



Slice Media B.V.

T/A



Application for a licence issued by Curaçao Gaming Control Board

Presented –



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Executive Summary

Slice Media B.V. (“SMBV”); a company incorporated in Curaçao on 24 October 2017 under registration number 145203. SMBV is the holder of a Curaçao Gaming sub-licence under licence number 8048/JAZ issued to Antillephone.

SMBV retains a Registered Office address at: 10 Korporaalweg Willemstad, Curaçao.

SMBV seeks approval from the Curaçao Gaming Control Board (“GCB”) to continue to operate its Gaming sub-licence under licence number 8048/JAZ, to offer business to customer gambling products under the brand ‘Primedice.com’.

SMBV is applying for the online gambling licence under the following licence categories:

- Casino Games (RNG);

The Company intends to offer gaming and sportsbook products via the URL <https://primedice.com/>.

The following business plan sets out how SMBV will meet the following key obligations:

- Compliance with Anti-Money Laundering and Countering the Financing of Terrorism (“AML/CFT”) legislation and Know Your Customer (“KYC”) obligations;
- Ensuring that SMBV has adequate AML/CFT controls in place;
- Demonstration that SMBV has implemented an effective Responsible Gambling Policy and controls in order to protect the young and the vulnerable.

SMBV and its representatives remain on hand to meet with representatives from the Curacao Gaming Control Board and/or respond to any questions as and when they arise.

Introduction

Primedice.com is one of the earliest original crypto gambling platforms in the world. Developed in 2013, the platform was created to introduce cryptocurrency as a wagering option for online dice games.

It gained mass popularity in the crypto community due to its provably fair model and low house edge.

Primedice.com is an established and internationally recognised brand within the crypto-gambling space. The brand is owned by Slide Media B.V (“SMBV”); a company incorporated in Curacao in October 2017 under registration number

