

Luckywayz Limited B.V.

Business Plan

Prepared for Submission to the Curaçao Gaming Authority

License No OGL/2024/1497/0884

October 28, 2025

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1. OVERVIEW OF THE BUSINESS PRODUCTS, SERVICES, AND BRANDS

Luckywayz Limited B.V., incorporated on June 8, 2022, as a limited liability company under the laws of Curaçao, company number 161054, operates within the vibrant landscape of online gaming and entertainment. Headquartered at Abraham de Veerstraat 9, Curaçao (P.O. Box 3421), the company is steered by Ms. Jelizaveta Jakuseva, its esteemed sole director.

Under the regulatory framework provided by Curaca Gaming Authority, Luckywayz Limited B.V. has been granted license OGL/2024/1497/0884 on 14.04.2025 (with extension until 14.04.2026 in accordance with CGA notification ID/U1510/25 as of 14.10.2025). This pivotal licensure signifies our commitment to adhering to the highest standards of integrity and reliability in the online gaming industry.

Evolution of Brand Portfolio

Since its inception, Luckywayz Limited B.V. has strategically cultivated a diverse portfolio of brands, each tailored to meet the evolving demands of our discerning clientele. Notably, our brand offerings have undergone successive enhancements and expansions:

Initial Sublicense (July 11, 2022): Following the grant of sublicense GLH-OCCHKTW0707042022, our brand presence was marked by the esteemed URLs www.quattrocasino.com and www.alcatrazcasino.com.

First Renewal (July 11, 2023): In a testament to our enduring commitment to innovation and customer satisfaction, Gaming Services Provider N.V. renewed our sublicense, ushering in a new era represented by the introduction of www.starzino.com and www.koko.bet to our esteemed family of brands.

Expansion (January 11, 2024): Building upon our momentum, the latest renewal of our sublicense on January 11, 2024, heralded the addition of www.newlucky.com to our burgeoning constellation of brands, fortifying our foothold in the dynamic landscape of online gaming and entertainment.

New licensing regime Expansion (April 14, 2025): Luckywayz Limited B.V. was granted a license OGL/2024/1497/0884 which was extended to 14.04.2026 by CGA.

Through these strategic actions, Luckywayz Limited B.V. continues to carve a distinctive niche, offering unparalleled experiences to our valued patrons while championing the ethos of responsible gaming and regulatory compliance.

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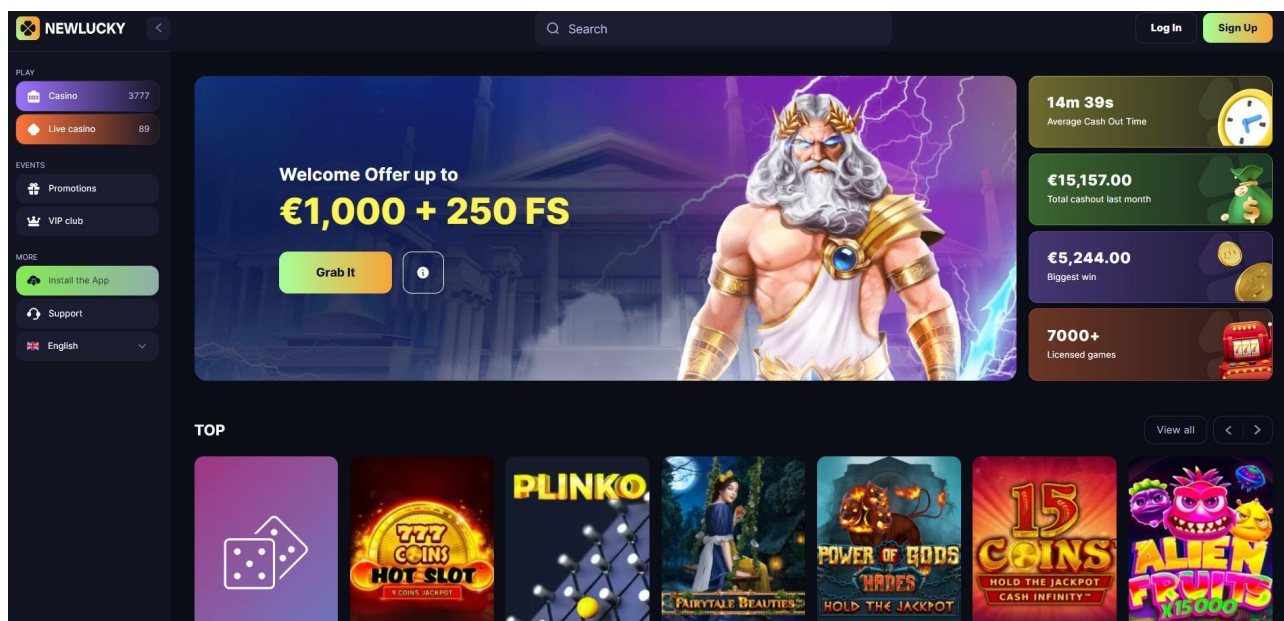
Overview of Brands

