partners.

The team operates on a 24/7 basis and is responsible for managing incoming enquiries, coordinating internal escalations, and supporting day-to-day operational activities.

Key responsibilities include:

- Responding to client enquiries.
- Managing support tickets.
- Monitoring operational issues.
- Coordinating escalations.
- Supporting account management activities.
- Facilitating communications between clients and internal teams.
- Tracking issue resolution progress.

- Maintaining support records.

In addition to day-to-day support activities, the Customer Support and Technical Support functions contribute operational feedback throughout the Product Development Lifecycle. Historical incident trends, recurring customer issues, technical observations, and operational challenges are communicated to Product, Development, and Management teams during product reviews, planning activities, and lifecycle assessments.

This feedback supports continuous improvement initiatives and assists the Company in identifying opportunities to enhance product performance, operational stability, customer experience, and service quality.

8.4 SUPPORT CHANNELS

Clients may contact the Company through approved communication channels including:

- Zendesk.
- Email.
- Microsoft Teams.
- Slack.
- Jira Service Desk.
- Other approved communication platforms.

All communications and support activities are recorded and retained within the Company's operational systems.

Support tickets are assigned, prioritised, tracked, and monitored using the Company's ticket management systems.

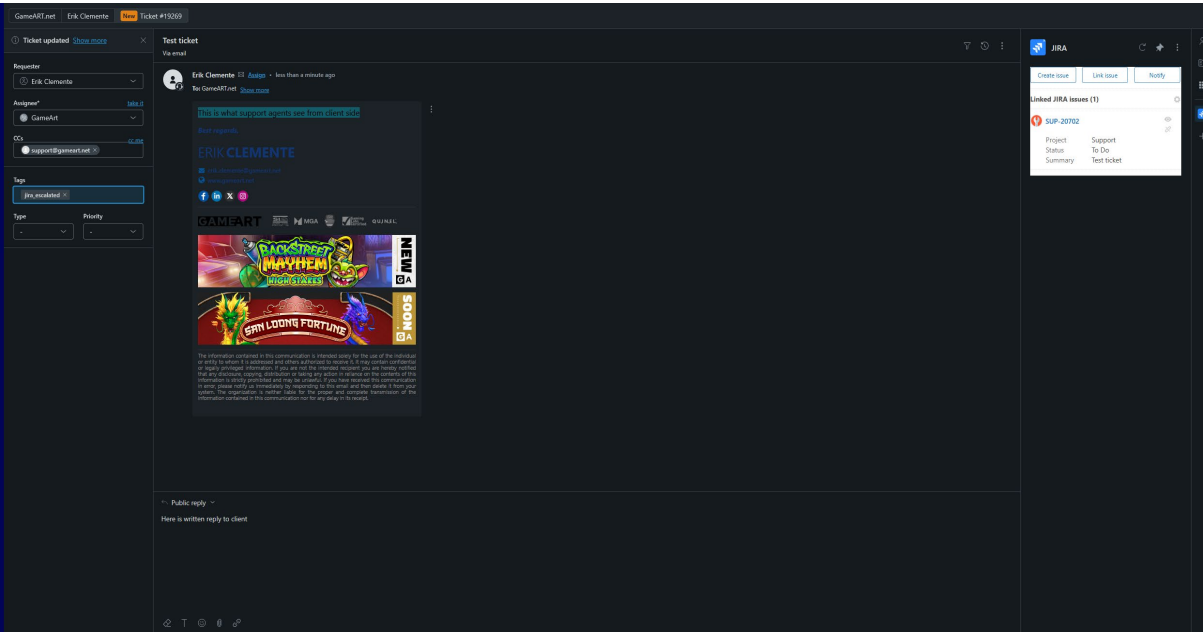


Figure 8.1 – Customer Support Ticket Management Environment

Example of a customer support ticket within the Company's ticket management platform. The system is used to record customer enquiries, maintain communication records, assign ownership, monitor progress, and facilitate escalation to Technical Support or other departments where further investigation or action is required.

8.5 TECHNICAL SUPPORT TEAM

The Technical Support Team provides specialised technical assistance to operators, content providers, and internal departments.

The team supports:

- Platform integrations.
- API connectivity.
- Environment configuration.
- Testing activities.
- Technical troubleshooting.
- Incident investigations.
- Deployment support.
- Platform monitoring.

Technical Support works closely with Development, GameHub, Product, and Infrastructure teams to ensure the efficient resolution of technical issues.

The team also supports client onboarding projects and assists clients throughout the integration lifecycle.

8.6 SUPPORT TICKET MANAGEMENT

All client enquiries and technical issues are managed through a structured ticket management process.

The process consists of:

Step 1 – Ticket Creation

Issues may be reported through any approved communication channel and are recorded within the Company's support systems.

Step 2 – Classification

Tickets are categorised according to:

- Issue type.
- Operational impact.
- Technical complexity.
- Business impact.
- Priority level.

Step 3 – Investigation

The assigned support team reviews the issue and gathers relevant information.

Step 4 – Resolution or Escalation

Where possible, issues are resolved directly by Support.

Where specialist intervention is required, the matter is escalated to the appropriate department.

Step 5 – Closure

Following confirmation of resolution, the ticket is formally closed and retained within the Company's records.

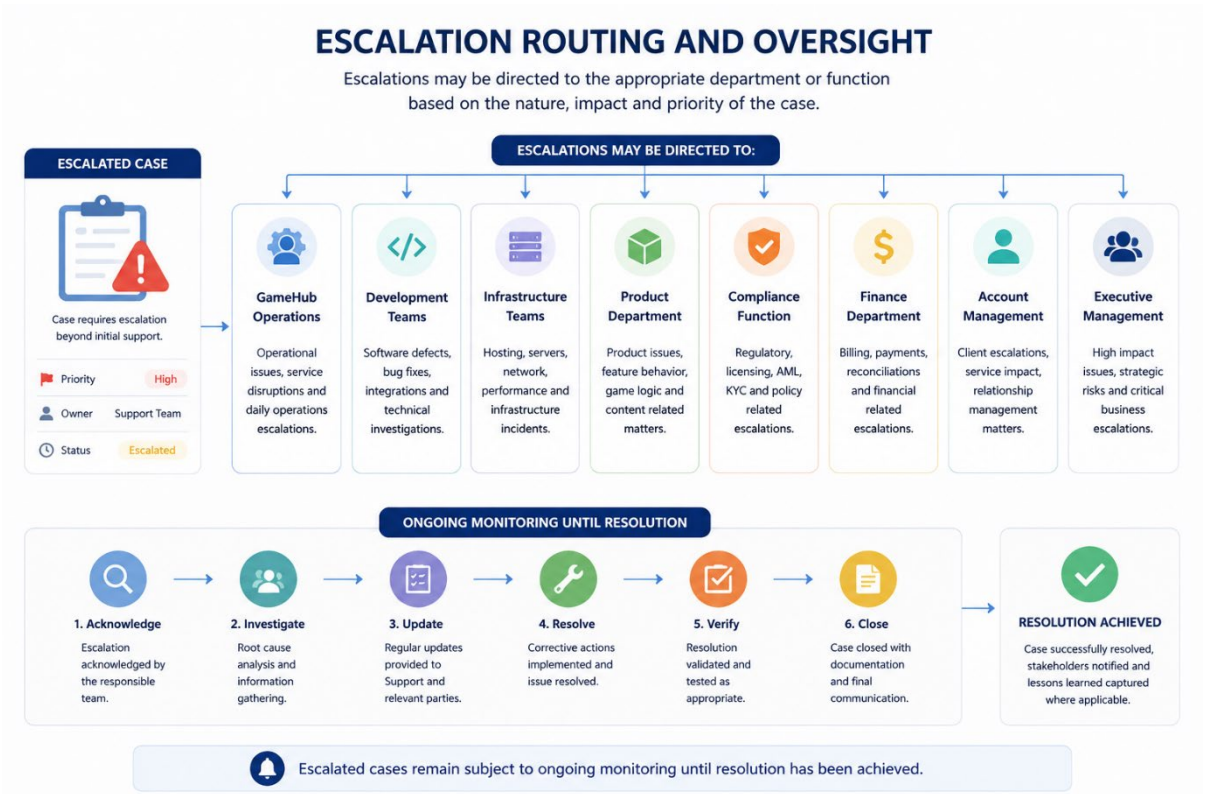
8.7 ESCALATION FRAMEWORK

Support personnel are responsible for identifying issues requiring escalation and ensuring that all relevant information is transferred to the appropriate department.

