

**Funds Management Policy
(Segregation of Player Funds)**

Universe B Games B.V.

1. Purpose

The purpose of this Funds Management Policy is to establish a comprehensive, transparent, and regulatorily compliant framework for the handling, safeguarding, and segregation of player funds by **Universe B Games B.V. (Company)**, operating on the web site www.betfury.io, Betfury.com, Betfury.cl

This policy aims to:

1.1. Ensure Protection of Player Balances

Guarantee that all funds deposited by players or otherwise attributable to players (such as winnings, pending withdrawals, unallocated bonuses, locked balances) remain **fully protected, available on demand**, and **never exposed to operational or financial risks** of the company.

1.2. Comply with Curaçao LOK Requirements

Demonstrate full adherence to the financial integrity obligations established under the Curaçao **Landsverordening op de Kansspelen (LOK)**, including transparent tracking, storage, and documentation of player fund flows, reconciliations, and segregated-account structures.

1.3. Maintain Clear Distinction Between Funds

Define and enforce strict segregation between:

- **Player Funds** (client liabilities)
- **Operational / Corporate Funds**
- **Reserve Funds** (if used for liquidity or processing)

Such segregation prevents misuse or misallocation of player money and ensures financial solvency in relation to customer liabilities.

1.4. Establish Internal Controls and Accountability

Identify responsibilities of Finance, Compliance, AML, and Executive Management regarding custodianship of funds, daily monitoring, reconciliation requirements, escalation rules, and breach response obligations.

1.5. Provide Audit-Ready Transparency to the CGA

Ensure that **all flows of player money are traceable, auditable, and accessible** for submission to the Curaçao Gaming Authority (CGA) at any time upon request — including historical snapshots, operational ledgers, and reconciliation reports.

1.6. Build Trust and Reduce Regulatory Risk

Improve business resilience by maintaining a structure that protects both players and the company, reducing exposure to insolvency risks, financial penalties, or suspension of operations.

2. Scope

This policy applies **company-wide** and governs every financial flow, process, system, and employee involved in the management of player funds for **Universe B Games B.V.**, including:

2.1. Covered Funds

The policy covers **all categories of player-related funds**, including:

- Deposited funds
- Winnings
- Pending withdrawals
- Locked / reserved balances (e.g., promotional wagering balance)
- Chargeback-related or dispute-held funds
- Crypto balances (if applicable) converted or held in custody
- Funds retained for AML or fraud review
- Dormant account balances

2.2. Covered Systems and Infrastructure

This policy applies to any system where player funds are:

- received
- stored
- converted
- processed
- reconciled
- reported

Including:

- Wallet modules
- Payment processor dashboards
- Crypto processing gateways
- Internal ledgers and accounting systems
- Segregated bank accounts
- Segregated PSP merchant accounts
- Automated reconciliation systems
- Internal reporting tools

2.3. Covered Business Processes

The policy governs:

- deposit processing
- withdrawal processing
- payment method verification
- daily, weekly, and monthly reconciliations
- fund movement approvals
- tracking of liabilities
- handling of chargebacks and disputes
- AML-related fund holds
- incident reporting
- internal and external audits

2.4. Covered Personnel

Mandatory compliance applies to all individuals with financial-system access, including:

- Finance team
- Compliance & AML officers
- Fraud & Risk team
- CTO & tech personnel with system-level access
- CEO / CFO / authorized signatories
- Any employee interacting with player funds directly or indirectly

2.5. Covered Jurisdictions and Regulatory Bodies

This policy applies to all operations under the Curaçao license and CGA oversight, including:

- players from permitted markets
- payment channels used to process funds

- cross-border financial flows connected to player operations

2.6. Exclusions

This policy **does not** cover:

- purely operational budgets
- corporate investment activities
- marketing budgets
- compensation or incentive payments to employees
- treasury or liquidity management unrelated to player liabilities

Such items are handled through separate corporate finance policies.