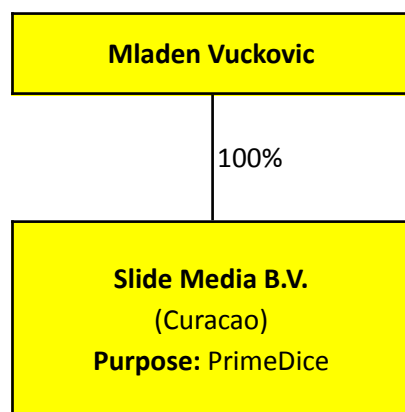


145203. SMBV is the holder of a Curacao Gaming sub-licence under licence number 8048/JAZ issued to Antillephone.

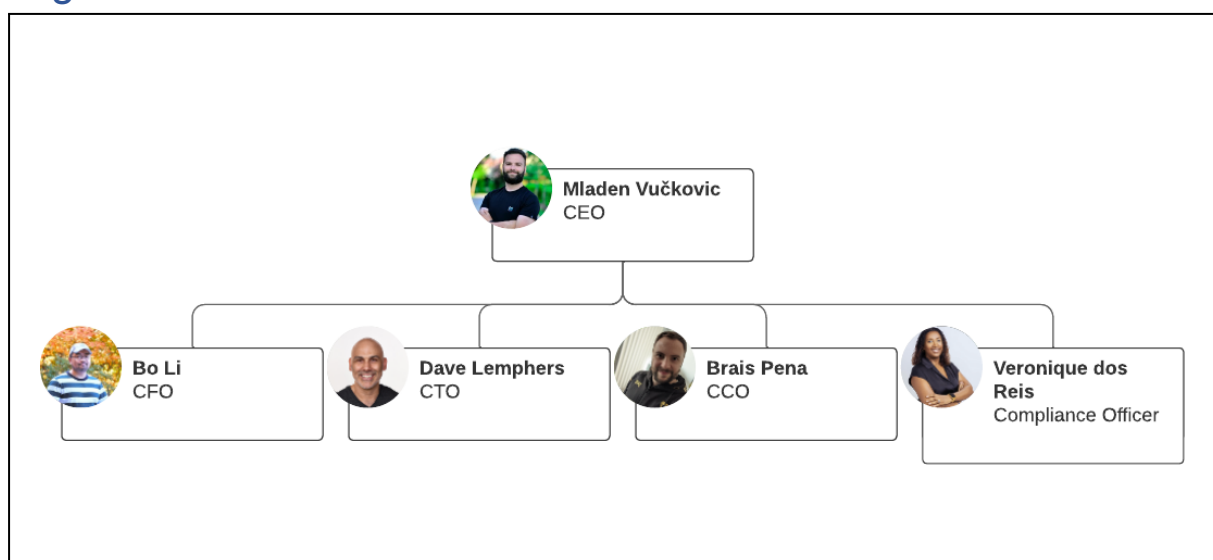
Company Structure

SMBV is legally owned by Mr Mladen Vuckovic (“UBOs”), who holds 100% of the shares.

Further information regarding Mr Vukovic can be found below within the Key Stakeholders’ Bios section.



Organisational Chart





CEO's Bio

Mladen Vuckovic



Mladen Vuckovic ("MV") is a 33-year-old businessman who focuses on entrepreneurship, technology and management.

Apart from Primedice.com, stake.com, Mladen is also the founder of Mebit, a smart digital solutions provider to gambling, blockchain and technology companies and Stake.com, one of the world's biggest crypto gambling platforms. Mladen Vučković attended Technical school Trstenik.

Products and Software

SMBV offers a single RNG product to its customers which is proprietary IP to our platform.

SMBV's software is proprietary and does not depend on any third-party casino provider to serve its gaming content. SMBV does however engage with the following third-party software providers for its operations, noted below:

- Optimove
- Intercom
- Sendgrid

optimove



All RNG casino content will be certified by an independently approved testing facility as having been tested to GCB standards or to those of a jurisdiction with which the GCB holds a memorandum of understanding with.



Business Growth and Future Plans

In connection with the above provided projections, we predict that the business growth will remain steady with no change in revenue for the next 3 years, and our overall strategy focusing on cost reduction initiatives that will bring us closer to profitability by the end of 2024.

Currently, our marketing efforts represent 81.7% of our revenue for the last financial year, we intend to decrease our marketing expenses to represent closer to 75% of the revenue, by implementing more targeted marketing initiatives that should optimise our cost allocation in this cost centre. This optimisation strategy should significantly reduce our total expenses to bring us to profitability in the next year.

We also predict that IT expenses will increase by 5% largely due to macroeconomic factors such as inflation and our financial and operational expenses to remain largely consistent with prior years.

Marketing

Marketing Channels

SMBV will continue to utilise the following marketing channels, which are already active under the existing operation:

- Twitter
- Facebook
- Instagram
- Reddit
- Bitcointalk Forum
- Direct traffic to the Primedice site; and
- Affiliates
- SEO

Affiliate Program

Primedice.com already has existing affiliate programs in place, with the following affiliate methods currently in place:

- Pay-Per-Click affiliates;
- Traditional affiliates networks; and
- New age affiliates.



Social Media

Focus has traditionally been on Twitter (<https://twitter.com/primedice>) where the brand has a strong following and remains an excellent channel by which to activate promotional campaigns.

As a brand, Primedice.com also uses Facebook, Instagram, Twitter and Reddit.

Funding

The Inspectorate will find enclosed within the application pack the 2023 financial statements for SMBV.

Since its inception in 2013, Primedice.com has consistently generated revenues that meet its operating costs until recent years due to increased competition in the crypto gambling industry.

Nonetheless, Slice Media NV relies on other means of funding including investment income that has consistently covered our operating costs.

Target KPIs and Business Objectives

Success is measured through the setting and monitoring of Key Performance Indicators (KPIs). These KPIs align with our long-term business objectives and are reported to management on a regular basis.

Regular KPI reporting enables product comparison, focusing our efforts on high impact areas that contribute to long-term goals. It also enables resource allocation in-line with business objectives.

