

OPERATIONS AND COMPLIANCE MANUAL

BetFury / Universe B Games B.V.

Prepared in accordance with Article 5.9 of the Landsverordening op de Kansspelen (LOK)

For submission to the Curaçao Gaming Authority

Document Control Item	Details
License Holder	Universe B Games B.V.
Brand	BetFury
Company Number	155126
Registered Office	Seru Loraweg 17-C, Janwe, Willemstad, Curaçao
License Type	B2C Provisional License for Remote Games of Chance
License Number	OGL/2024/1494/0942
Licensing Authority	Curaçao Gaming Authority (CGA)
Current License Period	Current extension valid until 31 July 2026, unless suspended, revoked, amended or otherwise affected by applicable law or CGA decision
Approved Domains	betfury.io; betfury.com; betfury.cl
Document Version	1.0 - Regulator Submission Draft
Date	15 June 2026
Approved By	Director, Jevgenijs Curikovs

Drafting note: This Manual describes the Company's operational framework and control approach. It is not intended to expand the scope of the license or create obligations beyond applicable law, license conditions or CGA requirements. Where a legal or regulatory requirement is mandatory, the Company will comply with that requirement in accordance with applicable rules and CGA instructions.



(SMES) Solutions for Management and Employment Support N.V.

Managing Director

29.06.2026

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1. Purpose and Regulatory Status

This Operations Manual has been prepared by Universe B Games B.V., operating under the registered brand name BetFury, to document the operational, technical, compliance, player protection, reporting, data management and governance arrangements applicable to its licensed remote games of chance operations.

The Manual is prepared in accordance with Article 5.9 of the Landsverordening op de Kansspelen (LOK) and is intended to demonstrate the manner in which the Company organizes, implements, monitors and evidences compliance with the LOK, the conditions of Curaçao Gaming Authority license number OGL/2024/1494/0942, and all applicable CGA policies, procedures, rules, guidelines and instructions.

Universe B Games B.V. holds a B2C provisional license for remote games of chance. The original provisional license became effective on 31 July 2025 for an initial period of six months and has been extended for an additional six-month period, with the current extension valid until 31 July 2026, unless suspended, revoked, amended or otherwise affected by applicable law, regulation, policy, procedure, guideline, instruction or CGA decision.

This Manual is a controlled and living document. It will be reviewed at least annually and whenever there is a material operational, technical, legal, regulatory, supplier, platform, product, payment, domain, data, player protection, reporting or governance change.

2. License Holder and Brand Overview

2.1 License Holder

The license holder is Universe B Games B.V., a company incorporated under the laws of Curaçao with company registration number 155126 and registered office at Seru Loraweg 17-C, Janwe, Willemstad, Curaçao.

2.2 Brand

BetFury is a registered brand name of Universe B Games B.V. For the purposes of this Manual, references to "BetFury", "the Brand", "the Operator", "the License Holder", "the Company", "we", "us" or "our" will mean Universe B Games B.V., acting through the BetFury brand, unless the context requires otherwise.

2.3 Licensed Activity

The Company operates BetFury as a B2C online gaming and betting platform offering remote games of chance to eligible players in permitted jurisdictions, subject to applicable laws, regulatory restrictions, internal compliance controls, player verification requirements, responsible gaming measures and the Terms and Conditions applicable to the BetFury platform.

3. Regulatory Basis

This Manual is prepared with reference to the following framework:

1. Landsverordening op de Kansspelen, P.B. 2024, no. 157, as amended from time to time;
2. Article 5.9 of the LOK;
3. Curaçao Gaming Authority license number OGL/2024/1494/0942;
4. License conditions attached to the B2C provisional license for remote games of chance;
5. Applicable Curaçao laws and regulations, including rules relating to AML/CFT/CPF, identification and verification, sanctions, responsible gaming, advertising, consumer protection, privacy and information security;
6. The Landsverordening melding ongebruikelijke transacties (LMOT), the Landsverordening identificatie bij dienstverlening (LID), and the Sanctielandsverordening (SNO), as applicable;
7. CGA policies, procedures, rules, guidelines, instructions, portal checklist requirements and reporting requirements issued from time to time;
8. Applicable laws and regulations in jurisdictions where BetFury services are made available;
9. The Company's internal policies, procedures and control framework.