Under the corporate structure of Luckywayz Limited B.V., a diversified portfolio of online gaming brands has been developed and launched to address different player audiences, market segments, and geographic regions. Each brand is strategically designed to cater to specific player demographics, cultural preferences, gaming behavior patterns, and marketing distribution channels. This multi-brand approach allows the company to minimize market risks, increase acquisition channels, and efficiently test new jurisdictions and product strategies.

The current brand portfolio includes:

1. Newlucky Casino - <https://newlucky.com/>

Newlucky is an all-round entertainment platform targeting casual players through approachable design, straightforward onboarding, and broad game selection. The marketing approach prioritizes influencer partnerships, content-driven brand awareness, and community-based promotional campaigns.

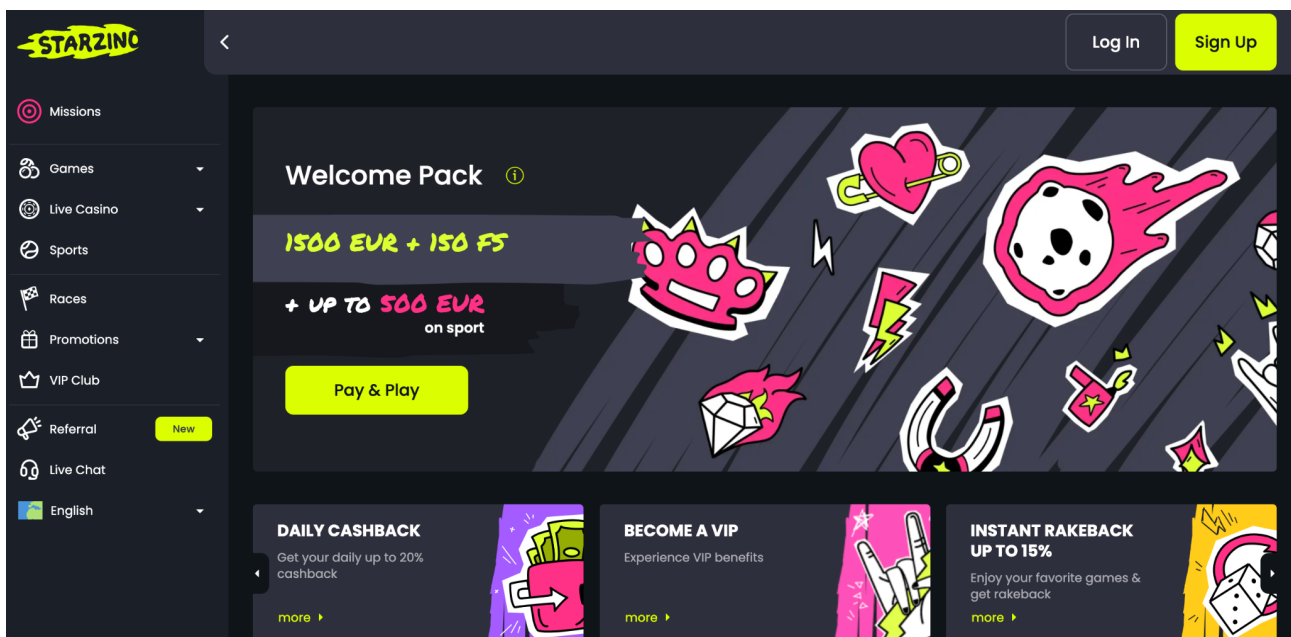


The initial page of Newlucky Casino (accessible by <https://newlucky.com/>)