KPIs include:

- Deposit volume and value
- Withdrawal volume and value
- Bet volume and value
- Number of active and new users
- User retention rate
- Turnover
- Gross gaming revenue (GGR), Net gaming revenue (NGR) and margin
- Bet volume and value



Financial Projections

As part of the application pack SMBV has prepared a set of financial projections for the Inspectorate's review. These projections are based on empirical data, using actual player numbers and figures under the existing operation via www.primedice.com.

The expenses within the projections sheet are proportionate with projected revenue, therefore if the number of players or average turnover reduces, expenses would be comparable.

Banking

SMBV uses One.io UK Limited (<https://www.one.io>) as its banking partner for its operational account.

Further details of the chosen banking arrangements will be provided to the GCB in due course. Should off-Island banking be required, SMBV will inform the Inspectorate and will request the necessary approval from the Commission.

Treasury Functions

Deposit and Withdrawal Methods

Customers on the SMBV site have the option to deposit and withdraw in different types of convertible virtual currency/cryptocurrency ("CVC"), with the following CVCs accepted on the platform:

Cryptocurrency:

- Apecoin - APE
- Bitcoin - BTC
- Ethereum - ETH
- Litecoin - LTC
- Dogecoin - DOGE
- Bitcoin Cash - BCH
- Binance Coin - BNB
- Binance - BUSD
- EOS - EOS
- Crypto.com - CRO
- Dai - DAI
- Chainlink - LINK
- Matic - MATIC
- Sand - SAND
- Shiba Inu - SHIB



- USD Coin - USDC
- USD Tether - USDT
- Ripple - XRP
- Tron - TRX

SMBV operates a 'same payment in, payment out' policy as per one of the requirements for virtual currency models outlined within the AML/CFT Guidance for Virtual Currencies 2020.

Player Protection Mechanism

Fiat

SMBV does not provide any option to deposit fiat currency on the Primedice.com platform.

Cryptocurrency

With regards to the protection of crypto, SMBV holds at least 100% of player crypto deposits. These funds are held in distinct wallets specific to each type of digital currency i.e. BTC, ETH, etc. The wallets hold cryptocurrency; not the fiat equivalent value of players' crypto-balances.

SMBV holds these funds in secure signature crypto currency wallets. The public wallet addresses will be disclosed to the GCB to enable the Inspectorate to see the balances of the wallets, using explorers such as www.etherscan.io and www.blockchain.com/explorer.

Risk Management

In the event of loss or interruption of our third party providers (i.e. Optimove, Intercom etc.) that are critical to the operations of the business, the following risk management procedures have been implemented to ensure any potential risks are mitigated:

Supplier Relationship Management

We have a direct line of communication with our providers via 24/7 communication channels such as Slack that enable our providers to notify us of any outages, updates or potentially issues as well as for us to report any issues that require immediate attention. As per our Service Level Agreements (SLAs), our providers are committed to remedy any issue, loss of service or interruption in most cases, under 24 hours.



In the interim period, communications plans are executed by our customer operations team to inform and notify our customers of any loss of service or issues as soon as they are arised and notified to them.

Contractual Agreements and Service Level Agreements (SLAs)

We implement robust contracts and SLAs with our third-party providers which include performance expectations, uptime guarantees, and remedies in case of service interruptions. These agreements provide legal recourse and financial compensation in the event that the provider fails to meet their obligations, helping to mitigate the impact of disruptions.

Business Continuity and Disaster Recovery Planning

We have comprehensive business continuity and disaster recovery plans to ensure that the business can maintain essential operations even in the face of provider interruptions. This may involve identifying alternative providers, establishing backup systems and data storage, and defining procedures for quickly restoring services in case of an outage.

Customer Services and Support

The Customer Service team for SMBV is provided by Mebit d.o.o, (“Mebit”); a company based in Serbia consisting of 300 team members and currently services the Primedice.com operation successfully.

The Mebit team offers 24/7 assistance to SMBV’s customers via email and live chat options, and provides support in English, Japanese and Spanish.

