

Operating Manual

Slotbox N.V.

Online Gaming Operations

Version 1.0

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Document Information	
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1. Description of Games Offered

1.1 Game Categories

Slotbox offers the following categories of games of chance through its gaming website:

- **Online Slots:** Video slots with varying themes, paylines, and bonus features
- **Table Games:** Virtual versions of blackjack, roulette, baccarat, and poker variants
- **Live Casino:** Real-time streamed games with live dealers (via Evolution and other providers)
- **Instant Win Games:** Scratch cards and other quick-play formats

1.2 Game Providers

Games are supplied by licensed, certified third-party providers integrated through the GiG Core platform:

Provider	Game Types
NetEnt	Slots, Table Games
Evolution	Live Casino
Pragmatic Play	Slots, Live Casino
Microgaming	Slots, Table Games, Progressive Jackpots
Red Tiger	Slots
Big Time Gaming	Slots (Megaways)
Quickspin	Slots
Relax Gaming	Slots, Aggregation
Push Gaming	Slots
Thunderkick	Slots

1.3 Outcome-Determining Elements

All game outcomes are determined by certified Random Number Generators (RNGs) operated by the respective game providers. Key characteristics:

- RNGs are independently certified by accredited testing laboratories (e.g., eCOGRA, iTech Labs, BMM Testlabs)
- Game outcomes are generated server-side by the game provider, not by Slotbox
- Each game round is independent and not influenced by previous results
- Theoretical Return to Player (RTP) percentages are published for each game

1.4 Stakes and Payouts

Stakes: Minimum and maximum bet limits vary by game and are displayed within each game interface. Players may also set personal stake limits through responsible gambling tools.

Payouts: Winnings are calculated according to each game's published payable. RTP typically ranges from 94% to 98% depending on the game. Progressive jackpot wins are paid in full.

Maximum Win Limits: Standard maximum win cap is €250,000 per bet (excluding progressive jackpots). Withdrawal limits are €4,000 daily, €16,000 weekly, and €50,000 monthly.

1.5 Payment Options

Accepted Currencies: EUR (primary operating currency), USD, GBP, CAD, NOK, INR, KRW, JPY, ZAR

Deposit Methods: Credit/Debit Cards (Visa, Mastercard), E-wallets (Skrill, Neteller), Bank Transfer, and other region-specific payment methods integrated via PaymentIQ.

Withdrawal Methods: Withdrawals follow a closed-loop policy, returning funds to the same method used for deposits where possible.

Minimum Deposit: €10 or currency equivalent. Minimum Withdrawal: €20 or currency equivalent.

2. Testing Methods and Quality Control

2.1 RNG Certification

All game providers are required to maintain current RNG certifications from accredited independent testing laboratories. Certificates are verified as part of the provider onboarding process and monitored for renewal. Testing laboratories include:

- eCOGRA (eCommerce Online Gaming Regulation and Assurance)
- iTech Labs
- BMM Testlabs
- GLI (Gaming Laboratories International)

2.2 Platform Testing

The GiG Core platform undergoes continuous testing:

- Automated unit and integration testing during development
- User Acceptance Testing (UAT) in staging environments before production deployment
- Load and performance testing to ensure system stability
- Security penetration testing and vulnerability assessments

2.3 ISO 27001 Certification

Gaming Innovation Group maintains ISO/IEC 27001:2017 certification (Certificate No. 238371) covering:

- Development, infrastructure, and network configuration
- Associated product operations for Front End, Middleware, and Back End Gaming Services
- GiG Core, GiG Endeavour, and Sportsbook platforms

2.4 Operational Monitoring

Continuous operational monitoring ensures service quality:

- 24/7 infrastructure monitoring with automated alerting

- Service Level Agreement (SLA) target of 99.9% platform availability
- Incident management with defined priority levels and response times
- Monthly operational summary reports provided to the operator

3. Data Storage

3.1 Data Center Location

All player data and operational data is stored at Equinix NL2 (AM6) data center in Amsterdam, Netherlands:

Facility	Equinix NL2 (AM6)
Location	Amstel Business Park Campus, Duivendrechtsekade 80A, 1096 AH Amsterdam
Infrastructure	2 x Dedicated Racks
IP Range	185.141.249.0/24

3.2 Personal Data Categories

The following personal data is collected and stored:

- Registration data: Name, date of birth, email address, phone number, residential address
- Verification documents: Government-issued ID, proof of address, payment method verification
- Transaction history: Deposits, withdrawals, bet history, game session logs
- Communication records: Support tickets, chat logs, email correspondence

3.3 Data Protection Measures

Encryption: All data is encrypted at rest using asymmetric encryption for database backups. Data in transit is protected via TLS encryption. VPN connections use IPsec.

Access Controls: Access is granted on a need-to-know basis with individual user accounts. Multi-factor authentication is required. Access rights are reviewed quarterly.

Network Security: DMZ architecture with active/passive firewalls. Internal networks are VLAN-segmented. DDoS protection via Cloudflare.

Data Retention: Player personal data is retained for a minimum of 7 years from the date of the last transaction, in compliance with AML/CFT and gambling license requirements.

3.4 Database Architecture

Primary databases run on Microsoft SQL Server in an Active-Active configuration with synchronous replication. A secondary replica in Malta maintains a 5-10 minute lag for legislative compliance requirements.

4. Visual Elements

4.1 Website Interface Overview

The Slotbox gaming website presents the following visual elements to players:

Homepage and Navigation

- Slotbox branding with logo prominently displayed
- Main navigation menu: Casino, Live Casino, Promotions, VIP Club
- Login/Registration buttons
- Game category filters and search functionality
- Featured games carousel with promotional banners

Game Lobby

- Game tiles displaying game name, provider logo, and thumbnail image
- Category tabs: Popular, New, Slots, Table Games, Live Casino, Jackpots
- Play for Real / Demo mode options where available

- Game information icons showing RTP and volatility where provided by game supplier

4.2 Player Account Area

- Account balance display (real money and bonus balances)
- Deposit and withdrawal interfaces with available payment methods
- Transaction history showing deposits, withdrawals, bets, and wins
- Profile settings and personal information management
- Document upload interface for KYC verification
- Active bonuses and wagering progress indicators

4.3 Responsible Gambling Elements

- Dedicated Responsible Gaming section accessible from footer on every page
- Limit-setting interfaces: deposit limits, loss limits, wager limits, session time limits
- Self-exclusion and cooling-off period request forms
- Session timer and reality check notifications
- Self-assessment questionnaire (Gamblers Anonymous 20 Questions)
- Links to problem gambling support organizations

4.4 Footer Information

The website footer displays on every page and includes:

- 18+ age restriction symbol and "No Under 18" notice
- Full legal name: Slotbox N.V.
- Registered address in Curaçao
- License information with interactive seal displaying current license details
- Links to: Terms & Conditions, Privacy Policy, Responsible Gaming, Complaints Procedure

- Payment method logos showing accepted deposit/withdrawal options
- Problem gambling support organization logos with links

4.5 Game Interface Elements

When a player launches a game, the following elements are displayed:

- Game frame with provider's native game interface
- Current balance display (updated in real-time)
- Bet amount selector
- Paytable and game rules accessible within the game
- Return to lobby functionality
- Session information showing time played and net win/loss

5. Technical Measures to Prevent Prohibited Persons

5.1 Age Verification

Pre-Registration: Players must manually enter their date of birth during registration. The system automatically rejects registration if the calculated age is below 18 (or higher where local law requires, e.g., 21 in Estonia).

Declaration: Players must explicitly confirm they meet the minimum legal age as a condition of completing registration.

Documentary Verification: Government-issued ID (passport, national ID card, or driver's license) is required for KYC verification. Verification is completed before the first withdrawal and may be triggered earlier based on risk thresholds.

5.2 Jurisdiction Restrictions

Players from restricted jurisdictions are blocked from accessing services:

- IP geolocation filtering blocks access from prohibited countries

- Registration country validation against restricted list
- Payment method verification to ensure funds do not originate from restricted jurisdictions

The full list of restricted countries is published in the Terms and Conditions and includes jurisdictions where online gambling is prohibited or not licensed, such as the United States, United Kingdom, France, Australia, and OFAC-sanctioned territories.

