

OPERATIONS MANUAL

Product: Online Casino and Sportsbook

Industry: Interactive Gaming

Regulating Authority: Curaçao Gaming Authority

Operator: Natural Nine B.V.

Adoption Date: July 2026

License Number: OGL/2024/1337/0628

POLICY OVERVIEW

This Operations Manual (the “Manual”) has been prepared in accordance with Article 5.9 of the National Ordinance Containing Rules concerning Games of Chance (“National Ordinance on Games of Chance” or “NOGC”).

The Manual provides information regarding the manner and degree of compliance with the provisions laid down in the NOGC and the rules and restrictions attached to Gaming License No. OGL/2024/1337/0628 held by Natural Nine B.V., a company duly incorporated and registered in Curaçao.

1. GAMBLING OPPORTUNITIES, PAYMENTS AND OUTCOME DETERMINATION

1.1 Games of Chance

The Operator offers the following gaming products through its authorised domains:

Slot Machines

Gameplay: Players spin reels with the aim of landing winning symbol combinations across paylines or ways to win.

Rules: Each slot game contains its own payable and rules.

Outcome Determination: Outcomes are determined through certified Random Number Generators (RNGs).

Blackjack

Gameplay: Players are dealt cards and aim to achieve a hand total closer to 21 than the dealer without exceeding it. Offered in both RNG and live dealer formats.

Rules: Standard blackjack rules apply.

Outcome Determination: Card distribution is generated through certified RNG systems.

Roulette

Gameplay: Players bet on the outcome of a wheel spin, including single numbers, groups of numbers and colours. Offered in both RNG and live dealer formats.

Rules: Standard roulette rules apply.

Outcome Determination: Results are determined using certified RNG technology.

Live Dealer Games

Gameplay: Real-time games conducted by live dealers. Live dealer titles include blackjack, roulette, baccarat and game show formats.

Outcome Determination: Results are determined through physical gameplay and transmitted digitally.

Other Games Offered

Shuffle Originals, being in-house provably fair games including Dice, Crash, Plinko, Mines, Limbo, Keno, Wheel and Hilo, together with baccarat, video poker, game shows and other table games supplied by licensed third party studios. A lottery product is also offered through the Website.

1.2 Sportsbook (if applicable)

The Operator offers sportsbook betting services on:

- Sports events
- E-sports events
- Live betting events

Bet types include:

- Single Bets
- Multi (Accumulator) Bets

Outcome determination is based on official event results obtained from recognised data providers. Pre-match and in-play Markets are offered, together with a Cash Out feature on selected Markets, as described in clause 11 of the Terms of Service.

1.3 Payment Methods

The Operator processes player deposits and withdrawals through recognised Payment Service Providers.

Deposit Methods

- Cryptocurrency deposits in supported digital assets, including BTC, ETH, LTC, USDT, USDC, XRP, TRX, DOGE and SOL
- In future, fiat purchases of cryptocurrency through integrated third party on-ramp providers, credited to the player as digital asset balances

Withdrawal Methods

- Cryptocurrency withdrawals to a wallet address nominated and controlled by the player

General Controls

- Deposits and withdrawals are subject to KYC and AML controls.
- Withdrawals are processed only to accounts belonging to the player.
- Enhanced Due Diligence may be applied where required.

- Suspicious transactions are reviewed by the Compliance Team. All wagers are placed in the specified digital asset, and any values expressed in fiat currency are indicative only.

1.4 Software and Outcome Determination

The Operator uses software supplied by:

Platform Provider: Proprietary Shuffle platform developed and maintained within the corporate group

Game Providers:

- Shuffle Originals (in-house provably fair titles)
- Pragmatic Play (slots and live casino)
- Evolution
- Sportradar (sportsbook odds, managed trading and data services)

All gaming outcomes are generated through certified systems and independently tested RNG mechanisms where applicable. Shuffle Originals use a provably fair system in which outcomes are generated from a combination of server seed, client seed and nonce, and are cryptographically verifiable by the player after each bet.