Escalations may be directed to:

- GameHub Operations.
- Development Teams.
- Infrastructure Teams.
- Product Department.
- Compliance Function.
- Finance Department.
- Account Management.
- Executive Management.

Escalated cases remain subject to ongoing monitoring until resolution has been achieved.



Customer Support remains responsible for maintaining communication with the client and coordinating updates throughout the investigation process.

8.8 INCIDENT COORDINATION

Where a support issue develops into a wider operational or technical incident, Support personnel assist with incident coordination activities.

Responsibilities include:

- Incident logging.
- Stakeholder notifications.
- Client communications.
- Escalation tracking.
- Status reporting.
- Resolution monitoring.

Support teams work closely with Incident Response personnel to ensure that information is communicated accurately and consistently.

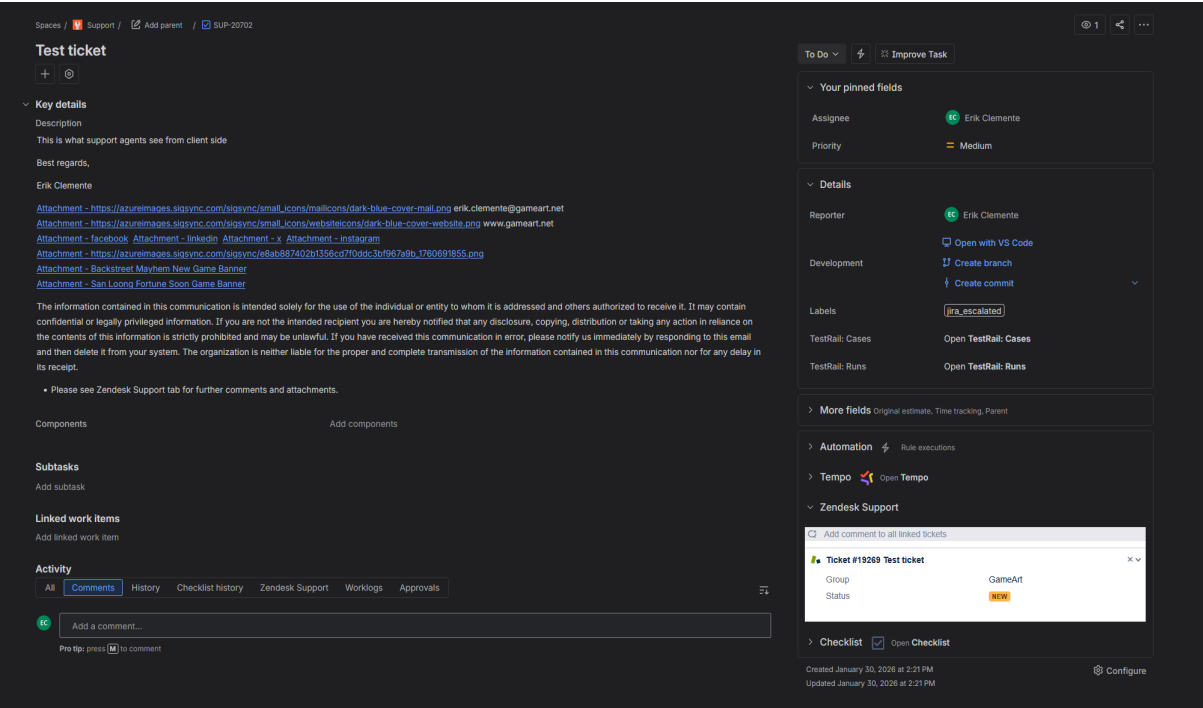


Figure 8.2 – Jira Escalation Workflow

Example of an escalated support case recorded within the Company's issue management system. The platform is used to assign ownership, coordinate investigations, track progress, document actions taken, and maintain a complete audit trail through to final resolution.

8.9 CLIENT COMMUNICATION STANDARDS

Support personnel are expected to maintain professional, accurate, and timely communications with all clients.

Communication standards include:

- Clear and transparent communication.
- Timely responses.
- Accurate status updates.
- Professional conduct.
- Consistent documentation.
- Escalation transparency.

Where incidents affect multiple clients, coordinated communication procedures are implemented to ensure consistency and accuracy.

8.10 KNOWLEDGE MANAGEMENT

The Support Function maintains operational knowledge repositories to support issue resolution and service consistency.

Documentation may include:

- Support procedures.
- Troubleshooting guides.
- Integration documentation.
- Technical manuals.
- Incident reports.
- Frequently asked questions.
- Internal knowledge articles.

Knowledge resources are reviewed and updated periodically to support operational effectiveness and staff development.

8.11 PERFORMANCE MONITORING AND KPIS

Support performance is monitored through operational reporting and key performance indicators.

Metrics may include:

Customer Support KPIs

- First response times.
- Ticket resolution times.
- Ticket backlog levels.
- Escalation volumes.
- Client satisfaction indicators.
- Service quality reviews.

Technical Support KPIs

- Integration support effectiveness.
- Resolution efficiency.
- Incident response times.
- Testing accuracy.
- Escalation effectiveness.
- Internal stakeholder feedback.



Management reviews support metrics periodically to identify trends, opportunities for improvement, and training requirements.

8.12 SUPPORT SYSTEMS AND TOOLS

Support personnel utilise a range of operational systems and tools to perform their duties.

These may include:

- Zendesk.
- Jira.
- Microsoft Teams.
- Slack.
- Confluence.
- Monitoring platforms.
- Reporting tools.
- Internal administration systems.

These systems support collaboration, ticket management, issue tracking, communication, reporting, and operational oversight.



8.13 RECORD KEEPING

Records relating to support activities are maintained in accordance with internal record retention requirements.

Records may include:

- Support tickets.
- Client communications.
- Escalation records.
- Incident reports.
- Resolution records.
- Technical investigations.
- Service reports.

These records support operational oversight, audits, incident reviews, and continuous improvement activities.

8.14 CONTINUOUS IMPROVEMENT

GameArt CU B.V. is committed to continuously improving its support operations and service delivery standards.

Feedback obtained from clients, operational reviews, incident analyses, support metrics, and internal assessments is used to enhance procedures, improve efficiency, and strengthen the overall client experience.

The Company regularly reviews support processes, systems, and performance indicators to ensure that services remain aligned with business objectives and client expectations.



Chapter 9

Finance and Financial Controls



CHAPTER 9 – FINANCE AND FINANCIAL CONTROLS

9.1 PURPOSE

The purpose of this chapter is to establish the framework governing financial management, accounting activities, financial controls, reporting obligations, and treasury functions within GameArt CU B.V.

The Finance Department plays a critical role in supporting the Company's operational activities, strategic objectives, regulatory obligations, and corporate governance framework. Through the implementation of effective financial controls and reporting procedures, the department ensures the integrity, accuracy, and reliability of the Company's financial information.

The Finance Department supports management decision-making, regulatory compliance, business planning, and operational oversight through the provision of timely and accurate financial reporting and analysis.

9.2 FINANCE DEPARTMENT OVERVIEW

The Finance Department is responsible for ensuring accurate financial reporting, regulatory compliance, and effective financial controls across all areas of the Company's operations.

The department supports day-to-day business activities while ensuring that financial records are maintained in accordance with applicable accounting standards, internal policies, and regulatory requirements.

The Finance Department operates as an independent control function and works closely with Executive Management, Compliance, Human Resources, Product, Account Management, and other operational departments.

Core objectives of the department include:

- Maintaining accurate accounting records.
- Supporting financial planning and budgeting activities.
- Ensuring regulatory and statutory compliance.
- Monitoring financial performance.
- Supporting audit activities.
- Managing financial risks.
- Maintaining effective internal controls.
- Supporting sustainable business growth.

9.3 DEPARTMENT STRUCTURE

The Finance Department operates under the supervision of the Chief Financial Officer (CFO).

The department currently consists of:

Chief Financial Officer (1)

The CFO is responsible for the overall financial management of the Company and provides strategic oversight of all financial activities.