In the event of any conflict between this Manual and applicable law, regulation, license condition or CGA instruction, the applicable law, regulation, license condition or CGA instruction will prevail.

4. Compliance Approach and Commitment

Universe B Games B.V. is committed to conducting its licensed gaming operations in a lawful, responsible, transparent, verifiable and reliable manner, with controls designed to support ongoing compliance and constructive regulatory engagement.

The Company conducts the BetFury operation within the scope of its Curaçao Gaming Authority license and in accordance with applicable laws, regulations, license conditions, regulatory policies, procedures, guidelines, instructions and approvals.

The Company maintains product, jurisdictional, player eligibility and compliance review controls designed to prevent the offering of gaming activity where it is not permitted by applicable law, license conditions, CGA requirements or internal policy.

4.1 Regulatory Integrity and Transparent Operations

The Company designs and operates its business, platform, payment flows, player account arrangements, supplier relationships, marketing activity, product presentation and technical infrastructure in a manner intended to support transparency, auditability and compliance with applicable legal, regulatory and licensing requirements.

4.2 Regulatory Cooperation

The Company intends to cooperate with the Curaçao Gaming Authority in a timely, transparent and constructive manner. The Company will make this Manual, supporting annexes, policies, procedures, reports, explanations and relevant records available to the CGA upon lawful request and within the timeframe required by applicable law, license conditions or CGA instruction.

4.3 Legal Change Monitoring

The Company monitors legal and regulatory developments affecting the licensed operation. Where a change in law, license condition, CGA instruction or market restriction affects BetFury operations, the Company will assess the impact and take appropriate measures, which may include updating this Manual, updating internal procedures, adjusting jurisdictional or product availability, notifying or seeking approval from the CGA where required, and training relevant personnel.

5. Article 5.9 LOK Mapping

Required Area	Manual Reference
Description of games of chance offered	Sections 11 and 12
Payment methods, stakes, prizes and payout process	Sections 18, 19 and 20
Software and outcome-determining elements	Sections 13 and 14
Methods for monitoring and testing quality	Section 14
Player data storage	Sections 26 and 27
Visual representation of player interface elements	Sections 10 and 24;
Controls for ineligible, excluded or banned persons	Sections 15 and 16
Technical infrastructure and disaster recovery	Sections 28, 29 and 30
Responsible gaming implementation	Section 22
General terms and conditions	Section 23
Dispute resolution	Section 25
Digital records relating to players and transactions	Sections 26 and 27
Training and permanent education	Section 36
Regulatory reporting and change management	Sections 32, 33 and 34
Compliance evidence	Section 35

6. License Conditions Mapping

The following table maps the license conditions and key CGA requirements identified in the current license documentation to this Manual.

License / CGA Requirement	Manual Reference
B2C provisional remote gaming license status and license period	Sections 1 and 2
Approved domains and subdomains	Section 10;
Product scope and lawful product assessment	Section 9

Prior CGA approval or consent for material changes	Section 32
Compliance with LOK, LMOT, LID, SNO and applicable laws of offered jurisdictions	Sections 3 and 4
Outsourcing controls and responsibility for suppliers	Section 31
Safe and secure player environment	Sections 17, 28 and 30
Player registration before participation	Sections 15 and 17
All transactions through player accounts	Sections 17 and 18
Separate account / safeguarding for player deposits and prize money	Section 19
Fiat and virtual currency controls	Section 18
Game certification and CGA-approved test laboratories	Sections 13 and 14
General terms and conditions content	Section 23
Publicly accessible information and CGA seal	Section 24
Reports and CGA access to data	Sections 27, 29 and 33
Mandatory policies and procedures	Sections 21, 22, 30, 31, 35 and 38
Consequences of non-compliance	Section 34 and Section 37

7. Governance and Responsibilities

7.1 Senior Management

The board and senior management of Universe B Games B.V. have overall responsibility for the BetFury control framework and for supporting safe, responsible, transparent, verifiable and reliable operations. Senior management approves this Manual, allocates resources, appoints responsible persons, oversees critical suppliers, and supports compliance with the LOK, license conditions and CGA instructions.

7.2 Compliance Function

The compliance function is responsible for maintaining this Manual, monitoring regulatory developments, reviewing operational changes, coordinating CGA reports and submissions, reviewing incidents and complaints, maintaining compliance evidence, and supporting inspections or information requests from the CGA.

