

OPERATIONS MANUAL

Prepared in compliance with the

National Ordinance on Games of Chance (LOK)

Curaçao Gaming Authority (CGA)

Licensee	Medium Rare N.V.
Brand / Website	Stake.com
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1. Introduction

This Operations Manual has been prepared by Medium Rare N.V. (the company that operates Stake.com) in fulfilment of the obligation set out in Article 5.9 of the National Ordinance on Games of Chance (LOK) of Curaçao. It describes how Stake.com operates its remote gaming business, how it meets the rules and conditions of its Gaming License, and how it protects players.

This document must be always kept up to date and made available to the Curaçao Gaming Authority (CGA) for inspection within five (5) working days of any request (Article 5.9, paragraph 3 of the LOK).

1.2 Scope and Purpose

This manual covers all aspects of Stake.com's remote gaming operations, including:

- The games we offer and how they work
- How we test and monitor game quality
- How we protect players' personal data
- What players see on our website and apps
- How we prevent banned persons from playing
- Our technical systems and disaster recovery plans
- How we implement responsible gaming
- Our general terms and conditions
- How we handle player complaints and disputes
- How we store and report player and transaction data
- How we train our staff

2. Games of Chance

2.1 Overview of Games Offered

Stake.com offers a comprehensive portfolio of Remote Games of Chance across the following categories:

Category	Examples	Outcome Determined By
Casino — Slots	Video slots, classic slots, megaways	Certified RNG
Casino — Live Games	Live Blackjack, Live Roulette, etc.	Physical deal/spin + RNG



Stake Originals	Crash, Dice, Mines, Plinko, Limbo, etc.	Certified RNG
Sports Betting	Football, Basketball, Tennis, eSports, etc.	Real-world event outcomes

2.2 Payment Methods

Stake.com accepts deposits and processes withdrawals via the following methods:

- Cryptocurrencies: Bitcoin (BTC), Ethereum (ETH), Litecoin (LTC), Ripple (XRP), Dogecoin (DOGE), Tron (TRX), and others as approved
- Fiat currencies via third-party payment processors (where permitted by jurisdiction)
- All deposits are credited to the player's Stake wallet after the required blockchain confirmations
- Withdrawals are processed within the timeframes stated in the General Terms & Conditions

2.3 Payouts and Return-to-Player (RTP)

All Games of Chance offered on Stake.com have documented payout percentages (RTP). These are:

- Certified by independent testing laboratories (e.g., GLI, iTech Labs, or equivalent)
- Displayed within each game's information/help section or on a dedicated RTP page
- For Stake Originals: published on the Stake Provably Fair page with cryptographic verification
- For sports betting: determined by the applicable odds at the time of bet placement

2.4 Software and Outcome-Determining Elements

RNG Software	Certified third-party and proprietary RNG engines
Provably Fair System	Stake Originals use a provably fair cryptographic algorithm; players can verify every outcome
Third-Party Providers	Games supplied by licensed providers (e.g., Evolution, Pragmatic Play, Hacksaw Gaming, etc.)
Live Games	Operated by licensed live gaming studios; outcomes determined by physical equipment + RNG
Sports Betting Engine	In-house + third-party odds feed providers; outcomes from verified real-world events
Software Certification	All game software certified before launch; re-certified after material changes



2.5 Bet Amounts - Minimum and Maximum

Stake.com enforces minimum and maximum bet limits across all game categories available on the platform. Limits are technically configured and enforced at the platform level and, where applicable, at the game provider level, prior to any transaction being processed.

The following table sets out the minimum and maximum bet limits per game category. All amounts are expressed in USD equivalent. Actual bets are processed in supported cryptocurrencies and fiat currencies at prevailing exchange rates.

Game Category	Min Bet (USD equiv.)	Max Bet (USD equiv.)
Stake Originals	\$0.00	\$1,000,000
Slots	\$0.03	\$2,000
Live Casino	\$0.10	\$250,000

Sportsbook betting limits on Stake.com are dynamic in nature and are not subject to fixed minimum or maximum thresholds.