2. TEST METHODS OF QUALITY ASSURANCE

2.1 Objective

Quality assurance of the i-gaming business consists in ensuring that the cornerstone of the gaming software used by the Operator - random number generator (RNG) - is truly fair. To ensure fairness, unpredictability, and compliance, the RNG systems used in the platform are rigorously tested using statistical methods and third-party certification processes. For Shuffle Originals, fairness is additionally assured through provably fair cryptographic verification of each outcome rather than reliance on RNG certification alone.

2.2 RNG Standards

RNGs used on the Website must conform to international standards such as:

ISO/IEC 18031: Security techniques for random bit generation.

GLI-19/GLI-11: Guidelines from Gaming Laboratories International for interactive and RNG-based gaming systems.

2.3 Testing Procedures

Testing includes:

- Functional testing
- RNG testing
- Security testing
- Penetration testing
- Performance testing

2.4 Third Party Certification

Certifications are obtained from:

- Accredited independent testing laboratories engaged by the relevant game suppliers, including GLI accredited laboratories

Copies of certificates are maintained by the Compliance Department.

3. METHODS OF STORAGE OF PERSONAL DATA AND CRITICAL INFORMATION ABOUT PLAYERS

3.1 Data Centre and Physical Security

Hosting Provider: AWS (Amazon Web Services)

Server Location(s): AWS Region eu-central-1 (Frankfurt, Germany)

Physical security measures include:

- Restricted access
- CCTV monitoring
- Environmental controls

3.2 Availability and Regulatory Access

The Operator maintains systems allowing regulatory access where required. In accordance with Article 5.9 of the National Ordinance, digital records of critical information about players, their gaming transactions and their financial transactions will also be kept available to the CGA at all times on a server of a Tier IV certified data centre registered in Curaçao. The Operator is completing arrangements with a Curaçao registered Tier IV data centre provider in the future.

3.3 Encryption and Data Security

The following security controls are implemented:

- SSL/TLS encryption
- Encryption at rest
- Encryption in Transit
- Firewall protection
- Intrusion monitoring

3.4 Access Controls and Audit Trails

- Role-based access controls
- Multi-factor authentication
- Audit logging

3.5 Backup and Disaster Recovery

Backups are performed:

- Daily
- Weekly

- Monthly

Recovery procedures are tested periodically.

3.6 Data Protection

The Operator complies with applicable data protection laws and GDPR principles where relevant. Personal data is collected, used, stored and disclosed in accordance with the Operator's published Privacy Policy, which addresses the categories of personal information collected, processing purposes and legal bases, disclosure to service providers, security measures, retention, player rights of access, correction and deletion, and international transfers.

3.7 Data Retention

Player records are retained in accordance with applicable legal and regulatory requirements. Account and transaction data is generally retained following account closure in order to comply with anti money laundering and gaming regulatory requirements.

4. ELEMENTS OF VISUAL REPRESENTATION

The Operator displays the following information on its websites:

Entertainment Elements

- Game interfaces
- Promotional content
- Loyalty programmes

Transparency Elements

- Terms and Conditions
- Privacy Policy
- Responsible Gaming Information

Player Protection Elements

- Self-exclusion tools
- Deposit limits
- Responsible Gaming notices

5. MEASURES AGAINST UNAUTHORISED PARTICIPATION

5.1 Age Verification

Players must be at least 18 years of age, or the higher minimum legal age in the jurisdiction from which the player accesses the platform.

Verification is completed through KYC procedures.

5.2 Jurisdiction Controls

The Operator blocks access from restricted jurisdictions through geo-location controls. Access is permitted only from the jurisdictions set out in the Operator's List of Accepted Jurisdictions. All other jurisdictions are prohibited, and access from them is blocked through IP address detection. The use of VPNs, proxies or other anonymising methods to circumvent these controls is prohibited and results in compliance action. Under clause 7.3 of the Terms of Service, the Prohibited Jurisdictions include Australia, the Cayman Islands, Curaçao, Germany, the Netherlands, Portugal, Singapore, Spain, Sweden, the United Kingdom and the United States of America, together with any other location from which use of the Services is not permitted under applicable laws or which is embargoed by the United States, the European Union or the United Kingdom.

5.3 Identity Verification

Verification includes:

- Government-issued identification
- Proof of address
- Additional KYC documentation where required

Identity verification is conducted through an independent third party verification provider (SumSub), with politically exposed person and sanctions screening applied at onboarding and on an ongoing basis.