7.3 AML/CFT/CPF Function

The AML/CFT/CPF function is responsible for customer due diligence, enhanced due diligence, sanctions screening, PEP screening, transaction monitoring, suspicious activity escalation, AML records and AML training. Suspicious transactions and high-risk activities are reviewed and escalated in accordance with applicable law and internal policy.

7.4 Responsible Gaming Function

The responsible gaming function is responsible for the responsible gaming policy, player protection tools, self-exclusion, limits, player interaction procedures, responsible advertising controls, and related staff training.

7.5 Information Security Function

The information security function is responsible for access control, cybersecurity monitoring, vulnerability management, security testing, incident response, data protection and business continuity support.

8. Local Presence and CGA Checklist Obligations

The Company monitors and addresses applicable CGA online gaming portal checklist requirements within the deadlines set by the CGA. The Company maintains evidence relating to local presence and operational requirements in the Compliance Evidence Register.

These requirements may include, as applicable:

- Management by at least one natural person resident in Curaçao, or by a legal entity incorporated under Curaçao law and managed by at least one natural person resident in Curaçao;
- No outstanding tax or social security debts, unless subject to an approved payment arrangement;

- Key persons involved in operations not being considered vulnerable persons;
- Registration in the goAML reporting system;
- Permanent and full-time employment or equivalent engagement of at least one key person, other than the managing director, who is registered in the Curaçao Population Register;
- Access to immovable property or business premises in Curaçao equipped with standard facilities suitable for licensed gaming operations.

9. Scope of Licensed Operation and Product Review

Universe B Games B.V. offers remote games of chance, betting products and related player account services within the scope of its license and applicable legal, license and CGA requirements.

The Company applies product review controls so that any product, service, financial feature, exchange-related functionality, investment-like feature or non-gaming service referenced in BetFury materials is assessed for legal, regulatory, licensing, AML/CFT/CPF, consumer protection and operational implications and is either within the scope of the licensed operation or clearly treated outside that scope, as applicable.

Where BetFury documentation, platform pages or related brand materials refer to products or services such as crypto swap, crypto futures, crypto loans, staking, digital assets, tokens, loot boxes, battles, tournaments or other non-standard products, the Company assesses and documents, where applicable, whether each product:

- Falls within the scope of the licensed gaming operation;
- Is offered by Universe B Games B.V. or another legal entity;
- Requires CGA notification, approval or disclosure;
- Requires separate legal, regulatory, AML/CFT/CPF, consumer protection or financial services assessment;
- Is clearly and accurately presented to players.

10. Approved Domains and Player Interfaces

The licensed operation is conducted through the domains, subdomains, websites and/or applications approved by the CGA and recorded in the CGA online gaming portal.

Domain	Status	Notes
betfury.io	Approved domain	Player-facing BetFury domain
betfury.com	Approved domain	Player-facing BetFury domain
betfury.cl	Approved domain	Player-facing BetFury domain

No new domain or subdomain may be added, removed, transferred, materially changed or used for licensed operations unless reviewed internally and, where required, approved by or notified to the CGA.

11. Games of Chance Offered

BetFury offers online games of chance through approved player-facing domains. The game offering may include online casino games, slot games, live casino games, table games, crash or instant games, RNG-based games, sportsbook products, tournaments, promotional game formats and other products assessed as permitted under the license and applicable law.

Games are made available in accordance with applicable law, the license, Terms and Conditions, provider rules, CGA requirements and internal controls.

12. Sportsbook and Event Betting Controls

Where BetFury offers sportsbook or event betting, the Company will ensure that sportsbook products are operated under documented rules addressing event selection, market creation, odds, settlement, event postponement, cancellation, voiding, recalculation, provider feeds, limits, maximum wins, error correction and fraud controls.

Sports betting rules will be made available to players and will be aligned with the general Terms and Conditions and the operational controls documented in this Manual.

13. Software, RNG and Game Integrity

The BetFury operation relies on application software, player account systems, game provider integrations, sportsbook systems, payment integrations, KYC/AML systems, fraud monitoring tools, reporting tools, hosting services, databases, logs, backups and related infrastructure.

The Company will maintain an up-to-date inventory of all gaming equipment, player interfaces, application software, platform software, game integrations and critical operational systems. The inventory will be provided to the CGA upon request.