3. Quality Monitoring and Test Methods

3.1 Testing Framework

Stake.com maintains a rigorous quality assurance and testing framework to ensure all games operate correctly, fairly, and in compliance with the Gaming License. The following test methods are applied periodically:

Test Type	Description
RNG Certification	Independent lab testing of RNG outputs for randomness and unpredictability
Game Logic Testing	Functional testing of game rules, payout calculations, and win/loss logic
Platform Penetration Testing	Security testing to identify and fix vulnerabilities in the gaming platform

Performance Load Testing	Stress testing to ensure platform stability under high traffic
Payout Verification	Automated reconciliation of bet amounts vs payouts to detect discrepancies
AML Transaction Monitoring	Automated flagging of unusual or suspicious transaction patterns
Compliance Assessment	Self-Internal review of compliance with all LOK obligations

3.2 Third-Party Test Laboratories

Stake works with CGA-accepted independent testing laboratories, which may include iTech Labs, eCOGRA, and GLI (Gaming Laboratories International). All certification reports are retained and made available to the CGA on request.

3.3 Incident-Triggered Testing

In addition to scheduled testing, ad hoc testing is initiated whenever:

- A player disputes a game outcome
- An unexpected game error or technical fault is reported
- Suspicious payout patterns are detected
- A third-party provider releases a material software update

4. Player Personal Data Storage

4.1 Data Storage Principles

Stake.com collects, stores, and processes player personal data in accordance with applicable data protection laws and the conditions of the Gaming License. The following principles govern all data handling:

- Data is collected only for specified, explicit, and legitimate purposes
- Players are informed of data collection at registration via the Privacy Policy
- Personal data is stored securely using industry-standard encryption.
- Access to personal data is restricted to authorised personnel on a need-to-know basis
- Data retention periods comply with applicable legal requirements

4.2 Categories of Data Stored



Data Category	Examples	Retention Period
Identity / KYC Data	Name, DOB, address, ID document, selfie	5 years post account closure
Account Data	Username, email, password, preferences	Duration of account +5 years
Transaction Data	Deposits, withdrawals, bet history, balances	5 years (AML compliance)
Communication Records	Support tickets, emails, chat logs	5 years
Responsible Gaming Data	Self-exclusion requests, deposit limits, flags	Lifetime
Technical / Log Data	IP addresses, session logs, device identifiers	5 years
CGA Critical Records	Gaming transactions and financial transactions	Tier-IV server, available to CGA

5. Visual Elements and Player-Facing Interface

5.1 Website Interface

The Stake.com gaming interface always presents the following key visual elements to players:

Visual Element	Description
Account Balance Display	Player's real-money and bonus balance always shown prominently in the header
Responsible Gaming Banner	Permanent responsible gaming link/icon in the footer and navigation; links to self-exclusion tools
Game Rules / Help Section	Every game includes a clearly labelled '?' or 'Info' button containing full rules, RTP, and payable



Currency Selector	Players can switch between supported cryptocurrencies and fiat currencies via a visible selector
Session Information	Session duration visible in responsible gaming tools
Licensing Information	CGA license number and validity status displayed in the website footer
Provably Fair Indicator	For Stake Originals: a verifiable seed hash is displayed during and after each game round
Deposit / Withdrawal Status	Real-time status of pending transactions is made visible to users through the website user profile interface.
Self-Exclusion / Limits Access	Direct link to responsible gaming tools (deposit limits, self-exclusion) accessible from every page
Restricted Jurisdiction	Players from restricted jurisdictions see a clear block page with reason and no access to games

6. Prevention of Banned Persons from Playing

6.1 Overview

Stake.com has implemented a layered system to prevent persons who are banned under the National Ordinance including Vulnerable Persons and self-excluded players from accessing or playing Games of Chance on the platform.