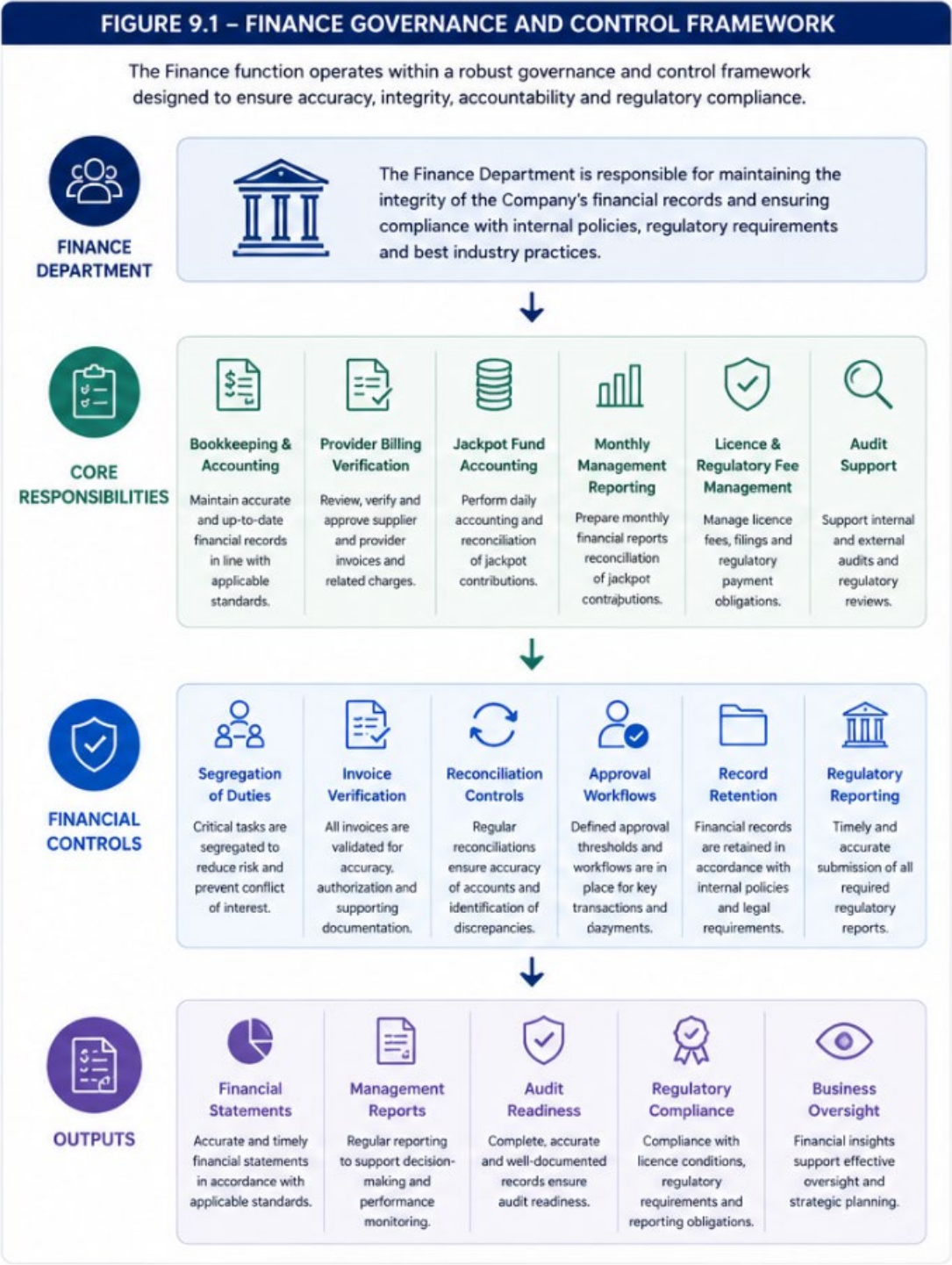
Key responsibilities include:

- Financial governance.
- Financial planning and analysis.
- Budget management.
- Treasury oversight.
- Financial reporting.
- Regulatory reporting.
- Financial risk management.
- Audit coordination.

Accountant / Bookkeeper (2)

The accounting team is responsible for the day-to-day execution of financial activities, including bookkeeping, reconciliations, invoice processing, record keeping, and financial reporting support.

The segregation of responsibilities within the department supports effective oversight and reduces operational risk.



9.4 FINANCIAL GOVERNANCE

GameArt CU B.V maintains a financial governance framework designed to ensure accountability, transparency, and effective financial oversight.

The framework includes:

- Segregation of duties.
- Management review procedures.
- Financial reporting controls.
- Approval hierarchies.
- Reconciliation procedures.
- Audit processes.

- Budget monitoring.

Financial decisions are subject to defined approval authorities and management oversight to ensure that transactions are appropriately authorised and recorded.

9.5 BOOKKEEPING AND ACCOUNTING

The Finance Department is responsible for maintaining complete and accurate accounting records for all business activities.

Accounting activities include:

- General ledger maintenance.
- Journal entries.
- Invoice processing.
- Accounts payable management.
- Accounts receivable management.
- Financial reconciliations.
- Expense recording.
- Revenue recording.

Financial records are maintained in accordance with applicable accounting standards and internal financial procedures.

All accounting entries are supported by appropriate documentation and retained in accordance with record retention requirements.

9.6 GAME PROVIDER BILLING AND REVENUE SHARE MANAGEMENT

As part of its operations, GameArt CU B.V manages financial relationships with gaming operators, content providers, and business partners.

The Finance Department is responsible for:

- Verification of provider invoices.
- Revenue share calculations.
- Settlement calculations.
- Contractual billing reviews.
- Financial reconciliations.
- Dispute resolution support.

Revenue share arrangements are reviewed against contractual agreements to ensure that settlements are calculated accurately and consistently.

Any discrepancies identified during reconciliation activities are investigated and resolved prior to payment processing.

9.7 JACKPOT FUND ACCOUNTING

Where applicable, the Finance Department is responsible for the accounting, tracking, and reporting of jackpot-related financial activities.

Responsibilities include:

- Tracking jackpot contributions.
- Monitoring jackpot balances.

- Recording jackpot payouts.
- Maintaining reconciliation records.
- Supporting regulatory reporting requirements.

Jackpot accounting records are maintained separately and monitored to ensure transparency and accuracy.

9.8 FINANCIAL RECONCILIATIONS

Regular reconciliations are performed to ensure the accuracy and completeness of financial records.

Reconciliation activities may include:

- Bank reconciliations.
- Provider reconciliations.
- Revenue reconciliations.
- Invoice reconciliations.
- General ledger reconciliations.
- Balance sheet reconciliations.

Reconciliation exceptions are investigated promptly and corrective actions are implemented where necessary.

The completion of reconciliations is monitored by management as part of the Company's financial control framework.

9.9 FINANCIAL REPORTING

The Finance Department prepares periodic financial reports to support management oversight and business decision-making.

Reporting activities include:

- Monthly management accounts.
- Financial performance reports.
- Budget variance analysis.
- Revenue reporting.
- Cost analysis.
- Cash flow reporting.
- Forecasting reports.

Financial reports are reviewed by management and used to monitor performance against strategic and operational objectives.



9.10 BUDGETING AND FINANCIAL PLANNING

The Company maintains budgeting and forecasting processes to support financial management and strategic planning.

Budgeting activities include:

- Annual budget preparation.
- Departmental budget reviews.
- Resource planning.
- Revenue forecasting.

- Expense forecasting.
- Capital expenditure planning.

Actual financial performance is compared against approved budgets and significant variances are reviewed by management.

9.11 REGULATORY FEES AND STATUTORY OBLIGATIONS

The Finance Department is responsible for monitoring and managing regulatory and statutory financial obligations.

Responsibilities include:

- Licence fee payments.
- Regulatory fees.
- Corporate filings.
- Tax obligations.
- Government reporting requirements.
- Statutory payment deadlines.

The department maintains procedures to ensure that all regulatory and statutory obligations are fulfilled accurately and within required timeframes.

9.12 AUDIT MANAGEMENT

The Finance Department coordinates all external audit activities and acts as the primary point of contact for auditors.