Where game outcomes are determined by random number generation or other outcome-determining logic, such systems will be certified, tested and monitored in accordance with applicable regulatory requirements and internationally recognized standards.

14. Testing, Certification and Quality Monitoring

All remote games of chance offered by the Company will be certified for reliability and integrity by a testing laboratory approved by the CGA where certification is required. Games supplied by third-party providers will also be appropriately certified.

Testing and monitoring may include RNG certification, game integrity testing, platform security testing, vulnerability assessments, penetration testing, payment testing, user acceptance testing, change testing before release, post-release monitoring, defect tracking and incident investigation.

15. Player Registration, KYC and Access Restrictions

Players are required to register for a player account and log in before participating in licensed remote games of chance. Player registration is subject to controls designed to collect necessary information, detect duplicate or fraudulent accounts, identify ineligible persons, and support player eligibility review.

The Company may require a player to pass verification checks, including provision of identity documents, address information, source of funds, source of wealth, location information, payment method ownership evidence and other information necessary for regulatory or risk purposes.

The Company will maintain procedures for age verification, identity verification, duplicate account detection, risk assessment, sanctions screening, account suspension, account closure and jurisdictional restrictions.

16. Eligibility, Restricted Jurisdictions and Access Controls

The Company maintains access and eligibility controls designed to restrict participation by minors, self-excluded players, players from restricted jurisdictions, sanctioned persons, persons who cannot be verified where verification is required, players whose accounts are suspended or closed, and any other person who is not eligible to participate under applicable law, regulation, license condition, CGA instruction or internal policy.

The current list of restricted jurisdictions is maintained and aligned with the player-facing Terms and Conditions. The Company maintains reasonable technical, payment, registration, KYC, IP, device, location and manual review controls to detect and restrict access from restricted jurisdictions.

The Company applies jurisdictional controls designed to avoid offering services in jurisdictions where the offering is not permitted by applicable law, license condition, CGA instruction or internal policy.

17. Player Accounts and Account Information

All gaming and payment activity is linked to a registered player account. Each player account is linked to an identifiable player, subject to the verification and due diligence requirements applicable to the player and activity.

The Company will make necessary player account information available to the player, including current account balance, opening balance at the most recent login, total deposited amount since the most recent login, total wins and losses since the most recent login, transaction overview for at least the most recent 90 days, information on when prize money will be available, and the minimum period during which prize money remains available to the player, where required.

Player account history displayed to the player may differ from the back-office regulatory retention period. Any player-facing statement that betting history is displayed for a limited period will not limit the Company's obligation to retain regulatory, financial, AML, complaint, responsible gaming, system and transaction records for the period required by law, license conditions, CGA instructions and internal policy.

18. Payment Transactions, Fiat and Virtual Currency Controls

All payment transactions between the Company and players will be conducted through the player account. Deposits, withdrawals, prizes, account adjustments, bonuses and payment reversals will be recorded in a complete, accurate, secure and retrievable manner.

The Company may accept fiat currencies and virtual currencies only where permitted by applicable law, internal policy, payment provider rules and license conditions. Fiat currencies accepted as stakes or bets is required to be tradable on international markets. Virtual currencies accepted as stakes or bets is required to be tradable on internationally recognized virtual currency exchanges.

The Company will not operate as a fiat currency exchange service or virtual currency exchange service through the licensed gaming operation unless legally permitted to do so. The Company will not offer investment alternatives to players through the licensed gaming operation. This restriction does not prevent the use of in-game tokens or credits where permitted and properly controlled.

Prize money will be paid in the same fiat or virtual currency used to participate in the game unless otherwise permitted by applicable rules, disclosed to the player and controlled under internal procedures.

19. Player Funds and Prize Money Safeguards

The Company will maintain procedures designed to ensure that player balances and amounts owed to players are identifiable, traceable and protected through appropriate financial and operational controls.

The Company will maintain a separate account or equivalent safeguarding arrangement for player deposits and prize money, with appropriate reconciliation, access control, segregation and management oversight. The Company will maintain sufficient means to pay prizes and other player funds when due, subject to lawful restrictions, AML/CFT/CPF controls, sanctions controls, fraud controls, Terms and Conditions and regulatory obligations.