6.2 Categories of Banned / Restricted Persons

- Minors (persons under 18 years of age)
- Persons who have voluntarily self-excluded from Stake.com
- Players from jurisdictions restricted under Stake.com's license conditions
- Persons flagged by court order or CGA instruction

6.3 Technical Measures in Place



Measure	How It Works
Age Verification at Registration	All players must confirm they are 18+ during registration. KYC verification (government-issued ID) is required before first withdrawal and triggered by risk-based parameters. Accounts where age cannot be verified are suspended.
KYC / Identity Verification	Players are required to submit identity documents (passport, national ID, or driving licence). Accounts are verified via automated and manual review using third-party KYC providers. Unverified accounts have deposit and withdrawal restrictions.
Geolocation & IP Blocking	Players accessing from restricted jurisdictions are automatically blocked at login. IP addresses are checked against a restricted jurisdiction list in real time. VPN detection tools are employed to prevent circumvention.
Self-Exclusion Database	When a player self-excludes, their account is immediately suspended. The player's details are entered into an internal exclusion database. Any new registration attempts with matching identifiers (email, name, DOB, payment method) are flagged and blocked.
Duplicate Account Detection	Automated systems detect duplicate registrations using email, payment method, and identity data. Flagged accounts are manually reviewed and suspended if linked to a banned player.
Court Order / CGA Instruction Blocking	Players subject to court orders or CGA instructions are blocked immediately upon receipt of the instruction. The Compliance team maintains a record of all such blocks.

7. Technical Infrastructure and Disaster Recovery

7.1 Infrastructure Overview



Stake.com operates on a globally distributed infrastructure designed for high availability, resilience, and data security. Critical components include:

- Primary data centre: Tier-IV certified data centre registered in Curaçao (for CGA-required records)
- Gaming servers: Distributed cloud infrastructure (primary and secondary regions)
- Database layer: Replicated database clusters with automated failover
- CDN: Global content delivery network for low-latency player experience
- DDoS protection: Enterprise-grade DDoS mitigation on all public-facing endpoints
- Firewall and intrusion detection: WAF (Web Application Firewall) + IDS/IPS monitoring

7.2 Disaster Recovery and Business Continuity

Recovery Objectives

System	Recovery Time Objective (RTO)	Recovery Point Objective (RPO)
Full AWS site failover	2 hours	Zero (no data loss)
Single service restoration	1 hour	Zero (no data loss)
Database recovery	30 minutes	Variable (near zero)
CDN / edge network	30 minutes	Zero (no data loss)