Audit responsibilities include:

- Preparation of audit documentation.
- Coordination with auditors.
- Provision of supporting records.
- Resolution of audit queries.
- Implementation of audit recommendations.

Management reviews audit findings and monitors the implementation of corrective actions where required.

9.13 INTERNAL CONTROLS

GameArt CU B.V maintains a system of internal financial controls designed to protect Company assets and support the accuracy of financial reporting.

Controls may include:

- Segregation of duties.
- Approval workflows.
- Access restrictions.
- Reconciliation controls.
- Management review procedures.
- Documentation requirements.
- Audit trails.

These controls are reviewed periodically to ensure their effectiveness and continued suitability.

9.14 FINANCIAL RISK MANAGEMENT

Financial risks are monitored as part of the Company's broader Risk Management Framework.

Examples of financial risks include:

- Liquidity risk.
- Credit risk.
- Operational risk.
- Fraud risk.
- Foreign exchange risk.
- Counterparty risk.

Management regularly reviews financial exposures and implements appropriate mitigation measures where necessary.

9.15 PERFORMANCE MONITORING AND KPIS

The performance of the Finance Department is monitored through defined service standards and operational objectives.

Key performance indicators may include:

- Timeliness of monthly reporting.
- Reconciliation completion rates.
- Audit readiness.
- Invoice processing timelines.
- Accuracy of financial reporting.
- Budget variance management.
- Regulatory payment compliance.

Performance metrics are reviewed periodically by management to ensure the effectiveness of the department and identify opportunities for improvement.

9.16 RECORD KEEPING

The Finance Department maintains records relating to:

- Accounting transactions.
- Financial reports.
- Invoices.
- Reconciliations.
- Audit documentation.
- Regulatory filings.
- Budgeting records.
- Financial approvals.

Records are retained in accordance with applicable legal, regulatory, and operational requirements.

9.17 CONTINUOUS IMPROVEMENT

GameArt CU B.V. is committed to maintaining a robust and effective financial management framework.

Financial processes, controls, reporting procedures, and governance arrangements are reviewed periodically to ensure they remain aligned with business objectives, regulatory requirements, and industry best practices.

Lessons learned from audits, reconciliations, financial reviews, and operational assessments are incorporated into ongoing improvements to strengthen the Company's financial control environment.



Chapter 10

Compliance, Risk Management and Regulatory Oversight



CHAPTER 10 – COMPLIANCE, RISK MANAGEMENT AND REGULATORY OVERSIGHT

10.1 PURPOSE

The Compliance Function is responsible for supporting GameArt CU B.V.'s adherence to applicable legal, regulatory, contractual, and licensing obligations. The function operates independently from operational departments and provides oversight, guidance, monitoring, and advisory support across all areas of the business.

The Compliance Function works closely with management, Product, Development, Commercial, Support, and Finance teams to ensure that regulatory requirements are considered throughout the Company's operations and product lifecycle.

The objective of the Compliance Function is to promote a culture of compliance, mitigate regulatory risks, support responsible corporate governance, and maintain the Company's suitability as a licensed B2B gaming supplier.

10.2 COMPLIANCE GOVERNANCE FRAMEWORK

The Company maintains a risk-based compliance framework designed to identify, assess, monitor, and manage regulatory obligations and associated risks.

The framework includes:

- Regulatory monitoring and horizon scanning.
- Internal policy and procedure management.
- Compliance reviews and assessments.
- Regulatory reporting obligations.
- Certification and licensing support.
- Incident and breach escalation procedures.
- Staff awareness and compliance training.
- Internal control monitoring.
- Audit support and remediation tracking.

Compliance activities are performed on an ongoing basis and are proportionate to the nature, scale, and complexity of the Company's operations.

10.3 ROLES AND RESPONSIBILITIES

The Compliance Function is responsible for:

- Monitoring compliance with applicable laws, regulations, and licence conditions.
- Providing regulatory guidance to management and operational teams.
- Supporting the implementation of compliance controls.
- Reviewing operational processes from a regulatory perspective.
- Coordinating certification and testing activities.
- Supporting regulatory inspections, audits, and information requests.
- Monitoring compliance-related incidents and corrective actions.
- Maintaining compliance-related policies and procedures.
- Supporting risk assessments across the business.

Department heads remain responsible for ensuring compliance within their respective areas of responsibility.

10.4 REGULATORY MONITORING

The Compliance Function monitors developments in applicable laws, regulations, technical standards, certification requirements, and industry guidance that may impact the Company's operations.

Where regulatory changes are identified, the Compliance Function assesses potential impacts and coordinates with relevant stakeholders to ensure appropriate implementation of required changes.

Material regulatory developments are communicated to management and relevant operational departments as necessary.

10.5 RISK MANAGEMENT

The Company applies a risk-based approach to compliance and operational management.

Risks may be identified through:

- Compliance reviews.
- Internal audits.
- Operational incidents.
- Product development activities.
- Regulatory developments.
- Certification findings.
- Customer feedback.
- Internal reporting mechanisms.

Identified risks are assessed according to their potential impact and likelihood and may be subject to mitigation plans, monitoring activities, or escalation to management where appropriate.

Risk management activities are reviewed periodically to ensure continued effectiveness.

See illustration below:

Figure 10.2 – Business Risk Assessment Framework: Overview of the Company's risk-based due diligence and risk assessment process used to evaluate business partners, suppliers, and commercial relationships. The framework incorporates risk categorisation, red flag identification, due diligence reviews, risk scoring, and ongoing monitoring requirements to support effective compliance and risk management.

The Company maintains internal controls designed to support regulatory compliance, operational integrity, information security, and business continuity.

- Segregation of duties.
- Approval workflows.
- Change management controls.
- Access management procedures.
- Documentation requirements.
- Audit trails.
- Incident reporting processes.
- Quality assurance controls.
- Certification procedures.

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10.7 TRAINING AND AWARENESS

Compliance awareness forms part of the Company's governance framework.

Employees receive appropriate guidance and training relevant to their role and responsibilities. Training may cover:

- Regulatory obligations.
- Information security requirements.
- Data protection principles.
- Responsible business conduct.
- Incident reporting obligations.
- Internal policies and procedures.

Additional training may be provided when significant regulatory or operational changes occur.

10.8 INCIDENT AND BREACH ESCALATION

Potential compliance breaches, control failures, regulatory concerns, or material incidents must be reported through the Company's escalation framework.

Incidents are assessed based on severity, impact, regulatory relevance, and potential business consequences.

Where appropriate, corrective actions are implemented and tracked until resolution. Significant incidents may be escalated to senior management and, where required, reported to relevant authorities, certification bodies, clients, or other stakeholders.

Compliance participates in post-incident reviews to identify root causes and support continuous improvement activities.

10.9 AUDIT AND REGULATORY REVIEWS

The Company supports internal and external audits, certification reviews, client due diligence assessments, and regulatory inspections.

The Compliance Function coordinates requests for information and assists departments in preparing documentation required for audits and reviews.

Findings arising from audits or reviews are documented and monitored until appropriate corrective actions have been completed.

Management receives updates regarding material findings and remediation activities where necessary.

10.10 CERTIFICATION AND TECHNICAL COMPLIANCE

As a B2B gaming supplier, the Company ensures that products and services are developed and maintained in accordance with applicable technical standards, certification requirements, and jurisdictional obligations.

Certification activities may include:

- Game certification.
- RNG verification.

- Technical compliance testing.
- Jurisdiction-specific approvals.
- Release validation activities.

Compliance works closely with Product, Development, QA, and external testing laboratories to coordinate certification requirements and ensure products meet applicable standards prior to release.

Products may not be released until all required certification and approval activities have been completed.

10.11 PRODUCT COMPLIANCE REVIEWS

The Compliance Function participates throughout the Product Development Lifecycle to ensure that products, features, and services are developed and released in accordance with applicable regulatory requirements and industry standards.

Compliance involvement may include:

- Review of regulatory requirements during planning activities.
- Assessment of jurisdictional restrictions.
- Certification readiness reviews.
- Product release reviews.
- Review of promotional and marketing considerations.
- Support during external certification processes.
- Monitoring of regulatory developments that may impact existing products.

Compliance reviews are performed at key stages of the Product Lifecycle and form part of the Company's broader governance framework.

Products may not proceed to release until all required compliance reviews and approvals have been completed.