20. Withdrawals, Payouts and Reversed Transactions

Withdrawal requests are processed subject to player account verification, AML/CFT/CPF review, fraud and risk checks, responsible gaming review where applicable, payment provider rules, applicable Terms and Conditions, sanctions requirements and any legal or regulatory restriction.

The Company will maintain procedures for handling failed, reversed, disputed, suspicious or erroneous transactions. Such procedures may include transaction review, player contact, payment provider review, fraud review, AML/CFT/CPF escalation, account restriction or suspension, correction of player balances, complaint handling and regulatory reporting where applicable.

Withdrawals will not be processed to third-party wallets, cards or accounts where prohibited by internal policy, AML/CFT/CPF controls, payment provider rules or applicable law.

21. AML/CFT/CPF, Sanctions and Anti-Fraud Controls

The Company will maintain AML/CFT/CPF, sanctions and anti-fraud controls designed to prevent the use of BetFury for money laundering, terrorist financing, proliferation financing, sanctions evasion, fraud, cheating, collusion, service abuse or other criminal activity.

The AML/CFT/CPF framework may include customer risk assessment, customer due diligence, enhanced due diligence, transaction monitoring, source of funds or source of wealth review, sanctions screening, PEP screening, suspicious activity escalation, record keeping, staff training and periodic review.

The Company may suspend, restrict, freeze, close or terminate accounts, deposits, withdrawals or gaming activity where required by law, competent authority instruction, suspicious activity, sanctions concern, fraud concern, KYC failure, AML/CFT/CPF concern or Terms and Conditions breach.

Suspicious transactions will be investigated and, where required, reported to the relevant authority. Tipping-off restrictions will be observed where applicable.

22. Responsible Gaming and Player Protection

BetFury will implement responsible gaming measures designed to promote safe gambling and protect players from gambling-related harm.

Responsible gaming controls may include deposit limits, loss limits, wagering limits, session limits, time alerts, cooling-off periods, self-exclusion, responsible gaming information, support resources, monitoring of potentially harmful gambling behavior, restrictions on marketing to self-excluded players and staff training.

The Company will maintain procedures for self-exclusion. Where a player self-excludes, the Company will take steps to restrict the player's access to gaming activity and marketing communications in accordance with applicable law, Terms and Conditions and internal policy.

Responsible gaming information will be made available through the publicly accessible player interface, including information on gambling addiction, available help, ways to limit participation, and ways to self-exclude from participation, registration and marketing.

23. General Terms and Conditions

BetFury will make its Terms and Conditions available to players through the player-facing platform. The Terms and Conditions will be written in clear, understandable language and will be available in English and, where required, in the language of a jurisdiction where games are offered.

The Terms and Conditions will address at least changes to the terms, license holder name, business address and company registration number, player account opening obligations, closure or suspension of accounts, protection, cancellation or voiding of player funds and winnings, currencies used for stakes and prize money, communication relating to game participation, responsible gaming measures including deposit limits and self-exclusion, payment requests and inactive accounts, applicable Curaçao law and Curaçao court jurisdiction, complaints and ADR, and all applicable rules, policies, procedures and guidelines relevant to the subject matter.

The Company will ensure that player-facing Terms and Conditions are aligned with this Manual, current license details, CGA supervisory status, approved domains, complaint routes, ADR arrangements and regulatory recordkeeping obligations. Any outdated reference to a prior licensing body will be reviewed and corrected before regulatory submission or public reliance.

24. Publicly Accessible Information and CGA Seal

The Company maintains accurate and up-to-date information on the publicly accessible section of the BetFury gaming interface. Such information includes, where applicable, the name and trade name of the license holder, company registration number, license date and duration, geographic address and contact details, statement that the CGA is the supervisory authority, link to the Terms and Conditions, information on age and eligibility restrictions, game rules, payout percentages where applicable, participation costs, technology costs where applicable, gambling addiction information and help resources, complaints and dispute resolution procedure, prize payout timeframe, currency used for payout, player limit and self-exclusion options, and other responsible gaming information.

The Company will display the digital seal of the Curaçao Gaming Authority in accordance with applicable CGA requirements.

Players will be notified of material changes to public information in a timely and appropriate manner, including at login where required.

25. Complaints and ADR

The Company will maintain a clear complaints handling procedure for receiving, registering, investigating, responding to, escalating and resolving player complaints.