5.3 Self-Exclusion Enforcement

- Self-excluded players are blocked from logging in for the duration of their exclusion period
- Registration checks verify email, phone number, and address against exclusion database
- Payment method checks prevent excluded players from circumventing controls via new accounts
- Marketing suppression lists automatically remove self-excluded players from promotional communications

5.4 Fraud and Multi-Account Detection

- Device fingerprinting to identify multiple accounts from the same device
- IP address analysis and mismatch alerts (registration country vs. login IP)
- Shared payment method detection with automated alerts
- Behavioral analysis via GiG Logic rules engine for suspicious patterns

5.5 AML/KYC Compliance

Customer due diligence procedures prevent money laundering and terrorist financing:

- PEP (Politically Exposed Persons) screening via C6 integration
- Sanctions list screening (OFAC, EU, UN lists)

- Transaction monitoring via KYCP/Axon for suspicious activity detection
- Enhanced Due Diligence (EDD) for high-risk customers including Source of Wealth verification
- KYC threshold triggers: NAF 4000 requires full verification, full verification required within 30 days, NAF 5000 is mandatory threshold for transactions

6. Technical Infrastructure and Recovery Procedures

6.1 Infrastructure Overview

The gaming platform is hosted at Equinix NL2 data center in Amsterdam with the following architecture:

Network Layer

- Cloudflare DDoS protection and CDN at the edge
- Active/Passive firewall pair for perimeter security
- Load balancers (keepalive configuration) distributing traffic to application servers
- VLAN-segmented internal network isolating different service tiers

Compute Layer

- VMware ESXi hypervisor cluster with N+2 redundancy
- HPE ProLiant DL385 Gen10+ physical servers
- Horizontally scaled application servers (no single point of failure)

Storage Layer

- HPE Primera A650 SAN for primary storage with fiber channel connectivity
- Supermicro backup storage server for VM and database backups
- Redundant array configuration with N+1 hardware redundancy

Database Layer

- Microsoft SQL Server in Active-Active configuration
- Synchronous replication to secondary server with automatic failover
- Asynchronous replication to Malta datacenter (5-10 minute lag)

Supporting Services

- Redis cluster for session caching and real-time data
- RabbitMQ cluster for message queuing
- Elasticsearch cluster for logging and search functionality

6.2 Backup Procedures

Component	Backup Frequency	Retention
Virtual Machines	Daily incremental, weekly full	30 days incremental, 90 days full
Databases (Transaction Logs)	Every 5 minutes	7 days
Databases (Full)	Daily differential, weekly full	30 days differential, 1 year full
Configuration Files	On change + daily	90 days

All backups are encrypted using asymmetric encryption and stored on dedicated backup storage with off-site replication.

Curaçao Data Replication & Compliance

In compliance with Curaçao Gaming Authority (CGA) requirements for local data accessibility and protection, Slotbox N.V. maintains a comprehensive data replication arrangement with Hosting B2B, which operates from a Tier IV certified data center located in Curaçao. Critical player data is transmitted and stored on a weekly basis, including player IDs, account details, deposit records, betting activity, wins/losses, and account balances. All data is protected through end-to-end encryption

6.3 Recovery Procedures

Recovery Time Objective (RTO): 4 hours for critical systems

Recovery Point Objective (RPO): 5 minutes for transactional data

In the event of a technical emergency, the following recovery procedures are activated:

1. Automated monitoring detects failure and triggers alerts to operations team
2. Service Operations Team assesses impact and activates incident response
3. Failover to redundant systems activated (automatic for most scenarios)
4. Database recovery from transaction logs if needed (point-in-time recovery)
5. VM restoration from backup if hardware failure affects multiple servers
6. Service verification and customer communication

7. Responsible Gambling Implementation

7.1 Policy Overview

Slotbox is committed to providing a safe, fair, and responsible gaming environment. A designated Responsible Gaming Officer oversees implementation and enforcement of responsible gambling measures.