Compliance also participates in lifecycle governance activities by providing guidance during planning, pre-production, production, certification, and launch phases to ensure regulatory considerations are incorporated into product design and operational processes from an early stage.

FIGURE 10.1 – PRODUCT LIFECYCLE COMPLIANCE REVIEW POINTS

Compliance is involved at key stages of the Product Development Lifecycle to ensure regulatory requirements and industry standards are incorporated from planning through to post-launch.



10.12 CONTINUOUS IMPROVEMENT

The Compliance Function contributes to the Company's continuous improvement framework through ongoing monitoring, reviews, risk assessments, audit activities, and stakeholder engagement.

Feedback from audits, operational incidents, certification activities, client interactions, and regulatory developments is used to identify opportunities for improvement and strengthen existing controls.

The Company is committed to maintaining effective compliance standards, strong governance practices, and a proactive approach to regulatory risk management.



Chapter 11

Human Resources and Training



CHAPTER 11 – HUMAN RESOURCES AND TRAINING

11.1 PURPOSE

The purpose of this chapter is to establish the framework governing recruitment, onboarding, employee development, performance management, training, and human resources administration within GameArt CU B.V.

The Company recognises that its employees are fundamental to the successful delivery of products, services, and operational objectives. Through effective recruitment, training, and development programmes, the Company seeks to maintain a skilled, professional, and engaged workforce capable of supporting business growth and regulatory compliance.

The Human Resources function supports the Company's operational and strategic objectives by ensuring that employees are recruited, developed, managed, and retained in accordance with applicable legal, regulatory, and organisational requirements.

11.2 HUMAN RESOURCES FRAMEWORK

The Human Resources Framework is designed to:

- Attract and retain qualified personnel.
- Support employee development.
- Promote professional conduct.
- Ensure compliance with employment obligations.
- Foster a positive workplace culture.
- Support organisational growth.
- Maintain workforce competency.
- Promote continuous learning and development.

The Human Resources function works closely with management and departmental leaders to ensure that staffing requirements and organisational objectives are aligned.

11.3 GOVERNANCE AND RESPONSIBILITIES

The Human Resources function operates under the supervision of the Chief People Officer (CPO).

The CPO is responsible for:

- Recruitment and onboarding.
- Human resources administration.
- Employee relations.
- Performance management.
- Training and development.
- Employee engagement initiatives.
- HR policy management.
- Workforce planning.

Department managers are responsible for supporting HR activities within their respective teams and ensuring that employees receive appropriate guidance, supervision, and development opportunities.

Employees are expected to comply with Company policies, procedures, and standards of professional conduct.

11.4 RECRUITMENT AND SELECTION

The Company maintains recruitment procedures designed to attract qualified candidates with the skills, experience, and competencies required for their respective roles.

Recruitment activities may include:

- Workforce planning.
- Job description preparation.
- Candidate sourcing.
- Interviews and assessments.
- Reference checks.
- Employment offer preparation.
- Contract execution.

The recruitment process seeks to ensure fairness, transparency, and consistency while supporting the Company's operational requirements and culture.

Where appropriate, background checks may be conducted prior to employment.

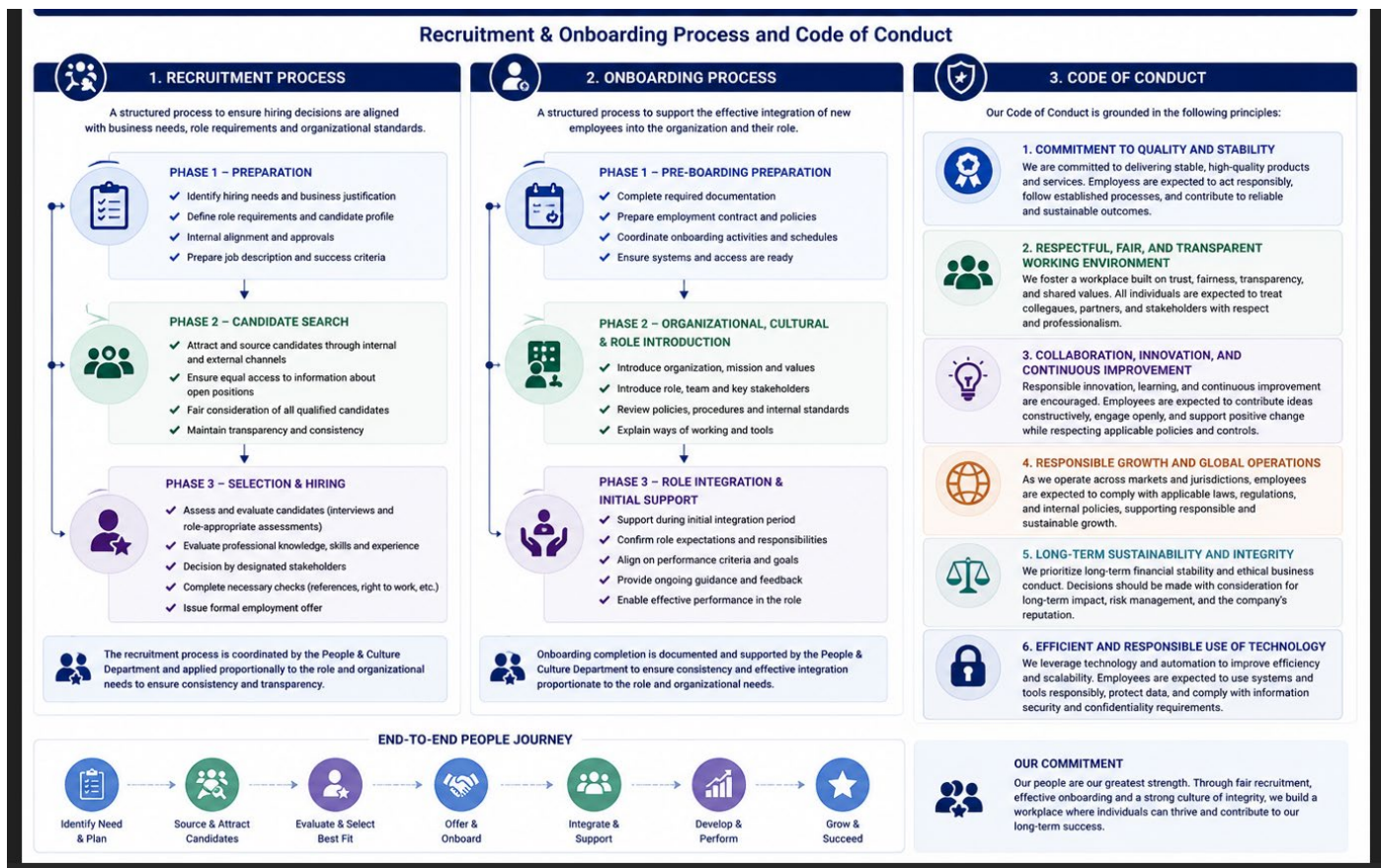
11.5 EMPLOYEE ONBOARDING

All new employees participate in a structured onboarding programme designed to support their integration into the organisation.

The onboarding process may include:

- Employment documentation.
- Introduction to the Company.
- Department orientation.
- System and access provisioning.
- Information security awareness.
- Policy familiarisation.
- Compliance training.
- Role-specific training.

The objective of onboarding is to ensure that employees understand their responsibilities, operational procedures, reporting lines, and organisational expectations from the outset of their employment.



11.6 TRAINING AND DEVELOPMENT

GameArt CU B.V is committed to maintaining a knowledgeable and competent workforce.

Training programmes are designed to support employee performance, professional growth, and regulatory compliance.

Training activities may include:

- Technical skills development.
- Product training.
- Compliance training.
- AML awareness training.
- Information security training.
- Data protection awareness.
- Leadership development.
- Professional certifications.
- Role-specific operational training.

Training requirements may vary according to role, department, and regulatory obligations.

Employees are encouraged to pursue continuous professional development and knowledge sharing within their respective teams.

11.7 PERFORMANCE MANAGEMENT

The Company maintains a performance management framework designed to support employee development, accountability, and organisational effectiveness.

Performance management activities may include:

- Objective setting.
- Performance reviews.
- Feedback sessions.
- Development planning.
- Skills assessments.
- Career progression discussions.