Complaint records will include the player account reference, complaint date, issue category, transaction or game reference where applicable, investigation steps, responsible department, response date, outcome, escalation status, ADR status and remedial action.

Where a complaint cannot be resolved through the internal complaints procedure, the player will be provided with access to the approved Alternative Dispute Resolution provider where required. The Company will ensure that player-facing complaints information, Terms and Conditions, this Manual and CGA portal information are aligned and consistently identify the correct licensing authority, complaint route and ADR provider.

26. Player Data, Privacy and Record Storage

The Company collects and processes player data for account registration, identity verification, gaming participation, payment processing, fraud prevention, AML/CFT/CPF compliance, sanctions compliance, responsible gaming, customer support, complaint handling, regulatory reporting and legal compliance.

Player data may include registration data, contact details, identity verification data, address information, account activity, login and device data, IP and location data, gaming transactions, financial transactions, payment method data, responsible gaming data, complaint and support records, risk alerts, fraud alerts, AML records and sanctions records.

The Company will maintain appropriate technical and organizational measures to protect player data against unauthorized access, disclosure, alteration, loss or destruction.

27. Digital Records and CGA Access

The Company will maintain complete, accurate, secure and retrievable digital records relating to players, player accounts, gaming transactions, financial transactions, complaints, incidents, responsible gaming interactions, AML/CFT/CPF reviews, supplier arrangements, reports and system changes.

Records will include player account details, registration and verification records, login and access records, deposits, withdrawals, bets, stakes, game rounds, winnings, payouts, bonus transactions, account adjustments, complaints, responsible gaming interactions, account suspensions and closures, AML alerts, fraud alerts, risk alerts, regulatory reports and audit trails.

The Company will ensure that records are available to the CGA in accordance with applicable law, license conditions and CGA instructions. Record retention will be determined by regulatory, legal, financial, AML/CFT/CPF, complaint, responsible gaming, data protection and operational requirements, and will not be limited by player-facing display periods.

28. Technical Infrastructure and Business Continuity

The Company will maintain technical infrastructure designed to support secure, reliable, auditable and continuous operation of the BetFury platform.

The Company will maintain a disaster recovery and business continuity plan designed to restore critical operations in the event of technical emergency, cyber incident, infrastructure failure, data loss, supplier failure or other material disruption. The plan will identify critical systems, recovery objectives, backup and restoration procedures, roles and responsibilities, communication steps, testing arrangements and review procedures.

29. Local Server / Tier-IV Data Centre Access

The Company will maintain or implement, in accordance with CGA requirements, arrangements ensuring that essential information about players, player transactions and financial transactions remains accessible to the CGA via a server or access environment hosted in a Tier-IV certified data centre in Curaçao, where required by applicable license conditions or further CGA instructions.

30. Information Security

The Company will maintain an information security framework designed to protect the confidentiality, integrity and availability of systems, data and operational records.

The information security framework may include access controls, authentication controls, encryption, network security, endpoint security, vulnerability management, penetration testing, logging, monitoring, incident response, backups, supplier security controls and security awareness training.

Gaming equipment and application software will comply with appropriate international standards and will be tested for information security and integrity by an independent qualified authority approved by the CGA, where required.

31. Supplier and Outsourcing Management

The Company may rely on third-party suppliers for platform technology, game content, sportsbook services, payment processing, KYC/AML tools, hosting, security, analytics, customer support, marketing support or other operational services. The Company remains responsible for the licensed operation.

Critical suppliers will be subject to due diligence, contractual controls, performance monitoring, data protection requirements, information security standards, regulatory access rights, incident notification requirements, business continuity arrangements and termination arrangements.

Where required by license conditions, policy, procedure, regulation or CGA instruction, the Company will obtain prior CGA approval before entering into a relationship with a supplier involved in the development, operation or maintenance of gaming platforms, provision of games or game content, or handling of payment traffic or financial transactions.

32. Material Changes and CGA Consent Where Required

The Company reviews material changes to determine whether CGA consent, approval or notification is required before implementation. Where prior CGA consent is required by applicable law, license condition or CGA instruction, the Company will seek such consent before implementing the change.