3. Definitions

“Player Funds” refers to **all monetary amounts that belong to players**, whether currently held, pending, or earmarked for future withdrawal. This includes, but is not limited to:

- **Deposits** made by players via any supported payment method.
- **Winnings** generated from gameplay activities.
- **Pending withdrawals** not yet processed or released.
- **Bonus funds converted to real money** after meeting wagering requirements.
- **Locked balances**, including funds temporarily held due to wagering requirements, AML review, fraud checks, or dispute resolution.
- **Crypto-denominated balances** (if applicable), whether stored as cryptocurrency or converted into fiat for operational purposes.
- **Refundable amounts**, including chargeback resolutions in favor of the player.

Player Funds represent **liabilities** of Universe B Games B.V. toward its customers and must remain available for withdrawal **at all times**.

“Operational Funds” refers to **all financial resources belonging to Universe B Games B.V.**, used to support business activities unrelated to player liabilities. These funds may include:

- revenues generated from gaming operations
- corporate treasury and liquidity reserves
- marketing budgets, operational budgets, payroll, and administrative funds
- investment capital and shareholder contributions
- PSP reserve balances explicitly earmarked as *operational reserves* (not tied to player activity)

Operational Funds **must not be commingled** with Player Funds under any circumstances, and **may not** be used to cover withdrawals, winnings, or deposit balances.

“Segregated Account” is a **dedicated bank account, PSP account, crypto wallet, or financial institution account** created **exclusively for the purpose of holding Player Funds**.

A valid Segregated Account must:

- be used **solely** for storing Player Funds;
- have **no operational expenditure flows** passing through it;
- reflect **real-time balances** corresponding to the total player liabilities maintained in the gaming system;
- be fully traceable and auditable by the **Curaçao Gaming Authority (CGA)**;
- be accessible only by authorized financial personnel under a controlled approval workflow;
- support daily, weekly, and monthly **funds reconciliation** procedures.

If crypto assets are used, Segregated Accounts may include:

- cold wallets
- multi-signature wallets
- custody accounts with licensed crypto custodians

provided these wallets are operated **exclusively** for holding Player Funds and meet security and auditability standards required by the CGA.

4. Regulatory Basis

Player funds are managed in accordance with Curaçao LOK requirements, CGA guidance, and internal financial controls. The company ensures immediate availability of player balances upon withdrawal request.

5. Segregation of Funds

Universe B Games B.V. maintains separate financial accounts for:

- Player funds (segregated account)
- Operational business funds
- Payment processing reserves (if applicable)

Player funds are never used for operational expenses, investments, or financial activities unrelated to fulfilling player withdrawal obligations.

6. Controls Over Player Funds

Company maintains a multilayer control framework designed to ensure the continuous protection, accuracy, and auditability of Player Funds. The following controls apply across all cashier systems, PSP channels, segregated accounts, and internal ledgers.

6.1. Daily Reconciliation of Player Balances

The Finance and Compliance teams perform end-of-day and intra-day reconciliations to ensure:

- the total real money balances shown in the platform database
- the total Player Funds stored in segregated accounts
- the PSP and crypto gateway balances
- the internal liability ledger

all match without discrepancies.

Daily reconciliation includes:

- automated extraction of liabilities
- cross-checking with bank/PSP/crypto balances
- identification of mismatches
- initiation of correction procedures
- escalation to CFO and CCO in case of deviations beyond tolerance thresholds

A reconciliation report is archived daily and retained for regulatory audit.

6.2. Automated Monitoring of Wallet and other funds totals

The gaming platform continuously monitors:

- real-time wallet balances
- changes in cumulative liabilities
- withdrawals pending approval
- deposit activity per PSP
- crypto wallet inflows/outflows
- suspicious fluctuations or imbalances

Alerts are automatically generated if:

- liabilities increase without corresponding inflows
- wallets exceed predefined thresholds
- PSP reserves fall below liquidity requirements

- anomalies indicate possible system errors or fraud

These alerts are reviewed by Finance, Fraud, and Compliance teams.

6.3. Multi-Person Approval for Fund Transfers

To protect Player Funds, the company enforces a **dual-control / four-eyes principle** for all financial movements involving segregated accounts.

This includes:

- withdrawal release approvals
- transfers between PSP accounts
- topping up or rebalancing segregated accounts
- replenishing crypto wallets
- moving operational funds

Required approvals:

1. **Finance Officer** – initiates or validates transaction
2. **CFO or Authorized Signatory** – final approval
3. **Compliance Officer** – additional approval required for high-risk or AML-flagged transactions

No single employee may transfer or authorize transfers of Player Funds independently.