7.2 Player Protection Tools

Financial Limits

- **Deposit Limits:** Daily, weekly, and monthly caps set by the player. Decreases apply immediately; increases require a 24-hour cooling-off period.
- **Loss Limits:** Maximum net loss permitted over a defined period.
- **Wager Limits:** Maximum total stakes over a period.
- **Session Time Limits:** Restrict active playtime per session or per day.
- **No credit policy:** Strictly enforced for all players

Time-Based Controls

- **Cooling-Off Period (Time-Out):** Short-term breaks of 24 hours, 7 days, or 30 days. Irrevocable once set.
- **Self-Exclusion:** Long-term exclusion options of 1, 3, 5, or 10 years, or lifetime. Completely blocks account access.
- **Reality Checks:** Periodic notifications showing session duration and net position.

7.3 Player Monitoring and Intervention

Automated and manual monitoring identifies players showing signs of problem gambling:

- Sudden increases in deposit frequency or amounts
- Extended session durations or late-night gambling patterns
- Repeated failed deposit attempts
- Withdrawal cancellations (potential loss-chasing behaviour)
- Communications indicating distress or desperation

When risk indicators are detected, trained staff may contact the player to offer support and tools, or apply mandatory protective measures including limits or operator-initiated exclusion.

7.4 Information and Support

- Dedicated Responsible Gaming section with educational content
- Self-assessment questionnaire (Gamblers Anonymous 20 Questions)
- Links to support organizations: Gamblers Anonymous, BeGambleAware, Gambling Therapy
- Information on parental control software and gambling-blocking tools

7.5 Marketing Standards

- No targeting of minors or vulnerable persons

- Self-excluded players suppressed from all marketing communications
- Responsible gambling messaging included in promotional materials
- No claims that gambling leads to financial success

8. Terms and Conditions

The complete Terms and Conditions are available on the website at slotbox.com

Key provisions include:

8.1 Eligibility

- Minimum age of 18 (or higher where local law requires)
- Players from restricted jurisdictions are prohibited
- One account per person (multi-accounting prohibited)

8.2 Account Rules

- Accurate registration information required
- KYC verification mandatory before withdrawal when threshold met
- Account security is player's responsibility
- No third-party use of accounts permitted

8.3 Financial Terms

- Accepted currencies and conversion practices
- Deposit and withdrawal limits and processing times
- Wagering requirement on deposits before withdrawal
- Closed-loop withdrawal policy

8.4 Game Rules

- Players acknowledge understanding of game rules

- Server logs are the final authority on game outcomes
- Void bets in case of technical errors or manipulation

8.5 Bonus Terms

- Wagering requirements specified for each bonus
- Bonus abuse results in forfeiture and potential account closure

8.6 Governing Law

Terms and Conditions are governed by the laws of Curaçao. Players submit to the exclusive jurisdiction of Curaçao courts for dispute resolution.

9. Dispute Resolution

9.1 Internal Complaints Process

Slotbox maintains a formal complaints handling procedure:

Stage 1: Customer Support

Players may contact Customer Support via live chat or email (support@slotbox.com). Support agents attempt to resolve issues immediately where possible.

Stage 2: Formal Complaint

If unresolved at Stage 1, players may submit a formal complaint via the Complaint Submission Form or by email to complaints@slotbox.com. Required information includes: player name, account details, date of incident, description of issue, and desired resolution.

9.2 Response Timeframes

Milestone	Timeframe
Acknowledgment (Standard)	Within 7 days
Acknowledgment (Responsible Gambling)	Within 2 days

Final Response (Standard)	Within 4 weeks (extendable to 8 weeks)
Final Response (Responsible Gambling)	Within 5 business days (extendable to 3 weeks)

9.3 Alternative Dispute Resolution (ADR)

If a player remains dissatisfied after receiving the final internal response, they may escalate the dispute to an independent Alternative Dispute Resolution provider at no cost. The ADR provider details are:

- ADR details will be published in the Terms and Conditions
- ADR will be available free of charge to the player

9.4 Complaint Records

All complaints are logged in a central Complaints Register including: date received, player details, issue summary, category, actions taken, and outcome. Records are retained for a minimum of 5 years. Bi-annual complaints reports are to be submitted to the regulator.