Continuity Strategy by System

System	Provider	Continuity Mechanism
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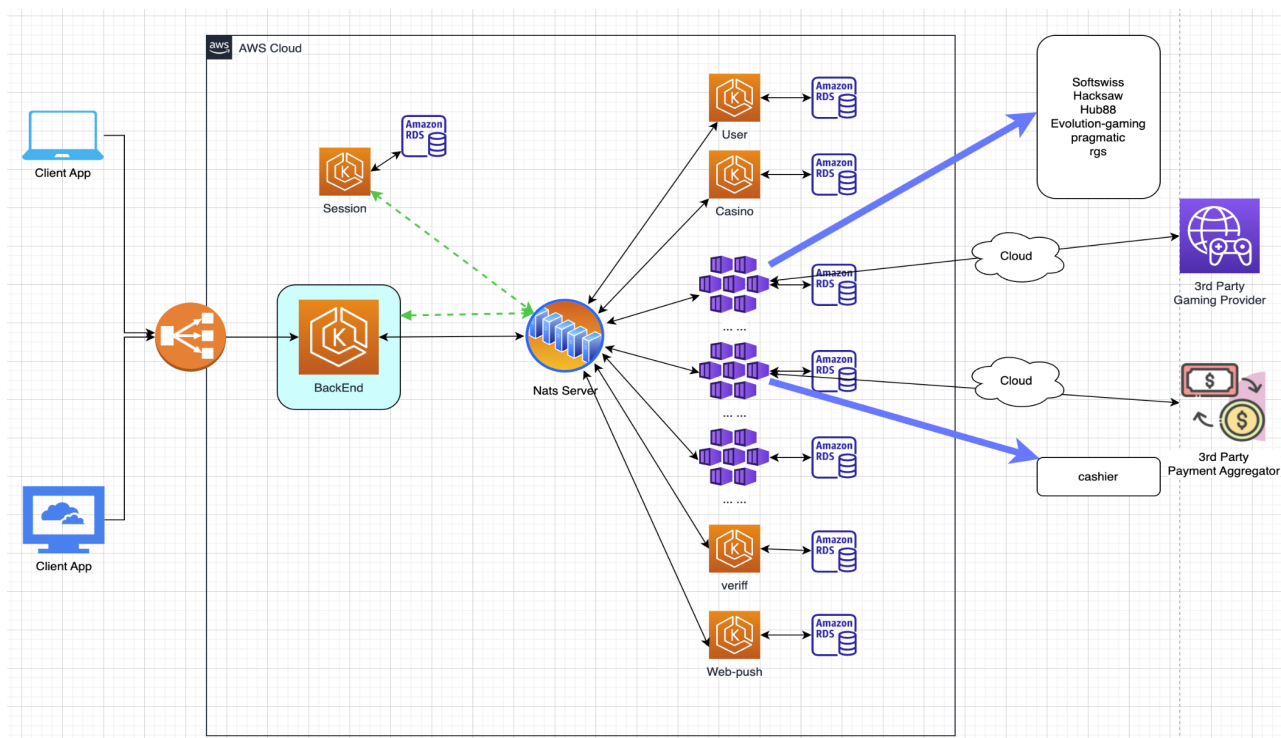


Core platform hosting	AWS (multi-AZ)	Automatic failover across availability zones
Web delivery / DDoS protection	Cloudflare Enterprise	Global anycast network; instant traffic rerouting
Email & communications	Google Workspace + Mimecast	Dual-layer redundancy with Mimecast continuity mode
Secure remote access	Zero Trust VPN	Identity-based access; no single point of failure
Infrastructure provisioning	IaC (Terraform/Ansible)	Full environments rebuild from code within RTO

Plan Activation Triggers

Trigger Type	Examples
Technical outage	AWS regional failure, database corruption, CDN disruption
Cyber incident	Ransomware, DDoS attack, data breach
Physical disruption	Office/facility unavailable, loss of key personnel

7.3 Technical Architecture Diagram



8. Responsible Gaming Policy and Implementation

8.1 Policy Statement

Stake.com is committed to offering games in a safe, responsible, and transparent manner. The protection of players — especially Vulnerable Persons — is a core operational priority. Our Responsible Gaming Policy is implemented across all touchpoints of the platform.



8.2 Responsible Gaming Tools Available to Players

Tool	Description
Deposit Limits	Players can set daily, weekly, or monthly deposit limits. Decreases take effect immediately; increases require a 24-hour cooling-off period.
Wager / Loss Limits	Players can set limits on total bets or losses per period.
Session Time Limits	Players can limit the duration of each gaming session.
Reality Check	Players can set pop-up reminders showing time played and amounts wagered at regular intervals.
Cool-Off Period	Players can take a break from gaming for 24 hours, 7 days, 30 days or 3 months. During this period deposits and wagering are blocked; withdrawals remain permitted.
Self-Exclusion	Players can self-exclude for a minimum of 12 months (per Art. 5.4 LOK). This is irrevocable for the exclusion period. The player's account is immediately closed and they are added to the exclusion database.
Account Closure	Players can permanently close their account at any time via account settings or by contacting support.

8.3 Responsible Gambling Intervention Programmed

Stake applies a four-step approach: identify at-risk behaviour, evaluate risk indicators, intervene, and measure efficacy.

Player data is assessed through Stake's internal RG Risk Matrix, informed by the DSM-5. Risk indicators are monitored across five categories: personal/account data, deposit behaviour, communication patterns, wagering behaviour, and time spent playing.