The current site is also available in the following generic languages:

- English;
- German;
- Spanish;
- French;
- Indian;
- Indonesian;
- Japanese;
- Korean;
- Polish;
- Portuguese;
- Russian;
- Turkish;



- Vietnamese;
- Chinese; and
- Finnish.

Hosting & Infrastructure

Primedice.com currently engages with AWS for its hosting services, which are based on servers located in Ireland.

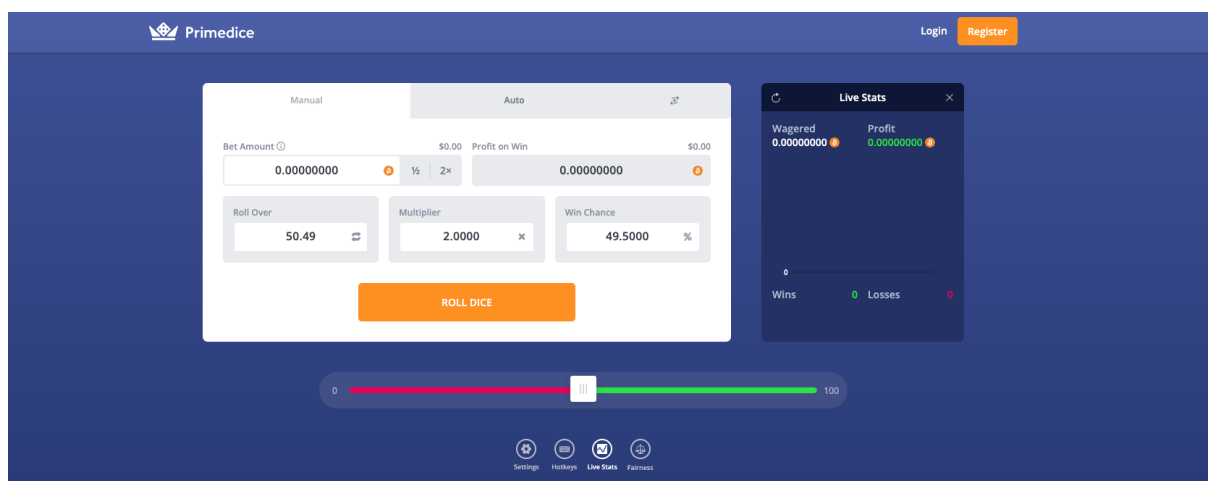
Data Protection

In respect of its data capabilities, the Company has built its own customer-facing and back-office platforms, which contain all the necessary reporting requirements compliant with the requirements under the laws of Curacao and GDPR.

SMBV's data will be backed up daily and will be retained for a minimum of 10 years. The data will continue to be retained for as long as is necessary under data protection regulations.

Website 'Look and Feel'

SMBV offers the Primedice.com platform under the URL www.primedice.com. The following screenshots are taken from the Primedice.com site and demonstrate that the website is presented in a very clean and simple fashion making it easy for customers to view information and navigate around the site.



SMBV currently has the Antillephone License logo at the foot of each landing page which will direct the player to the Antillephone License Validation web page.



1 BTC = \$70621.47000000

Primedice is owned and operated by Slicemedia B.V., registration number: 145203, registered address: Fransche Bloemweg, 4 Willemstad Curaçao. Contact us at support@primedice.com.



Primedice.com Website

SMBV undertakes regular checks on the website to identify any potential issues or areas of improvement at the earliest opportunity.

Checks are carried out to ensure that the websites display the following information:

- SMBV's full name and registered office address;
- The date that SMBV obtained its Curacao Licence;
- Statement to confirm the site is regulated in Curacao;
- Antillephone License Logo, hyperlinked to the Antillephone License Validation Website;
- Hyperlinks to problem gambling websites (located within the Responsible Gaming link on the landing page of each website);
- Statements providing a summary of registration arrangements, statement to the effect that players must be aged 18 or over and a statement highlighting that online gambling debts are enforceable in Curacao;
- Links to information on how players can self-exclude themselves from the website and cease receiving marketing material;
- Details on how players can limit their play;
- Contact details for SMBV and details of how players can communicate with the company; and
- Information on what return players can expect to receive from the games played.