Managers are responsible for providing regular feedback and ensuring that employees receive appropriate support and development opportunities.

Performance reviews assist in identifying strengths, improvement opportunities, and future training requirements.

11.8 EMPLOYEE CONDUCT AND PROFESSIONAL STANDARDS

Employees are expected to conduct themselves professionally and ethically at all times.

All employees are required to:

- Act with integrity and professionalism.
- Maintain confidentiality.
- Protect Company assets and information.
- Comply with applicable policies and procedures.
- Avoid conflicts of interest.
- Respect colleagues, clients, and business partners.
- Report concerns through appropriate channels.

The Company promotes a culture of accountability, transparency, and mutual respect throughout the organisation.

11.9 CONFIDENTIALITY AND INFORMATION PROTECTION

Employees may have access to confidential business information, intellectual property, client information, and technical documentation.

Employees are required to:

- Protect confidential information.
- Use Company systems responsibly.
- Follow information security requirements.
- Prevent unauthorised disclosure of information.
- Report suspected security incidents.

Confidentiality obligations continue following termination of employment where required by contractual or legal obligations.

11.10 EMPLOYEE WELLBEING AND WORKPLACE CULTURE

GameArt CU B.V is committed to maintaining a positive, inclusive, and collaborative working environment.

The Company seeks to:

- Promote employee wellbeing.
- Encourage teamwork and collaboration.
- Support work-life balance.
- Foster professional growth.
- Recognise employee achievements.
- Maintain open communication channels.

Management encourages employees to contribute ideas, share knowledge, and participate actively in organisational development initiatives.

11.11 COMPETENCY MANAGEMENT

The Company seeks to ensure that employees possess the knowledge, skills, and competencies necessary to perform their responsibilities effectively.

Competency management activities may include:

- Skills assessments.
- Training evaluations.
- Knowledge sharing initiatives.
- Mentoring programmes.
- Succession planning.
- Professional development reviews.

Department managers are responsible for identifying competency requirements and supporting employee development within their teams.

11.12 HUMAN RESOURCES RECORDS

The Human Resources function maintains records relating to:

- Employment agreements.
- Recruitment documentation.
- Training records.
- Performance reviews.
- Employee certifications.
- Leave records.
- HR correspondence.

Records are maintained securely and accessed only by authorised personnel.

Retention of HR records is conducted in accordance with applicable legal, regulatory, and operational requirements.



11.13 CONTINUOUS IMPROVEMENT

GameArt CU B.V. is committed to continuously improving its human resources practices and employee development programmes.

Feedback from employees, management reviews, training assessments, organisational initiatives, and operational requirements is used to strengthen HR processes and support the Company's long-term growth objectives.

The Human Resources function periodically reviews policies, procedures, training programmes, and workforce planning activities to ensure continued effectiveness and alignment with business needs.



Chapter 12

Business Continuity and Incident Management



CHAPTER 12 – BUSINESS CONTINUITY AND INCIDENT MANAGEMENT

12.1 PURPOSE

The purpose of this chapter is to establish the framework governing business continuity, operational resilience, incident management, disaster recovery, and service restoration activities within GameArt CU B.V.

The Company relies upon technology systems, platform services, integrations, and operational processes to deliver products and services to its clients. The Business Continuity and Incident Management Framework is designed to minimise operational disruption, protect critical business functions, support client services, and ensure the timely recovery of systems and operations following disruptive events.

The framework supports the Company's commitment to maintaining reliable services, protecting stakeholder interests, and complying with applicable regulatory requirements.

12.2 BUSINESS CONTINUITY OBJECTIVES

The objectives of the Business Continuity Framework are to:

- Maintain critical business functions during disruptions.
- Protect employees, clients, and business assets.
- Minimise operational downtime.
- Support the recovery of technology systems and services.
- Preserve data integrity and availability.
- Ensure effective internal and external communications.
- Meet regulatory and contractual obligations.
- Strengthen organisational resilience.

The framework is designed to support both operational continuity and long-term recovery activities.

12.3 GOVERNANCE AND RESPONSIBILITIES

Business continuity and incident management activities are coordinated through a combination of Executive Management, Technology teams, GameHub Operations, Support teams, and other operational departments.

Executive Management

Executive Management is responsible for:

- Strategic oversight.
- Major incident decision-making.
- Resource allocation.
- External stakeholder communications.
- Recovery prioritisation.

Chief Technology Officer

The CTO is responsible for:

- Technology recovery activities.

- Infrastructure resilience.
- Incident escalation.
- Technical recovery planning.
- Disaster recovery coordination.

Department Managers

Department Managers are responsible for ensuring that continuity procedures exist for their respective functions and that employees understand their responsibilities during disruptive events.

12.4 INCIDENT MANAGEMENT FRAMEWORK

GameArt CU B.V maintains a structured incident management process designed to identify, assess, manage, and resolve incidents efficiently.

The incident management process consists of:

1. Incident identification.
2. Incident classification.
3. Escalation and notification.
4. Investigation and assessment.
5. Containment and mitigation.
6. Resolution and recovery.
7. Post-incident review.
8. Continuous improvement.

The objective of the process is to minimise disruption while restoring normal operations as quickly as possible.



12.5 INCIDENT IDENTIFICATION AND REPORTING

Employees are required to report actual or suspected incidents immediately upon discovery.

Examples of reportable incidents include:

- System outages.
- Infrastructure failures.
- API failures.
- Platform disruptions.
- Security incidents.
- Data breaches.
- Integration failures.
- Service degradation.
- Third-party service disruptions

Incidents may be identified through:

- Monitoring systems.
- Support tickets.
- Client reports.
- Internal reporting.
- Automated alerts.

All incidents shall be recorded and tracked through the Company's incident management systems.

12.6 INCIDENT CLASSIFICATION AND ESCALATION

Incidents are classified according to severity, operational impact, client impact, and urgency.

Critical Incidents

Incidents causing significant service disruption, platform unavailability, widespread client impact, or material business risk.

High-Priority Incidents

Incidents affecting important business services but not resulting in complete service failure.

Medium-Priority Incidents

Incidents causing limited operational disruption with manageable impact.

Low-Priority Incidents

Minor issues with limited impact on operations or service delivery.

Incident escalation procedures ensure that appropriate personnel are engaged according to the severity of the issue.

Escalations may involve:

- GameHub Operations.
- Development Teams.
- Infrastructure Teams.
- Support Teams.
- Compliance Function.
- Executive Management.



12.6 INCIDENT CLASSIFICATION AND ESCALATION

Incidents are classified according to severity, operational impact, client impact, and urgency.



CRITICAL INCIDENTS
Incidents causing significant service disruption, platform unavailability, widespread client impact, or material business risk.

- Complete service outage
- Platform unavailable
- Widespread client impact
- Data loss or major risk
- Immediate response required

SEVERITY LEVEL: 1 (CRITICAL)



HIGH-PRIORITY INCIDENTS
Incidents affecting important business services but not resulting in complete service failure.

- Major feature not working
- Partial service disruption
- High client impact
- Workaround may not be available
- Urgent response required

SEVERITY LEVEL: 2 (HIGH)



MEDIUM-PRIORITY INCIDENTS
Incidents causing limited operational disruption with manageable impact.

- Minor feature issues
- Performance degradation
- Limited client impact
- Workaround available
- Normal response time

SEVERITY LEVEL: 3 (MEDIUM)



LOW-PRIORITY INCIDENTS
Minor issues with limited impact on operations or service delivery.

- Cosmetic issues
- Minor bugs
- Low client impact
- No immediate action required
- Logged for tracking

SEVERITY LEVEL: 4 (LOW)

Incident escalation procedures ensure that appropriate personnel are engaged according to the severity of the issue.

