

BARRON O'DONNELL LLP

SOLICITORS

1st Floor, Cedar House, Main Street, Ballybofey, Co. Donegal, F93 R158, DX 63007 Ballybofey
Tel: 074 91 89400 | Fax: 074 91 89401 | Email: info@bods.ie

Mr. Conor O'Donnell,
Slotbox N.V. (Curacao entity)
Slotbox Limited (Cyprus entity)
Chytron, 30, 2nd Floor,
Flat/Office, A22 1075,
Nicosia,
Cyprus.

Our Ref: EOD/DC/ 1825

16th June 2021

Re: On-line Gaming Query

Dear Conor,

I refer to your query regarding the processing of transactions for online gaming services by regulated offshore companies. I understand that your online gaming website is operated by Slotbox N. V. a licenced Curacao registered company and by Slotbox Limited a Cyprus registered company. The Cyprus registered company is 100% subsidiary of the Curacao registered company.

It is my understanding that online gaming services are available in Ireland by regulated offshore companies. Online gaming in Ireland is not regulated at this time with the exception of online betting and all operators in the Irish Market are required to comply with money laundering legislation. This position may change in the future particularly if a regulator is appointed.

In the absence of legislation at the present time it appears that it is not illegal for regulated offshore companies to offer online gaming services in Ireland and accept/process transactions for Irish customers (including credit/debit card transactions) subject to compliance with the obligations of the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010, as amended. This legislation prescribes that gambling service providers are designated persons under the legislation.

Please note that our advices to you are for your exclusive benefit. No third party is entitled to rely on our advice. This office accepts no responsibility to third parties for any aspect of our advices that is made available to them.

Yours sincerely,



Elizabeth O'Donnell
Barron O'Donnell
Enc.