

		Location	Checked	Instructions	Comments
cs	Corporate Structure				
1.	Start up / New company	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao. Indicate the date of incorporation.</i>	21.9.2023
	Existing operating company holding sub license	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao. If you notice that the company is Tier 1 (known) company please make a note. Check if it is a start up or transferring from another jurisdiction</i>	na
	GoAML	BCIF Q10		<i>Check whether Q10 is affirmative. Check whether FIUC screen shot submitted.</i>	Yes. screen shot submitted
	Check if any person is already approved under other applications. If missing information check Business Plan and Q 12 BCIF		Y	<i>List Approved People with their QPAs. List</i>	CO: Yanica Grech UBO: Meri Kandelaki (on 3 other applications – see below) OR: Claire G. Olmtak

				Location	Checked	Instructions	Comments
						Ensure conformity ith BP organisational structure and individual PHDFs	CFO: Alena Sergueeva who sits as CFO on 9 applications, including Dama M.D: Elena Deyugina (Sole director of Hold Co)
jO	Updated company structure diagram showing equity and control percentages, signed by a company director of the applicant company.			BCI 10.1	Y	Check is signed by director and verified with stat docs submitted.	YES
CS.1.3	Shows Control Percentage				Y		Yes
CS.1.4	Equity Adds Up				Y		Yes
CS.2.1	Share ledger of the applicant company including companies holding 10% or more shareholding in the applicant company and all persons holding 10% or more shareholding in the applicant company. (Ultimate Beneficiary Owners) or trust deed.			BCI 10.2	Y	Make sure share ledger lists all involved parties . Request trust deed.	Yes
	Calculate all percentages equal to or more to ten percent.				Y		
	List all Companies in Share Ledger of the applicant company				Y		
	% share	Company Name.	Company Reg. No	Country	BCI 10.2	Y	List all companies having 10% or more shareholding here. If no companies are involved then delete this section.
	100	Myristica Holding Ltd	HE 461332	Cyprus		Y	Als, Certificate of Incumbency,

					Location	Checked	Instructions	Comments												
								Sole director: Elena Deryugina – submitted PHDF MYRISTICA HOLDING LTD / i-Cyprus — Cyprus Companies Search												
I	External Sources Verification	<table><tr><td>NorthData</td><td></td></tr><tr><td>ICIJ</td><td></td></tr><tr><td>Lexis Nexis</td><td></td></tr><tr><td>AMLRISK</td><td></td></tr><tr><td>LinkedIn</td><td></td></tr><tr><td>Address (Google Maps)</td><td></td></tr></table>			NorthData		ICIJ		Lexis Nexis		AMLRISK		LinkedIn		Address (Google Maps)				Using the external reference sources to verify company structure. Use country specific company registries to trace more information on the company.	
NorthData																				
ICIJ																				
Lexis Nexis																				
AMLRISK																				
LinkedIn																				
Address (Google Maps)																				
CS.2.3	List all persons in Share Ledger over 10% -				BCI 10.2	Y	There has to be at least one UBO. All UBOs of companies with controlling interest must be listed. This section is linked to BC.													
	Company Belonging to:	Full Name	Passport Number	Country of Issue																
	Myristica Holding Ltd	Meri Kandelaki	22AA28580	Georgia		Y		She is also the CEO There were 2 former UBOs transferring before current UBO. SPAs: SPA dated 21.10.2025 submitted , certified and signed between former UBO Lok T.G. Chung and the holding company Myristica for the amount of XCG 100. Arm's length is questionable.												

					Location	Checked	Instructions	Comments																
								(Require FS 2024) No SPA for former UBO transfer submitted. UBO is also on applications Topchik, Gareton, and BONUS Operations She submitted a PHDSF wherein she declared her total income and net worth to be Eur 400,000 acquired through income from dividends, and from rents or leases.																
	External Sources Verification	<table><tr><td>NorthData</td><td>X</td></tr><tr><td>ICIJ</td><td>X</td></tr><tr><td>PRADO</td><td></td></tr><tr><td>Lexis Nexis</td><td></td></tr><tr><td>AMLRISK</td><td>x</td></tr><tr><td>LinkedIn</td><td>-</td></tr><tr><td>Onfido</td><td></td></tr><tr><td>Address (Google Maps)</td><td></td></tr></table>	NorthData	X	ICIJ	X	PRADO		Lexis Nexis		AMLRISK	x	LinkedIn	-	Onfido		Address (Google Maps)						Using the external reference sources to verify company UBO are involved in other gaming companies or business. Also remark if we suspect that this is a shadow UBO.	
NorthData	X																							
ICIJ	X																							
PRADO																								
Lexis Nexis																								
AMLRISK	x																							
LinkedIn	-																							
Onfido																								
Address (Google Maps)																								
2.4	SOW declaration including supporting documents					Y	Insufficient documentation. Check	BCIF: Funding by shareholders in the																

		Location	Checked	Instructions	Comments
				<i>for SOW submitted in support of SOF and BP financial projections.</i>	amount of Eur 100,000 SOF is lacking. SOF submitted: declaration of original UBO FS 2025, recording a net profit of Eur 67,219 Missing: Original loan agreement, FS 2024, any funding arrangements with new UBO BP has financial projections. It was submitted in 2023 under original UBO. No updated BP submitted under subsequent, including current, UBO
	SOF		Y	<i>In the event of insufficient funding a ticket is sent for clarification.</i>	
	Verify objects of the company are for gaming	AI	Y		Yes
	Certificate of Good Standing (for tax purposes)		Y		Yes
	Ensure board management requirements are met		Y	<i>Check voting rights and appointment.</i>	Y. One or more directors

							Location	Checked	Instructions	Comments														
CS 3.4	Articles of .Incorporation of companies holding 10% or more shareholding in the applicant company:							Y																
	%	Company Name		Company Reg. No		Country	BCI 10.3	Y	Replicate 3.4. and 3.4. 1 for every company															
								Y																
CS 3.4.1	External Sources Verification		<table border="1"> <tr><td>NorthData</td><td></td></tr> <tr><td>ICIJ</td><td></td></tr> <tr><td>PRADO</td><td></td></tr> <tr><td>Lexis Nexis</td><td></td></tr> <tr><td>AMLRISK</td><td></td></tr> <tr><td>LinkedIn</td><td></td></tr> <tr><td>Address (Google Maps)</td><td></td></tr> </table>				NorthData		ICIJ		PRADO		Lexis Nexis		AMLRISK		LinkedIn		Address (Google Maps)				For each company verify links and registrations	
NorthData																								
ICIJ																								
PRADO																								
Lexis Nexis																								
AMLRISK																								
LinkedIn																								
Address (Google Maps)																								
CS.4.1	Directors list for the applicant company including companies holding 10% or more shareholding in the applicant company.						BCI 10.3																	
	Company	VP	ST	Full Name	Passport Number	Country of Issue	AI		Lis all Directors. Check VP if director has voting powers. ST if it has statutory powers. Check with CS 3.4 above															
								Y																
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CS.4.2	Managing Directors as Official Representatives			BCI 10.3			
	Trust Company	Full Name	Passport Number	AI		List all Managing Directors. At least one local director required..	
	IGA Trust B.V.		Co Reg 154605		Y		
	External Sources Verification	NorthData					Sole director Verified www2.curacao-chamber.com/excerpt.asp
		ICIJ					
		PRADO					
		Lexis Nexis					
		AMLRISK					
		LinkedIn					
		Address (Google Maps)					

This CST was drafted on the 10.8.2026, post licensing. For such purposes, lacking info was indicated, but no CLs were raised