6.4. Immutable Financial Audit Trails

All financial actions involving Player Funds are recorded as immutable, timestamped audit logs:

- deposits
- withdrawals
- reversals
- refunds
- PSP settlements
- crypto movements
- account adjustments
- fee deductions (if applicable)
- reconciliation corrections

Audit logs are:

- stored in a secure, non-editable environment

- accessible only to authorized personnel
- periodically exported for backup
- retained for a minimum of 5 years
- available for review by the CGA at any time

Tampering, deletion, or modification of records is strictly prohibited and technically prevented through database-level protections.

6.5. Segregated Account Integrity Controls

Additional safeguards ensure the integrity of accounts that store Player Funds:

- no operational expenses are permitted from segregated accounts
- automated rules prevent money from being routed to non-authorized destinations
- periodic access reviews ensure only approved personnel hold permissions
- system enforces withdrawal limits when liquidity drops below thresholds
- alerts notify management if segregated account balances drop below player liabilities

6.6. Periodic Internal and External Audits

- Monthly internal audits verify financial flows and reconciliations.
- Quarterly Compliance audits ensure LOK adherence.
- External financial auditors review segregation compliance annually or upon CGA request.

7. Withdrawal Processing

Universe B Games B.V. ensures that all withdrawals are processed safely, accurately, and in compliance with Curaçao regulatory requirements. Withdrawal procedures include automated verifications, manual reviews, fraud screening, and AML controls before funds are released from segregated accounts.

Withdrawals are processed only to verified payment methods. Funds are released from the segregated account following automated and manual fraud/AML checks.

8. Insolvency Protection

Company maintains a financial structure that ensures all Player Funds remain fully protected and ring-fenced in the event of financial distress, operational disruption, or insolvency proceedings. The purpose of these protections is to ensure that players retain priority access to their balances and are not exposed to corporate financial risk.

8.1. Ring-Fencing of Player Funds

Player Funds are held strictly in **segregated accounts** that:

- are legally and operationally separated from company operational accounts
- do not form part of the company's assets available to cover operational debts
- cannot be accessed by creditors or used as collateral
- are monitored and reconciled daily to ensure accuracy and completeness

This segregation ensures that Player Funds remain intact regardless of the company's financial condition.

8.2. Priority of Claims

In an insolvency scenario:

- Player Funds are treated as **client liabilities** rather than company assets
- Players hold **first-priority claims** to the balances held in segregated accounts
- Funds are returned to players before any payments are made to:
 - corporate creditors
 - service providers
 - financial institutions
 - shareholders or related parties

This structure ensures compliance with Curaçao LOK, which mandates **priority payout to players** before any other liabilities.

8.3. Availability of Records for Liquidators

Company maintains:

- real-time liability ledgers
- payment processor statements
- player balance logs
- transaction histories
- reconciliation files
- PSP and crypto settlement reports

All records are:

- stored in immutable form
- updated daily
- accessible for regulatory review or insolvency administrators
- retained for minimum 5 years

These records enable liquidators to identify, verify, and return Player Funds with accuracy.

8.4. Liquidity and Solvency Safeguards

To prevent insolvency-related risks, the company maintains:

- sufficient liquidity in segregated accounts to cover 100% of Player Funds
- PSP reserves meeting financial stability requirements
- crypto liquidity (if applicable) with multi-signature protection
- internal early-warning indicators (e.g., liquidity drop, reconciliation mismatch)
- executive-level escalation and reporting
- monthly solvency reviews conducted by Finance and Compliance

Any mismatch between liabilities and segregated account balances triggers:

- immediate investigation
- temporary pause on withdrawals
- escalation to CFO, CEO, and CCO
- corrective actions
- reporting to CGA if the mismatch is material

8.5. Contingency & Wind-Down Plan

In the event of imminent insolvency or business shutdown:

1. The company initiates Operational Wind-Down Protocol.
2. Withdrawals are prioritized for all players with positive balances.
3. Communication is issued to players explaining the process.
4. Segregated account balances are used exclusively for returning funds to players.
5. Financial statements are submitted to CGA.
6. All remaining player liabilities are discharged before addressing any corporate obligations.