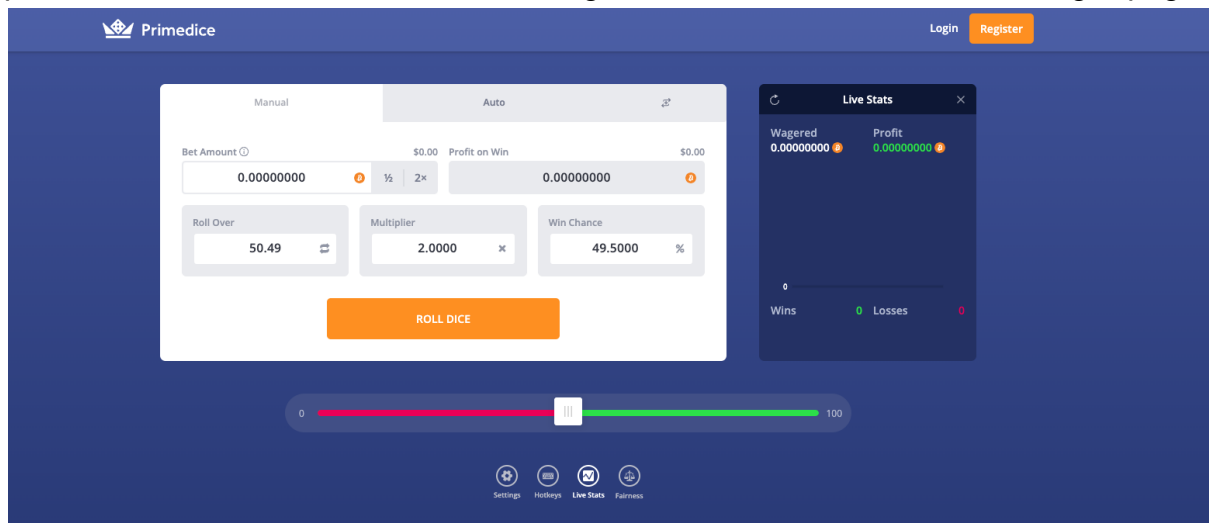
SMBV also ensures that the following information **is not** displayed on the Primedice.com website:

- Indecent or offensive information;
- Information of content which may be deemed to be deceptive or misleading;
- Comments which could be deemed as references to the legality of gambling elsewhere;
- Any content of a sexual or indecent nature;
- Any content which is aimed at or may attract players under the age of 18; or
- Content which is likely to breach copyright regulations.



Account Opening and On-Boarding

Each customer who wishes to sign-up to the SMBV site, will enter the Primedice.com platform and click the blue 'Register' button of the landing page:



Customers are then presented with the following screen, where they will enter their email, a chosen username, password, and confirm their date of birth.

The customer will also be required to confirm they have read and accepted the terms & conditions for use of the site before their account will be created.

Customers are unable to enter a date of birth confirming they are under the age of 18. If they attempt to do so, then they are presented with the warning message stating that they must be aged 18 or over.



The image shows a registration form for Primedice on the left and a promotional banner on the right. The banner features a large green and blue die and lists the following features:

- Provably Fair
- Lowest House Edge, 1%
- Instant Deposits & Withdrawals
- Longest Running Crypto Casino

Below the die, the banner states: "By accessing the site I attest that I am at least 18 years old and have read the Terms & Conditions."

