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2/OL/PAT MISC

22nd August 2025

Slotbox Limited
1 Avlonos street,
Maria House, 1075
Nicosia, Cyprus

RE: Legal Opinion on the Regulatory Status of Online Gambling Operations in Northern Ireland by Slotbox Limited

We have been instructed by our client, Slotbox Limited ("the Company"), relying on our gaming and lottery experience, to provide a formal legal opinion to payment processors concerning the regulatory framework governing the provision of its online gambling services to customers located in Northern Ireland.

This opinion is based on the facts provided to us by the Company and our analysis of the relevant United Kingdom statutes. Its purpose is to provide clear, evidence-based assurance that the Company's operations in Northern Ireland are compliant with applicable law, in my opinion

2. Factual Background (As Instructed by the Company)

We are instructed by the Company as follows:

- **Licensing:** The Company's contracting entity, Slotbox Limited, operates under a European Union gaming licence issued by the Estonian Tax and Customs Board (Licences: HKL000346, HKT000062). The parent company also holds a Curacao gaming license. Under neither license mentioned above, is Northern Ireland a restricted jurisdiction.
- **Operational Posture:** The brand does not advertise to or accept customers that are within the remit of UKGC. This includes England, Scotland and Wales. The Company does not advertise to UK customers, has no servers in the UK, provides no local support phone number, and maintains no office or representative in the UK.
- **Market Separation:** The Company actively avoids business with customers in Great Britain (England, Scotland, and Wales) through various technical measures such as blocking of registrations from customers that are within UKGC remit and blocking deposits from customers within remit of UKGC remit.
- **Northern Ireland Activities:** The Company does not actively run advertisements in Northern Ireland.

3. Analysis of United Kingdom Gambling Law

A correct understanding of UK law requires differentiating between the legal regimes of Great Britain and Northern Ireland

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A. The Regulatory Framework in Great Britain

The primary legislation is the Gambling Act 2005, which established the UK Gambling Commission (UKGC). The UKGC oversees a mandatory licensing regime for all operators serving customers in Great Britain, with licence classifications for operators, key personnel, and physical premises.

B. The Distinct Regulatory Framework for Northern Ireland

Northern Ireland's legal framework is separate.

1. Primary Local Legislation: The governing statute is the Betting, Gaming, Lotteries and Amusements (Northern Ireland) Order 1985. This pre-internet legislation contains no provisions for the licensing or regulation of online casinos.

2. The Gambling (Licensing and Advertising) Act 2014: This UK-wide Act creates a clear legal distinction between the act of operating and the act of advertising in the context of Northern Ireland.

o The Operating Offence (Limited to Great Britain): Section 1 of the 2014 Act amends the 2005 Act to create a "point of consumption" offence. However, the statutory text explicitly limits this offence to facilities being used "in Great Britain".

o Territorial Extent: Section 6 of the 2014 Act confirms this separation. Section 6(3) states that the provisions relating to the operating offence (including Section 1) "extend to England and Wales and Scotland only."

4. Legal Opinion

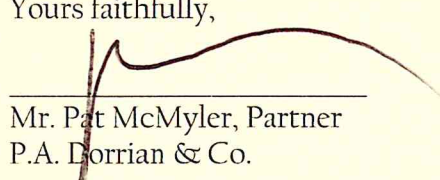
Based on our analysis of the applicable statutes and the facts as instructed by the Company, it is our opinion that:

1. The requirement under UK law to hold a UKGC operating licence for remote gambling is statutorily limited to operators providing facilities to customers in Great Britain. This requirement does not extend to Northern Ireland.

2. Provided the Company continues to refrain from advertising, its acceptance of customers from this region on a passive basis does not constitute a licensable activity under UK law and is not an offence.

In my opinion, the processing of payments for the Company's customers located in Northern Ireland is legally permissible and does not expose a payments provider to the regulatory risks associated with unlicensed gambling, as the Company's activities do not require a UKGC operating licence. The Company's operational model, as described to me, appears to be structured in compliance with the relevant provisions of the Gambling (Licensing and Advertising) Act 2014.

Yours faithfully,


Mr. Pat McMyler, Partner
P.A. Dorrian & Co.

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