Material changes may include:

- Adding, removing or changing ultimate beneficial owners, holders of qualifying interests, directors, key persons or other relevant persons;
- Adding new domains or removing or changing existing domains;
- Adding new games or changing existing games;
- Entering into a relationship with a supplier involved in the development, operation or maintenance of gaming platforms;
- Entering into a relationship with a supplier involved in the provision of games or game content;
- Entering into a relationship with a supplier involved in payment processing or financial transactions;
- Amending the articles of association or corporate constitutional documents;
- Any other change, adjustment or addition designated by the CGA.

Such changes are subject to internal compliance review, risk assessment, documentation and approval before submission or notification to the CGA, where required.

33. Regulatory Reporting

The Company will submit reports and information to the CGA as required for supervision of compliance with the LOK and license conditions.

Reports may include:

- Change reports;
- Incident reports;
- Player transaction reports;
- Complaint reports;
- ADR reports;
- Independent expert reports assessing compliance with LMOT and LID requirements;
- Independent expert reports assessing information systems and responsible gaming controls;
- Any other report, confirmation, explanation or information requested by the CGA.

The Company will maintain a regulatory reporting calendar and evidence of submissions, confirmations, follow-up requests and responses in the Compliance Evidence Register.

34. Incident Management

The Company maintains procedures for identifying, assessing, escalating, remediating and reporting incidents. Incidents may include technical failures, cyber incidents, data breaches, game integrity issues, payment failures, AML/CFT/CPF concerns, responsible gaming issues, complaints involving material risk, supplier failures, service outages, record integrity issues or any other event that may materially affect players, compliance, records, system integrity or the licensed operation.

Where required, incidents are reported to the CGA within 24 hours or within any other timeframe required by applicable law, license conditions or CGA instruction. Where preliminary investigation is required to determine whether an event qualifies as an incident, the Company applies the timing rules required by the applicable license conditions and CGA instructions.

Incident records will include incident description, date and time, affected systems or players, preliminary assessment, escalation steps, investigation findings, remediation actions, player impact, regulatory assessment, CGA notification status and closure evidence.

35. Compliance Evidence Register

The Company maintains a Compliance Evidence Register for the BetFury operation. The purpose of the register is to provide organized evidence, upon request, showing how applicable legal, regulatory and license requirements are implemented, monitored and evidenced in practice.

The register may include current and previous versions of this Manual, Terms and Conditions, approved domains, game and supplier inventory, testing certificates, payment provider records, KYC/AML procedures, responsible gaming logs, information security evidence, disaster recovery documentation, complaint and ADR records, incident reports, change reports, training records, compliance reviews, audit reports, CGA submissions and CGA correspondence.

36. Training and Permanent Education

The Company provides relevant personnel with appropriate initial and ongoing training. Training is role-based and is provided at least annually or more frequently where required due to role, risk, regulatory change, operational change or identified training need.

Training may cover the LOK and CGA regulatory obligations, AML/CFT/CPF, sanctions compliance, customer identification and verification, responsible gaming, anti-bribery and anti-corruption, crime prevention, information security, data protection, complaint handling, communication with players, responsible advertising, incident reporting and internal escalation procedures.

Training records will include training date, topic, participants, trainer, materials, assessment or certification where applicable, and evidence of completion.

37. Manual Review and Version Control

This Manual will be reviewed at least annually and whenever required due to a material change in the BetFury operation or applicable regulatory requirements. The compliance function will maintain the current approved version and an archive of previous versions.

Update triggers include changes in law, regulation, CGA guidance, CGA policy, license conditions, domains, platform, technical infrastructure, games, game providers, payment methods, KYC/AML controls, responsible gaming controls, supplier arrangements, local server arrangements, data storage, Terms and Conditions, complaint procedures, incident findings, audit findings or management decision.

Where a compliance issue, control deficiency or implementation gap is identified, the Company reviews the matter, documents the assessment and takes proportionate corrective action. Applicable law and license conditions may provide for regulatory measures in case of material non-compliance, and the Company seeks to address any identified issue in a timely and constructive manner.

38. Annexes

The following annexes form part of or support this Manual. The Company should complete and attach the relevant annexes before final submission to the CGA.

Annex	Title	Status / Notes
Annex 1	CGA License Letter, Certificate and Current License Conditions	Attach uploaded CGA license package

39. Approval

This Operations Manual has been reviewed and approved for and on behalf of Universe B Games B.V.

Approval Item	Details
Name	Jevgenijs Curikovs
Position	Director
Signature	<i>Jevgenijs Curikovs</i>
Date	15 June 2026