The registration form on the left has the following fields and elements:

- Login Register** (tabs)
- Username *** (text input)
- Password *** (text input) with a tooltip: "name is a required field"
- Email** (text input) with a tooltip: "password is a required field"
- Date of Birth *** (Day, Month, Year dropdowns)
- Code (Optional) <** (text input)
- ☐ I am at least 18 years of age, and accept the Terms & Conditions.
- Play Now** (green button)
- Or continue with** (text)
- f** (Facebook icon)
- G** (Google icon)
- Discord** (Discord icon)

Customers will need to verify their email address via a link sent to their registered email address. Once their account has been created the customer will then be able to enter the site.

Each customer is assessed based on a risk model, categorising them as low, medium, or high risk. Our compliance team consistently reviews customer service functions to ensure alignment with AML legislation.

In alignment with our commitment to compliance, the Company proactively performs dummy registrations to pinpoint any system weaknesses. Any identified vulnerabilities are promptly reported to the Head of Compliance for necessary adjustments.



Terms and Conditions and Game Rules

SMBV provides customers Terms and Conditions (“T&Cs”) and Game Rules when customers register to the platform. Terms and conditions can be found here: <https://primedice.com/policies/terms>

Collusion, Cheating, Fraud and Criminal Activity

The following practises have been considered in relation to collusion, cheating, fraud, and criminal activity:

- Abuse of bonuses or promotions;
- The use of unfair external factors or influences (commonly known as cheating); and
- Opening of duplicate accounts.

If a customer suspects a person is engaged in any prohibited practices, then they will be encouraged to report it to SMBV.

By accepting the Terms and Conditions (“T&Cs”) customers agree that they will not participate or be connected with any form of prohibited practice when accessing the platform.

SMBV reserves the right to withhold all or part of the customers balance and/or recover from the player’s account any deposits, pay-outs, bonuses, or winnings which have been affected by or are in any way attributable to any of the event(s) set out in the T&Cs.

In exercising its rights outlined within the T&Cs, SMBV will use all reasonable endeavours to ensure that while complying with regulatory and legal obligations the company does so in a manner that is fair to all customers.

SMBV reserves the right to inform all relevant authorities including the GCB, if there are any suspicions or evidence of fraud, money laundering or terrorist financing activities (“ML/TF”). SMBV will co-operate fully with any investigations which subsequently take place.

Should any suspicious transactions or behaviour be identified then SMBV and its representatives will complete an internal disclosure or Suspicious Activity Report (“SAR”) and pass this to the MLRO for further investigation. If suspicions of ML/TF activities remain, the MLRO will submit an external disclosure to the FIU via a SAR.



Customer Complaints

In some circumstances SMBV may deem it appropriate to approach the GCB regarding a specific customer complaint. Should this be the case then SMBV will provide the Inspectorate with the following details:

- Customers full name and residential address;
- Player or username registered on the site;
- Customers registered email address;
- Details of the complaint including date and time of the game in question;
- Any additional information which we feel may be helpful to the Inspectorate.

Account Closures

Customers can opt to close their account by contacting support via the Primedice website. Further details regarding account closures will be available in the T&Cs which are accessible to all customers from the Primedice.com landing page.

Once a customer has requested to close their account, any gambling activities will be stopped immediately. An automated email will be sent to the player to confirm their account has been closed.

SMBV will return any positive balances due to the player. Once SMBV approves the withdrawal the relevant funds will be returned to the player via a deposit method previously used by the player.

Account closure instigated by SMBV

SMBV reserves the right to close a customer's account in line with the T&C's. The customer will be contacted via email, informed of SMBV's decision and the account immediately closed. Any available funds will be returned to the player unless SMBV considers that the customer's funds may be linked to criminal activity. In such circumstances the Company may consult the opinion of the GCB.

Account suspension instigated by SMBV

In certain situations, where SMBV deem that further investigation is required, SMBV may choose to suspend a customer's account as set out in the T&C's published on the Primedice.com site.

Upon suspension of the customer's account no activity will be permitted, and the account will be frozen.

SMBV will address the issue which has given rise to the account suspension with a view to resolving it as soon as practically possible so the account can either be reinstated or closed.



Account abandonment instigated by SMBV

SMBV reserves the right to close a customer's account if it is considered 'dormant'. The Company considers a 'dormant account' to be an account that has not been accessed for thirty consecutive months, that has a real money balance.