ESCALATION MATRIX					
SEVERITY LEVEL	DESCRIPTION	RESPONSE TIME TARGET	PRIMARY RESPONSE TEAM	ESCALATES TO	NOTIFIED STAKEHOLDERS
1 CRITICAL	Significant service disruption, platform unavailability, or material business risk	15 minutes or less	Incident Response Team (IRT)	Head of Operations / Management	Management, Compliance, Key Clients (if applicable)
2 HIGH	Important services affected but not complete failure	30 minutes or less	Technical Support Lead	Operations Manager / Department Lead	Relevant Teams, Management (if needed)
3 MEDIUM	Limited operational disruption with manageable impact	4 hours or less	Technical Support Team	Team Lead	Relevant Teams
4 LOW	Minor issues with limited impact	1 business day or less	Support Agent	Team Lead (if needed)	Relevant Teams (if needed)

ESCALATION PROCESS

- 1. IDENTIFY & CLASSIFY**
Incident detected and classified according to severity level.
- 2. ASSIGN & RESPOND**
Assigned to the appropriate team based on the severity and impact.
- 3. ESCALATE (IF REQUIRED)**
Escalated to the next level if the issue is not resolved within the target response time.
- 4. RESOLVE & COMMUNICATE**
Issue resolved and communicated to relevant stakeholders.

**DOCUMENTATION & TRACKING**
All incidents are recorded in the incident management system (Jira). Status, actions taken, and resolution details are documented throughout the lifecycle.

**REVIEW & IMPROVEMENT**
All escalated and high-severity incidents are reviewed to identify root causes, lessons learned, and opportunities for improvement.

12.7 INCIDENT RESPONSE AND RECOVERY

Following incident classification, the responsible teams shall investigate the issue and implement appropriate containment and recovery measures.

Response activities may include:

- Root cause investigation.
- Service isolation.
- System recovery.
- Infrastructure restoration.
- Configuration rollback.
- Client communication.
- Third-party coordination.

Recovery activities are prioritised according to business criticality and operational impact.

The objective is to restore affected services safely and efficiently while minimising disruption to clients and business operations.

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12.8 MONITORING AND EARLY DETECTION

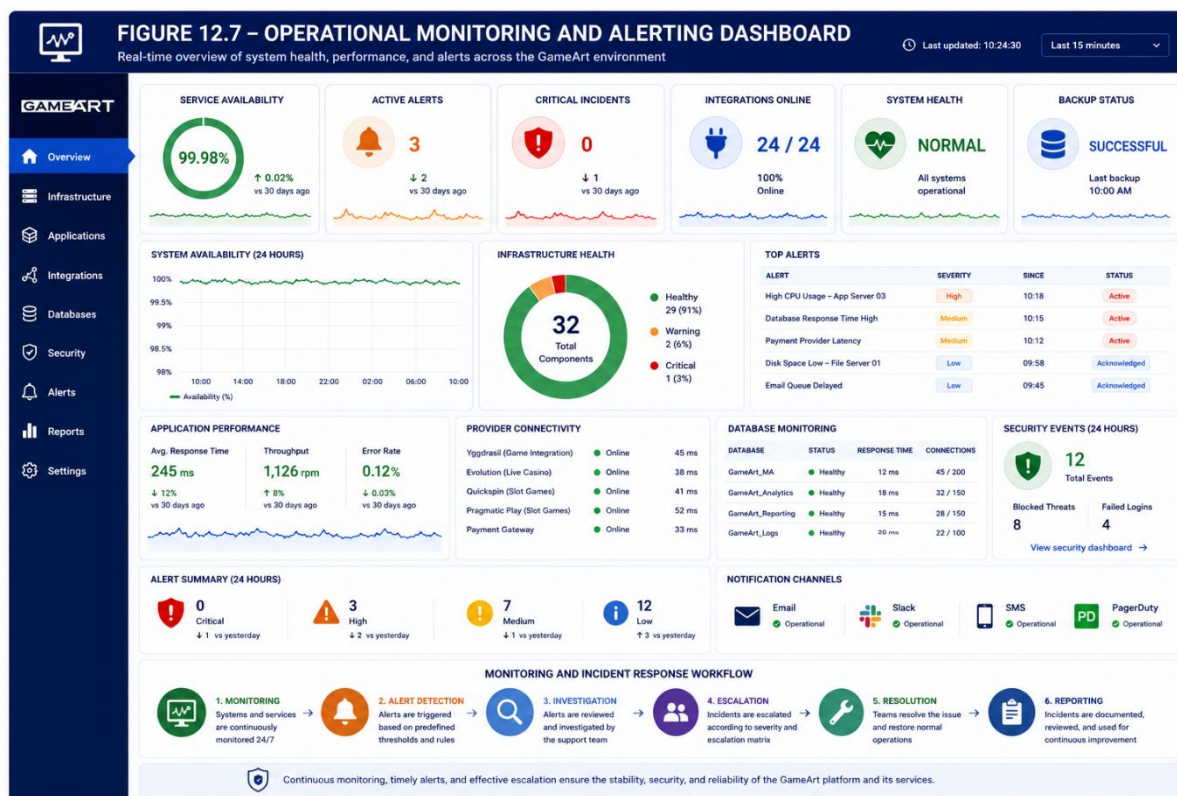
The Company maintains monitoring systems designed to detect operational issues before they develop into significant incidents.

Monitoring activities include:

- Infrastructure monitoring.
- Platform monitoring.
- API monitoring.
- Integration monitoring.
- Resource utilisation monitoring.
- Alert management.
- Security monitoring.

Monitoring tools provide real-time visibility into system performance and operational health.

Alerts are reviewed and investigated by the appropriate technical teams according to established procedures.



12.9 BUSINESS CONTINUITY PLANNING

GameArt CU B.V maintains documented business continuity arrangements designed to support critical operations during disruptive events.

Business continuity planning considers:

- Technology dependencies.
- Personnel availability.
- Third-party providers.

- Communication requirements.
- Infrastructure resilience.
- Data protection requirements.

The Company identifies critical business functions and prioritises recovery activities accordingly.

Business continuity planning is reviewed periodically to ensure continued effectiveness.

12.10 DISASTER RECOVERY

The Company maintains disaster recovery procedures to support the restoration of critical systems following major disruptions.

Disaster recovery measures may include:

- System backups.
- Infrastructure recovery procedures.
- Environment restoration processes.
- Data recovery procedures.
- Alternative operational arrangements.
- Recovery testing activities.

Recovery procedures are designed to support the restoration of critical services within acceptable operational timeframes.

12.11 COMMUNICATION MANAGEMENT

Effective communication is critical during incidents and disruptive events.

Communication activities may include:

- Internal employee notifications.
- Management updates.
- Client communications.
- Vendor notifications.
- Regulatory notifications where required.

Communication responsibilities are assigned according to the nature and severity of the incident.

The Company seeks to provide accurate, timely, and transparent information throughout the incident lifecycle.

12.12 THIRD-PARTY SERVICE DISRUPTIONS

The Company relies upon selected third-party providers to support its operations.

Where incidents involve external providers, the Company shall:

- Engage the provider immediately.
- Assess operational impact.
- Monitor remediation activities.
- Escalate where necessary.
- Communicate with affected stakeholders.

Third-party incidents are managed in conjunction with the Company's broader incident management framework.

12.13 POST-INCIDENT REVIEWS

Significant incidents are subject to post-incident review activities.

Reviews may include:

- Root cause analysis.
- Response effectiveness assessment.
- Recovery effectiveness assessment.
- Communication review.
- Identification of control weaknesses.
- Recommendations for improvement.

Findings are documented and monitored through to completion.

The objective of post-incident reviews is to strengthen operational resilience and reduce the likelihood of recurrence.

12.14 TESTING AND CONTINUOUS IMPROVEMENT

Business continuity and disaster recovery arrangements are reviewed and tested periodically.

Testing activities may include:

- Recovery exercises.
- Scenario testing.
- Tabletop exercises.
- Incident simulations.
- Backup restoration testing.

Results are reviewed by management and used to improve procedures, controls, and recovery capabilities.

Lessons learned from incidents, testing activities, audits, and operational reviews are incorporated into ongoing improvements across the Business Continuity Framework.

12.15 RECORD KEEPING

The Company maintains records relating to:

- Incident reports.
- Incident investigations.
- Recovery activities.

- Root cause analyses.
- Testing activities.
- Disaster recovery exercises.
- Corrective action plans.
- Communication records.

Records are retained in accordance with applicable legal, regulatory, and operational requirements.



Chapter 13

Record Keeping and Regulatory Reporting



CHAPTER 13 – RECORD KEEPING AND REGULATORY REPORTING

13.1 PURPOSE

The purpose of this chapter is to establish the framework governing the creation, maintenance, retention, protection, and reporting of records within GameArt CU B.V.