10. Digital Records

10.1 Player Records

The following player information is maintained digitally:

- Registration data: Full name, date of birth, address, email, phone number, registration date/time
- Verification status: KYC documents submitted, verification date, verified by whom
- Account status: Active, suspended, self-excluded, closed
- Responsible gambling settings: Active limits, self-exclusion history

10.2 Game Transaction Records

- Bet ID and timestamp

- Player account ID
- Game name and provider
- Stake amount and currency
- Win/loss amount
- Game round ID (from provider)
- Balance before and after transaction

10.3 Financial Transaction Records

- Transaction ID and timestamp
- Transaction type: Deposit, withdrawal, bonus credit, adjustment
- Amount and currency
- Payment method and provider reference
- Status: Pending, completed, failed, cancelled
- Source/destination of funds (masked payment details)

10.4 Data Retention

All records are retained for a minimum of 7 years from the date of the last transaction, in compliance with AML/CFT requirements and gambling license conditions. Data is stored in encrypted databases with full audit logging of access.

10.5 Regulatory Access

All digital records are accessible to the regulator upon request. The system supports data export in standard formats for regulatory inspection. Real-time access can be provided via secure authenticated API connections where required.

FIU goAML portal for unusual transaction reporting

11. Staff Training & Competency

Slotbox N.V. maintains a comprehensive annual training programme to ensure all staff are equipped with the knowledge and skills necessary to fulfil their

responsibilities in compliance with the LOK and CGA requirements. Training is delivered upon onboarding and refreshed annually thereafter, with content tailored to individual roles and responsibilities.

Core Training Topics

All relevant staff receive training covering the following mandatory areas:

- **Responsible Gambling:** Recognition of problem gambling indicators, player protection tools (limits, cooling-off, self-exclusion), intervention procedures, and signposting to support resources.
- **Anti-Money Laundering (AML) & Counter-Terrorism Financing:** Customer due diligence (CDD), enhanced due diligence (EDD), suspicious activity identification, unusual transaction reporting (UTR) procedures, and goAML portal obligations.
- **Crime Prevention & Anti-Bribery:** Fraud awareness, anti-bribery and corruption policies, reporting channels for suspected criminal activity, and ethical conduct standards.
- **Player Communication:** Professional and empathetic communication standards, handling sensitive conversations, complaint management procedures, and escalation protocols.
- **Responsible Advertising & Marketing:** Compliance with advertising codes, prohibition on targeting minors and vulnerable persons, truthful messaging requirements, and responsible gambling taglines.
- **Mental Well-being:** Staff welfare awareness, recognising signs of distress in colleagues and players, access to support resources, and maintaining personal well-being in a gaming environment.

Role-Specific Training

Training content is tailored according to job function:

Role	Additional Focus Areas
Customer Support	Player interaction, RG tool activation, complaint handling, vulnerable player identification
Compliance & MLRO	Regulatory reporting, CGA liaison, policy development, audit preparation

Role	Additional Focus Areas
VIP & Account Management	High-value player monitoring, enhanced RG vigilance, AML red flags
Marketing	Advertising compliance, affiliate oversight, promotional terms accuracy
IT & Technical	Data protection, cybersecurity awareness, system access controls
Finance & Payments	Transaction monitoring, fraud detection, closed-loop payment compliance

Training Delivery & Records

- Training is delivered through a combination of e-learning modules, in-person sessions, and practical assessments.
- Completion is mandatory; staff who do not complete required training within specified timeframes may have access to systems restricted.
- All training records, including completion dates, topics covered, and assessment outcomes, are maintained for a minimum of five (5) years and are available for CGA inspection upon request.

Annual Review

The training programme is reviewed annually and updated to reflect changes in legislation, regulatory guidance, internal policy updates, and lessons learned from incidents or audits. The Compliance Officer is responsible for overseeing the training programme and ensuring ongoing effectiveness.