Should the customer not access their account for five years or more, SMBV shall make reasonable efforts to contact them, including sending the customer a final notice requesting that they withdraw any available funds, so that the customer may remit the balance on their account.

However, if the customer cannot be located or does not respond to the final notice with instructions for payment or proceed to withdraw their available funds, SMBV will be free to donate the funds to charitable organisations that assist with problem gambling.

Internal Control Systems

SMBV acknowledges that to function correctly and efficiently they will need a robust internal control framework, which is regularly tested to ensure that it remains fit for purpose.

Business Performance

It is imperative that SMBV retains firm control over the performance of the business and identifies any risks at the earliest opportunity.

SMBV can achieve this via several routes. Internally the Company will produce management accounts to ensure it always has an up-to-date position on the financial status of the business.

Financial Accounts

To adhere to legislation and licence requirements the company will instruct an independent auditor to carry out a full audit of the company's financial statements on an annual basis.

Compliance

SMBV will do annual reviews of internal audits of our policies and procedures. SMBV will do annual internal audits of our policies and procedures. The internal audit function provides independent, risk-based and objective assurance and advisory services designed to add value and improve the Company operations.

It helps the Company accomplish its objectives by bringing a systematic, disciplined approach to evaluate and improve the effectiveness of governance, risk management and internal control processes. There are no restrictions on the scope



of internal audit work. Internal audit activity is free from interference in determining the scope of internal audit work, performing the work and communicating the results.

The internal audit function reports functionally to the Audit Committee on the results of completed audits and day-to-day operations, additionally, all audit results and recommendations are directly reported to management for consideration and implementation.

Legal and Governance Framework

The Board of Directors serves as the cornerstone of corporate governance in the Company, tasked with overseeing strategic direction and ensuring alignment with stakeholders' interests. Currently, the board comprises professionals representing diverse expertise and backgrounds, fostering robust discussions and informed decision-making. While senior management handles day-to-day operations, the Board maintains an active role, offering guidance and setting overarching policies and objectives.

Key matters reserved for the Board include major strategic initiatives, financial decisions, and significant corporate transactions, safeguarding the company's long-term interests. Mechanisms are in place to prevent deadlock situations, ensuring continuity and effectiveness in governance processes.

The Directors, Designated Official and MLRO are aware of their responsibilities for keeping abreast of any changes in local gambling legislation. Changes in international gambling legislation, which may impact or affect the company, will also be considered. This will be done via industry publications, information in the public domain and attendance at specialist training seminars as and when available.

Legislative changes that directly impact on the company and the operation of its day-to-day business will be discussed at board level and will be captured in a minute.

All key stakeholders within the business are committed to operating an open and honest relationship with the GCB which is mutually beneficial to all parties going forward.

Going forward SMBV may wish to expand their outlook and seek out new markets to launch their product. The directors will carefully consider the markets which it wishes to operate in and will refresh its legal advice from time to time so as to remain vigilant.

Policies and Procedures

Our commitment to compliance is unparalleled, with every policy meticulously crafted and overseen by seasoned experts in the field. We ensure that each policy and procedure is developed under the close supervision of professionals boasting over 20 years of experience



in Compliance, adhering not only to local regulations in Curacao but also to globally recognised best legal and compliance practices.

Our dedicated internal compliance team works tirelessly to enhance and refine our policies, constantly striving to provide all necessary information to the GCB. The entire compliance team is dedicated to ensuring that our policies and procedures remain aligned with any regulatory updates, readily supplying them to the GCB upon request.

Recognising the imperative of identifying and assessing money laundering and terrorist financing risks, we rigorously establish and maintain proportionate policies, procedures, and controls, in accordance with regulatory requirements and licence obligations. Our approach is grounded in a risk-based methodology, effectively mitigating and managing the identified risks to uphold the highest standards of integrity and legality within our operations.

Further details are available in the SMBV AML manual.