This ensures the orderly and fair settlement of all player balances.

8.6. CGA Oversight

The Curaçao Gaming Authority reserves the right to:

- inspect the segregated accounts
- review reconciliation reports
- request solvency statements
- impose corrective actions
- intervene in the event of financial instability

Company provides full cooperation and transparency to CGA in any insolvency-related investigation or enforcement process.

9. Reporting & Transparency

Company maintains a transparent financial reporting framework that ensures continuous oversight of Player Funds, accurate monitoring of liabilities, and immediate escalation of discrepancies. This framework enables timely regulatory reporting and full audit readiness under the Curaçao LOK regime.

9.1. Monthly Internal Financial Reports

Finance prepares monthly detailed financial reports containing:

- **Total Player Funds** held across all segregated bank accounts, PSP accounts, and crypto wallets.
- **Total Player Liabilities** based on the gaming platform's ledger and database.
- **Variance Analysis Report**, comparing liabilities vs. available segregated balances.
- **Liquidity Position**, including PSP reserves and crypto liquidity (if applicable).
- **Reconciliation Logs**, including any correction entries or adjustments.
- **Risk Notes**, highlighting anomalies or potential financial exposure.

These reports are reviewed and signed off by:

- CFO
- CCO
- Finance Manager
- Compliance Manager

The approved report is stored in a secure repository for regulatory audit.

9.2. Daily and Weekly Transparency Controls

Although the full report is monthly, the company performs regular monitoring:

Daily

- Player balance extraction & comparison
- PSP settlement checks
- Crypto wallet balance verification
- Reconciliation mismatch alerts
- System alert review (fraud, AML, operational)

Weekly

- Aggregated reconciliation reports for internal review
- Cash flow analysis
- Summary of fraud/AML escalations affecting funds
- Snapshot of segregated account balances

These controls ensure month-end reporting accuracy.

9.3. Discrepancy Management Procedure

Any inconsistency discovered between:

- segregated account totals
- PSP balances
- crypto balances
- platform liabilities
- transaction logs

must be investigated **immediately**.

Investigation workflow:

1. **Automatic flag** generated by reconciliation system.
2. Finance performs initial review and identifies potential source.
3. Fraud, Tech, or PSP support may be engaged if needed.
4. CFO and CCO receive high-priority notification.
5. Withdrawals may be temporarily paused if mismatch exceeds materiality threshold.
6. Root cause analysis conducted and documented.
7. Corrective action implemented and verified.
8. Incident logged in immutable reporting system.

If discrepancy is **material or recurring**, CGA is notified.

9.4. Transparency to Regulators

Company may provide upon the separate request of the Curaçao Gaming Authority with:

- financial statements upon request
- segregated account balance confirmations
- reconciliation records
- PSP settlement reports
- crypto custody statements (if applicable)
- audit logs related to fund movements
- internal discrepancy reports
- liquidity assessments

All required information must be:

- accurate
- complete
- available within defined regulatory timelines
- provided in an auditable, standardised format

9.5. Record Retention

All reports, reconciliations, ledgers, and financial logs related to Player Funds are retained for **minimum 5 years**, including:

- monthly financial reports
- reconciliation files
- audit trails
- PSP statements
- crypto transaction logs
- CGA submissions
- discrepancy investigations

These are stored in secure, immutable storage systems.

9.6. Executive Oversight

Senior management receives:

- monthly financial performance briefing
- solvency and liquidity updates
- risk assessment summary

- compliance report on Player Funds management

This ensures board-level oversight and strategic risk mitigation.

10. Governance & Responsibilities

The CFO oversees fund segregation, with audits performed by Compliance. CTO ensures secure real-time tracking of balances within the platform. CEO receives monthly reports.

11. Breach & Incident Handling

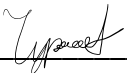
Any breach of segregation rules is treated as a critical incident and follows the Incident Response Playbook. CGA is notified when required, and corrective measures implemented immediately.

12. Review & Updates

This policy is reviewed annually or following regulatory changes, financial audits, or platform infrastructure updates.

Date 10 November 2025

Approved by the Director

 Jevgenijs Curikovs