Interventions are applied according to the risk level identified:

Level	Risk	Action
1–2	Low	Email — educate player on RG tools
3	Medium	Email — notify of behaviour change; strongly suggest RG tools
4	High	Email or phone call — direct engagement; may result in imposed limits, cool-off, or self-exclusion
5	Critical	Verbal or written contact; player self-excluded by Stake; external help organisations signposted; local authorities contacted if safety is at risk

Where a player is assessed as no risk, no intervention is made but the assessment outcome is retained for records.

Activity restrictions (blocking deposits and wagering) may be imposed following a Level 4 intervention. Account access and withdrawals must remain available during any restriction.

8.4 Evaluation

The Responsible Gambling programme is evaluated quarterly, covering: intervention hit rates by risk level, engagement rates on RG communications, monthly quality assurance reviews, and feedback from industry partners and internal stakeholders. Changes are implemented where the programme is found to be ineffective.



9. General Terms and Conditions

9.1 Overview

The most recent version of Stake.com's General Terms and Conditions (T&Cs) is incorporated into this Operations Manual by reference. The T&Cs govern the relationship between the player and Medium Rare N.V. and are binding on all registered players.

9.2 Key T&C Elements

Governing Law	Curaçao law (as required by Article 5.5 LOK)
Dispute Jurisdiction	Curaçao courts (as required by Article 5.5 LOK)
Eligibility	Must be 18+; not a Vulnerable Person; not in a restricted jurisdiction
Account Rules	One account per person; accounts are non-transferable
Deposits	Minimum / maximum amounts per method; currency conversion rules
Withdrawals	KYC required; processing times; same-method withdrawal policy
Bonuses	Wagering requirements, expiry, eligible games disclosed per promotion
Prohibited Activities	Collusion, fraud, bonus abuse, use of bots, multiple accounts
Account Closure	Right to close account
Amendments	T&Cs may be updated; players notified by email; continued play = acceptance
VPN and proxy prohibition	Use of VPN's, IP masking. Proxy networks, or location-spoofing tools are strictly prohibited and may result in account termination and forfeiture of balance.

9.3 Availability

The full General Terms and Conditions are:

- Published on stake.com/terms (available in English and other supported languages)
- Displayed at account registration (player must actively accept before completing registration)
- Accessible from every page via the footer link

10. Player Complaints and Dispute Resolution

10.1 How to Submit a Complaint

Any player may submit a complaint to Stake.com free of charge within six (6) months of the incident giving rise to the complaint. Complaints may be submitted via:

- Live Chat on stake.com (available 24/7)
- Email for general complaints: Complaints@stake.com
- For DSAR: Dpo@stake.com
- The dedicated complaints form in the player's account portal

10.2 Complaint Handling Process

Step	Action	Timeframe
Acknowledgement	Player receives written acknowledgement of complaint receipt, including how it will be handled	Within 1 week of receipt
Investigation	Complaints team investigates the issue; reviews logs, transaction records, and communications	Within 4 weeks of receipt
Decision	Player notified of: (a) decision not to process the complaint and reason; OR (b) final ruling with supporting details recorded in writing	Within 4 weeks)
Extension	If more time is needed, player is notified in writing of the extension (maximum 4 additional weeks)	Written notice before 4-week deadline
ADR	If the player is unsatisfied with the outcome, they are referred to the Alternative Dispute Resolution (ADR) provider at no cost to the player	Available at any time (Art. 5.3.(6) LOK)

10.3 Alternative Dispute Resolution (ADR)

In accordance with Article 5.3, paragraphs 6 and 7 of the LOK, Stake.com offers all players access to an independent Alternative Dispute Resolution (ADR) service:

- The ADR service is offered at no cost to the player
- The ADR provider is a CGA-approved body
- The ADR service is available even if a complaint decision has already been issued



11. Digital Records and CGA Data Access

11.1 Record-Keeping Obligations

Stake.com maintains comprehensive digital records in accordance with Article 5.9(1)(j) and Article 5.11 of the LOK. These records clearly always show:

- The rights and obligations of Stake.com (licensee)
- The rights of each player
- Full audit trail to demonstrate compliance with the LOK

11.2 CGA-Accessible Critical Data

In accordance with Article 5.9(1)(j) of the LOK, the following critical digital records for stake.com users are maintained and made available to the CGA through daily aggregated reporting hosted on a Tier-IV certified data centre registered in Curaçao:

- User ID
- Total deposits
- Total winnings
- Total losses
- Total withdrawals
- Total bets placed
- Total game types played

The Company maintains cloud-hosted infrastructure with a replicated copy of all critical regulatory data securely hosted within Curaçao to ensure uninterrupted accessibility, regulatory oversight, and compliance with CGA requirements.

These records are accessible to the CGA through the central control database and reporting system maintained in accordance with Article 5.10 of the LOK.

11.3 Reporting to the CGA

Stake.com provides the CGA with the following mandatory reports:

Report Type	Content	Deadline
Amendment Report	Updates to this Operations Manual + changes to operations	Twice yearly: by 15 June & 15 January



Incident Report	Security breaches, technical failures, fraud, suspicious events	Within 24 hours of incident
Gambler Transaction Report	Total credits/debits per gaming account, payment methods, per domain name	As requested by CGA
Annual Financial Statements	Audited financial statements of Medium Rare N.V.	By 30 June of the following year (Art. 5.11.3 LOK)
Interim Financial Reports	Where requested by CGA	Within timeframe set by CGA

12. Staff Training and Permanent Education

12.1 Training Obligation

Stake.com provides permanent education to all persons working in connection with its Games of Chance operation. Training is provided on an annual basis, at minimum, and is tailored to each role's level of knowledge and responsibility.

12.2 Mandatory Annual Training Topics

All staff are trained on the following topics each year, as required by Article 5.9(4) of the LOK:

Training Topic	Description
Mental Health & Well-Being	Recognising and supporting player mental health; internal employee well-being resources
Anti-Bribery & Corruption	Identifying and refusing bribes; reporting obligations; Stake's zero-tolerance policy
Fraud Awareness	Fraud detection, match-fixing awareness, cybercrime risks
Responsible Gaming	Problem gambling identification; use of RG tools; player intervention procedures



Anti-Money Laundering (AML)	AML obligations under LOK and the National Ordinance on Unusual Transactions; goAML reporting; KYC procedures
Communication with Players	Professional and compliant player communication standards; handling sensitive disclosures
Responsible Advertising	Advertising standards under Art. 5.6 LOK; prohibited content; targeting restrictions

12.3 Role-Based Training

Training depth is calibrated to the role:

Customer Support Staff	RG tools, complaint handling, AML red flags, communication standards
Compliance & Legal Team	Full LOK compliance requirements, AML reporting, KYC procedures, CGA interaction
Technical / IT Staff	Data security awareness, incident response, system testing procedures
Management / Key Persons	All topics; additional training on LOK obligations for licensee and Key Persons
Finance/Payment Team	AML, transaction monitoring, financial reporting to CGA

12.4 Training Records

Records of all completed training - including dates, attendees, and topics covered - are maintained by the Learning & Development / Compliance team and made available to the CGA on request. Training completion is tracked on a per-employee basis.



Declaration and Sign-Off

I, the undersigned, being a duly authorised representative and Key Person of Medium Rare N.V. (Stake.com), hereby declare that:

- This Operations Manual accurately reflects the way Stake.com operates its remote gaming business under its CGA Gaming License.
- All information, policies, procedures, and technical descriptions contained in this manual are true, accurate, and up to date as of the Effective Date stated on the cover page.
- Stake.com will update this manual whenever material changes occur and will submit amendment reports to the CGA as required by Article 5.10 of the LOK.
- Stake.com will make this manual available to the CGA for inspection within five (5) working days of any CGA request, as required by Article 5.9, paragraph 3 of the LOK.

Name	Véronique dos Reis
Title	Head of Compliance
Company	Medium Rare N.V.
Signature	
Date	09/06/2026