

# MANAGEMENT STRUCTURE & INTERNAL CONTROLS

Riviera Entertainment N.V.

## 1. EXECUTIVE SUMMARY

This document outlines the comprehensive management structure, internal controls framework, and key personnel responsible for the operation of our online gaming platform under the Curacao gaming license. Our organizational structure ensures effective oversight, regulatory compliance, risk management, and responsible gaming practices.

## 2. CORPORATE GOVERNANCE STRUCTURE

### 2.1 Board of Directors

The Board of Directors provides strategic oversight and ensures compliance with all regulatory requirements.

| Position              | Responsibilities                                                                                                                                                                                         |
|-----------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| Chairman              | <ul style="list-style-type: none"><li>Overall strategic direction and governance oversight</li><li>Regulatory compliance at board level</li><li>Stakeholder relations and corporate governance</li></ul> |
| Executive Directors   | <ul style="list-style-type: none"><li>Daily operational management</li><li>Implementation of board decisions</li><li>Financial performance and business development</li></ul>                            |
| Independent Directors | <ul style="list-style-type: none"><li>Independent oversight and risk assessment</li><li>Audit committee supervision</li><li>Compliance monitoring and review</li></ul>                                   |

## 3. EXECUTIVE MANAGEMENT TEAM

### 3.1 Chairman

**Name:** Gabor Kispeter **Key**

**Responsibilities:**

- Overall business strategy and vision
- P&L responsibility and financial performance

- Regulatory relationship management
- Senior management team leadership
- Final authority on major business decisions
- Daily operations management
- Customer service and player support
- Product and gaming content management
- Operational risk management
- Process optimization and operational efficiency

### **3.2 Executive Director**

**Name:** Gabor Kispeter

**Key Responsibilities:**

- Financial planning, budgeting, and forecasting
- Treasury and cash management
- Financial reporting and audit coordination
- Anti-money laundering (AML) financial oversight
- Banking relationships and payment processing oversight
- Platform architecture and technology infrastructure
- Information security and data protection
- Gaming system integrity and RNG certification
- Disaster recovery and business continuity
- Technology vendor management

### **3.4 Chief Operating Officer (COO)**

**Name:** Vacant Role

**Key Responsibilities:**

- Daily operations management
- Customer service and player support
- Product and gaming content management
- Operational risk management
- Process optimization and operational efficiency

## **4. KEY COMPLIANCE PERSONNEL**

### **4.1 Money Laundering Reporting Officer (MLRO)**

**Name:** Everhona Makaya

**Qualifications:** [Professional certifications, relevant experience] **Primary**

**Responsibilities:**

- Regulatory reporting to Curacao Gaming Control Board

**Reporting Structure:**

Reports directly to the Board of Directors with complete independence

**4.2 Compliance Officer**

**Name:** Andres Caballero

**Qualifications:** [Professional certifications, relevant experience] **Primary**

**Responsibilities:**

- AML/CFT compliance program oversight
- Suspicious transaction monitoring and reporting
- Customer due diligence (CDD) and Know Your Customer (KYC) processes
- Regulatory reporting to Curacao Gaming Control Board
- Staff training on AML/CFT procedures
- Internal controls testing and compliance audits
- Interface with law enforcement and regulatory authorities

**4.3 Responsible Gaming Officer**

**Name:** Andres Caballero

**Primary Responsibilities:**

- Implementation of responsible gaming policies
- Problem gambling identification and intervention
- Self-exclusion program management
- Deposit limits and player protection tools
- Age verification processes
- Responsible gaming awareness and education

**4.5 Data Protection Officer (DPO)**

**Name:** Andres Caballero

**Primary Responsibilities:**

- GDPR and data protection compliance
- Data processing impact assessments
- Data breach response and notification
- Player data rights management
- Third-party data processor oversight

**5. INTERNAL CONTROLS FRAMEWORK****5.1 Financial Controls****Segregation of Duties:**

- Separation between transaction authorization, processing, and reconciliation
- Dual authorization for payments above threshold amounts

- Independent review of financial statements

#### **Player Funds Protection:**

- Segregated player accounts separate from operational funds
- Daily reconciliation of player balances
- Monthly external audit of player fund segregation
- Minimum reserve requirements maintained

#### **Payment Processing Controls:**

- Automated reconciliation of deposits and withdrawals
- Transaction limits and velocity checks
- Payment gateway monitoring and redundancy
- Chargeback management and dispute resolution

## **5.2 AML/CFT Controls**

#### **Customer Due Diligence:**

- Standard KYC for all customers: ID verification, address verification, age verification
- Enhanced due diligence (EDD) for high-risk customers and PEPs
- Ongoing monitoring and periodic review of customer information
- Source of funds verification for large transactions

#### **Transaction Monitoring:**

- Automated screening against sanctions lists (OFAC, UN, EU)
- Real-time transaction monitoring for suspicious patterns
- Threshold-based alerts for unusual activity
- Manual review of flagged transactions within 24 hours
- Suspicious Activity Report (SAR) filing procedures

#### **Record Keeping:**

- Minimum 5-year retention of all customer records and transactions
- Secure storage with appropriate access controls
- Audit trail for all data access and modifications

## **5.3 Technical and Security Controls**

#### **Information Security:**

- ISO 27001 compliant information security management system
- 256-bit SSL/TLS encryption for all data transmission
- Firewall and intrusion detection systems
- Regular penetration testing and vulnerability assessments
- 24/7 security operations center (SOC) monitoring

#### **Gaming Integrity:**

- Certified Random Number Generators (RNG) by accredited testing labs

- Game return-to-player (RTP) verification and monitoring
- Game outcomes stored securely for dispute resolution
- Regular audit of gaming platform by independent testing facility

#### **Access Controls:**

- Role-based access control (RBAC) for all systems
- Multi-factor authentication for privileged accounts
- Regular access reviews and privilege revocation
- Comprehensive logging of system access and changes

## **6. REPORTING AND OVERSIGHT**

### **6.1 Internal Reporting Structure**

| Report Type           | Frequency   |
|-----------------------|-------------|
| Financial Performance | Monthly     |
| Compliance Status     | Monthly     |
| AML Monitoring        | Weekly      |
| Security Incidents    | As Required |
| Risk Assessment       | Quarterly   |
| Responsible Gaming    | Monthly     |

### **6.2 Regulatory Reporting**

All regulatory reports to the Curacao Gaming Control Board are prepared and submitted by the Compliance Officer with oversight from the CEO.

- Annual financial statements with independent audit
- Quarterly operational reports
- Suspicious transaction reports as required
- Material changes to business operations or ownership
- Incident reports for security breaches or compliance failures

## **7. TRAINING AND COMPETENCE**

All staff receive comprehensive training appropriate to their role:

- Mandatory induction training for all new employees
- Annual AML/CFT refresher training
- Responsible gaming awareness training
- Information security and data protection training
- Role-specific technical and compliance training

- Training records maintained for all personnel

## **8. AUDIT AND REVIEW**

Regular independent audits ensure the effectiveness of internal controls:

- Annual external financial audit
- Bi-annual internal compliance audit
- Annual gaming platform certification
- Quarterly IT security assessment
- Annual AML/CFT compliance review

## **9. CONTINUOUS IMPROVEMENT**

Our management structure and internal controls are subject to regular review and enhancement based on:

- Regulatory changes and guidance updates
- Industry best practices and standards
- Internal audit findings and recommendations
- Risk assessment outcomes
- Technological developments
- Stakeholder feedback