The Company recognises that accurate and complete records are essential for effective governance, operational management, regulatory compliance, financial accountability, and audit readiness.

Appropriate record keeping supports transparency, accountability, decision-making, and the Company's ability to demonstrate compliance with applicable legal, regulatory, contractual, and operational obligations.

13.2 RECORD KEEPING PRINCIPLES

GameArt CU B.V maintains records in accordance with the following principles:

- Accuracy.
- Completeness.
- Integrity.
- Accessibility.
- Confidentiality.
- Traceability.
- Regulatory compliance.

Records shall be maintained in a manner that allows authorised personnel to retrieve information efficiently while ensuring that unauthorised access, alteration, or destruction is prevented.

The Company seeks to maintain records that are sufficiently detailed to support operational activities, management oversight, audits, investigations, and regulatory reviews.

13.3 GOVERNANCE AND RESPONSIBILITIES

Responsibility for record keeping is shared across all departments.

Department Managers

Department Managers are responsible for ensuring that records generated within their areas of responsibility are:

- Accurate.
- Complete.
- Properly maintained.
- Retained for the required period.
- Protected from unauthorised access.

Compliance Function

The Compliance Function provides oversight regarding regulatory record keeping obligations and supports periodic reviews of documentation practices.

Finance Department

The Finance Department maintains financial and accounting records in accordance with statutory and operational requirements.

Human Resources

The Human Resources function maintains employment and personnel-related records.

Technology Teams

Technology departments maintain operational, technical, security, and system-related records.

13.4 CATEGORIES OF RECORDS

The Company maintains records across a wide range of operational activities.

Examples include:

Corporate Records

- Corporate registrations.
- Shareholder records.
- Board resolutions.
- Governance documentation.
- Organisational charts.

Client Records

- Due diligence documentation.
- Contracts and agreements.
- Onboarding records.
- Risk assessments.
- Client communications.

Financial Records

- Accounting records.
- Invoices.
- Reconciliations.
- Financial reports.
- Audit documentation.

Compliance Records

- Compliance reviews.
- Risk assessments.
- Regulatory correspondence.
- Sanctions screening records.
- Training records.
- Player Complaints

- Self-Exclusion
- Player Data

Operational Records

- Support tickets.
- Incident reports.
- Project documentation.
- Change management records.
- Product development records.

Human Resources Records

- Employment agreements.
- Recruitment documentation.
- Performance reviews.
- Training records.
- Employee certifications.

13.5 ELECTRONIC RECORD MANAGEMENT

The majority of Company records are maintained electronically using approved business systems and repositories.

Electronic record management systems may include:

- Jira.
- Confluence.
- Zendesk.
- Financial systems.
- Human Resources systems.
- Shared document repositories.
- Internal reporting platforms.

Access to records is restricted according to business requirements and the principle of least privilege.

Electronic records are subject to appropriate backup, recovery, and security controls.

13.6 DATA INTEGRITY AND SECURITY

The Company maintains measures designed to protect records from unauthorised access, alteration, loss, or destruction.

Controls may include:

- Access restrictions.
- User authentication.
- Audit logs.
- Backup procedures.
- Encryption where appropriate.
- Version control.
- Secure storage arrangements.

Employees are responsible for handling Company records in accordance with applicable policies and procedures.

Any suspected compromise of records or information assets shall be reported immediately through the appropriate escalation channels.

13.7 RECORD RETENTION

Records are retained for periods determined by:

- Regulatory requirements.
- Legal obligations.
- Contractual requirements.
- Operational needs.
- Audit requirements.

Retention periods may vary according to the nature of the record and the applicable obligations governing its maintenance.

Upon expiry of the applicable retention period, records may be securely archived or destroyed in accordance with approved procedures.

Where litigation, investigations, audits, or regulatory reviews are ongoing, records may be retained beyond normal retention periods until the matter has been concluded.

13.8 REGULATORY REPORTING

GameArt CU B.V maintains procedures to ensure that regulatory reporting obligations are fulfilled accurately and within required deadlines.

Regulatory reporting may include:

- Licensing submissions.
- Regulatory notifications.
- Corporate disclosures.
- Financial reporting.
- Compliance reporting.
- Audit-related reporting.
- Requests from competent authorities.

The Company seeks to maintain open and transparent communication with regulatory authorities and to respond promptly to lawful information requests.

13.9 MANAGEMENT REPORTING

Management reporting supports operational oversight, governance, and strategic decision-making.

Periodic reports may include:

- Financial performance reports.
- Operational performance reports.
- Product development updates.
- Support and service metrics.
- Risk management reports.
- Compliance reports.
- Human resources reports.

- Technology and security reports.

Management reviews these reports to monitor performance, assess risks, allocate resources, and support business planning activities.

13.10 AUDIT AND REGULATORY INSPECTIONS

The Company maintains records in a manner that supports audits, inspections, and regulatory reviews.

When requested, authorised personnel may provide records to:

- External auditors.
- Regulatory authorities.
- Legal advisers.
- Approved internal review functions.

The Company cooperates with lawful requests for information and maintains procedures to support efficient retrieval of relevant records.

13.11 CONTINUOUS IMPROVEMENT

GameArt CU B.V. periodically reviews its record keeping and reporting practices to ensure ongoing effectiveness, accuracy, and compliance.

Recommendations arising from audits, compliance reviews, operational assessments, regulatory developments, and management reviews are incorporated into process improvements where appropriate.

The Company remains committed to maintaining high standards of documentation, transparency, and accountability across all areas of its operations.



Chapter 14

Operations Manual

Governance and Review



CHAPTER 14. OPERATIONS MANUAL GOVERNANCE AND REVIEW

14.1 PURPOSE

This Operational Manual provides a comprehensive overview of the governance framework, operational structure, internal controls, and business processes of GameArt CU B.V.

The Manual has been developed to document how the Company conducts its activities as a licensed Business-to-Business gaming supplier and to demonstrate the systems and controls implemented to support regulatory compliance, operational resilience, information security, and sound corporate governance.

The Manual serves as a living document and shall be reviewed periodically to ensure that it remains accurate, relevant, and reflective of the Company's business activities, organisational structure, technology environment, and regulatory obligations.

14.2 REVIEW AND MAINTENANCE

Responsibility for maintaining this Manual rests with Executive Management in cooperation with the Compliance Function and relevant departmental stakeholders.

The Manual shall be reviewed:

- At least annually.
- Following material regulatory changes.
- Following significant organisational changes.
- Following major operational incidents.
- Following material changes to products, services, or technology infrastructure.

Updates shall be documented through the Company's document control procedures and communicated to relevant stakeholders where appropriate.

14.3 COMMITMENT TO CONTINUOUS IMPROVEMENT

GameArt CU B.V. is committed to maintaining effective governance, operational excellence, regulatory compliance, and continuous improvement across all areas of its business.

The Company regularly reviews its policies, procedures, controls, and operational practices to ensure alignment with industry standards, technological developments, business objectives, and regulatory expectations.

Feedback from employees, clients, audits, regulatory reviews, and operational assessments is incorporated into ongoing improvement initiatives designed to strengthen the Company's operational framework and support long-term sustainable growth.

14.4 DOCUMENT VERSION CONTROL

Version	Date	Author	Purpose
1.0	20/11/2025	GameArt - Compliance	Creation of this document
1.0	22/06/2026	GameArt- Compliance	Revision

CONCLUSION

This Operational Manual establishes the governance, operational, compliance, financial, human resource, and business continuity frameworks supporting the activities of GameArt CU B.V.

The Company operates through a structured system of policies, procedures, controls, and oversight mechanisms designed to support the delivery of gaming products and technology services while maintaining compliance with applicable legal, regulatory, and contractual obligations. These frameworks promote accountability, transparency, operational resilience, and effective risk management across all areas of the business.

The Company remains committed to continuous improvement and periodically reviews its operational arrangements to ensure they remain appropriate for the nature, scale, and complexity of its activities. Employees, management, and relevant stakeholders are expected to support and adhere to the principles and processes described within this Manual.

Together, these governance and operational arrangements contribute to the Company's objective of delivering reliable products, maintaining strong business relationships, protecting stakeholder interests, and supporting sustainable long-term growth.

END OF DOCUMENT

GameArt CU B.V. Operational Manual

Version 1.0

2025