5.4 Device and Session Controls

Security measures include:

- Device monitoring
- Session management
- Login controls

5.5 Fraud Prevention

The Operator uses:

- Transaction monitoring
- Fraud detection tools
- Manual compliance reviews

These controls include blockchain analytics screening of cryptocurrency transactions through Chainalysis, automated monitoring of large transactions, multi account detection processes and manual review by the Compliance Team.

5.6 Self-Exclusion and Blacklists

Self-excluded players are prevented from accessing services. Device fingerprinting technology supports the Operator's account integrity and multi account detection controls, and identity documents used on more than one account are typically flagged and reviewed.

6. TECHNICAL INFRASTRUCTURE AND RECOVERY OPTIONS

Infrastructure Overview

Platform Provider: AWS (Amazon Web Services)

Hosting Provider: AWS (Amazon Web Services)

Data Centre Location: AWS Region eu-central-1 (Frankfurt, Germany)

System Components

- Front-end platform
- Back-office system
- Payment gateway integrations
- KYC systems
- CRM systems

Recovery Procedures

The Operator maintains:

- Business Continuity Plans
- Disaster Recovery Procedures
- Backup Infrastructure

7. RESPONSIBLE GAMING

7.1 Policy Measures

The Operator promotes responsible gaming and player protection.

7.2 Information and Warning Measures

Players are provided with:

- Responsible Gaming information
- Self-assessment tools
- Support resources

7.3 Responsible Gaming Tools

Available tools include:

- Wager Limits
- Loss Limits
- Self-Exclusion
- Account Closure

Self exclusion is available for fixed periods or permanently, and may be applied to Casino, Sports or both. Wager and loss limits may be set on a daily, weekly or monthly basis. These tools are accessible through the Shuffle Wise dashboard, and further detail is set out in the Operator's Responsible Gaming and Self-Exclusion Policy.

8. TERMS AND CONDITIONS

The Operator maintains publicly available Terms and Conditions governing:

- Account registration
- Deposits and withdrawals
- Bonus terms
- Responsible Gaming obligations
- Dispute resolution

The current Terms of Service (version 1.91, March 2026) are published on the Website, are governed by the laws of Curaçao, with the courts of Curaçao having non-exclusive jurisdiction, and address account registration, deposits and withdrawals, bonuses, responsible gaming obligations and dispute resolution.

9. DISPUTE RESOLUTION

Player complaints are managed through the following process:

1. Complaint submission
2. Internal review
3. Escalation where necessary
4. Regulatory escalation where applicable

Complaints are acknowledged within 2 days of receipt and, where escalated, a second level review by a senior manager is completed within a further 5 business days.

Complaints are handled in accordance with the Operator's Complaint Handling Policy. Complaints may be lodged free of charge by submitting a Complaint Submission Form through email or live chat at any time up to six months after the relevant incident or the settlement of the bet. All complaints are logged in the Operator's internal CRM system with a timestamp, user ID and the nature of the complaint. Where a complaint remains unresolved, the player may refer the dispute free of charge to EGIS, the independent alternative dispute resolution body appointed by the Operator, and the Operator cooperates fully with any third party adjudication. Records of unresolved or escalated complaints are retained for five years or such other period required by applicable law.

10. METHOD OF STORING DIGITAL RECORDS OF CRITICAL INFORMATION

10.1 Records Maintained

The Operator maintains records relating to:

- Player accounts
- Transactions
- KYC documents
- Communications
- Complaints
- Responsible Gaming interactions

10.2 Storage Infrastructure

Records are securely stored on:

- Secure production databases operated within the Operator's hosting environment
- Internal CRM and back office systems, including complaint and user interaction records
- Encrypted backup infrastructure subject to periodic recovery testing

Retention periods are applied in accordance with legal and regulatory requirements. Digital records of critical player, gaming transaction and financial transaction information will be kept available to the CGA at all times on a server of a Tier IV certified data centre registered in Curaçao once the arrangements referred to in Section 3 are completed. Communications regarding use of the Services are retained for a period of six years, consistent with the Terms of Service.