2. Starzino Casino - <https://starzino.com/>

Starzino is positioned as a premium online casino and sportsbook brand focused on delivering high-quality entertainment, modern design, and advanced loyalty features. The user experience emphasizes polished UX/UI, fast onboarding, multi-currency operation, and competitive promotional offerings. Starzino primarily targets mid-to-high-value players and performance-marketing acquisition channels.

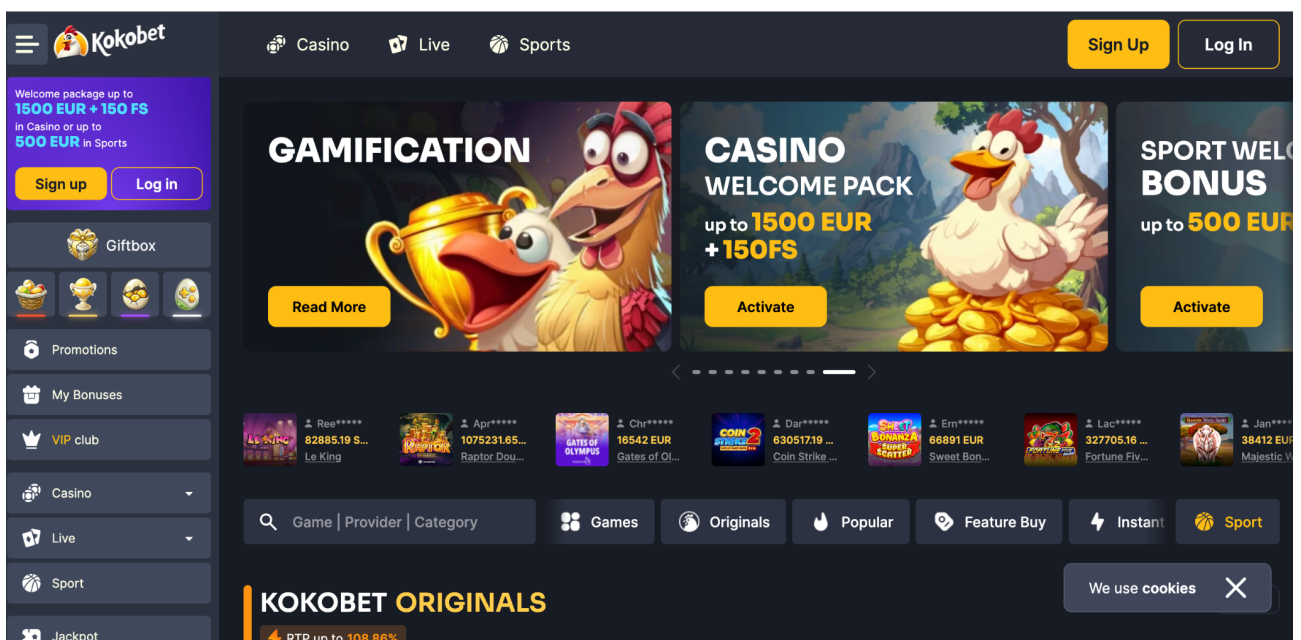
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The initial page of Newlucky Casino (accessible by <https://starzino.com/>)

3. Koko.bet Casino - <https://koko.bet/>

Koko.bet positions itself as a fast-growing entertainment casino brand, optimized for players who value simplicity, visual immersion, and frequent engagement. Without reliance on sportsbook products, its differentiation comes from user experience, gamified retention, and emotional brand atmosphere, making the platform attractive and sustainable across diverse growth markets.

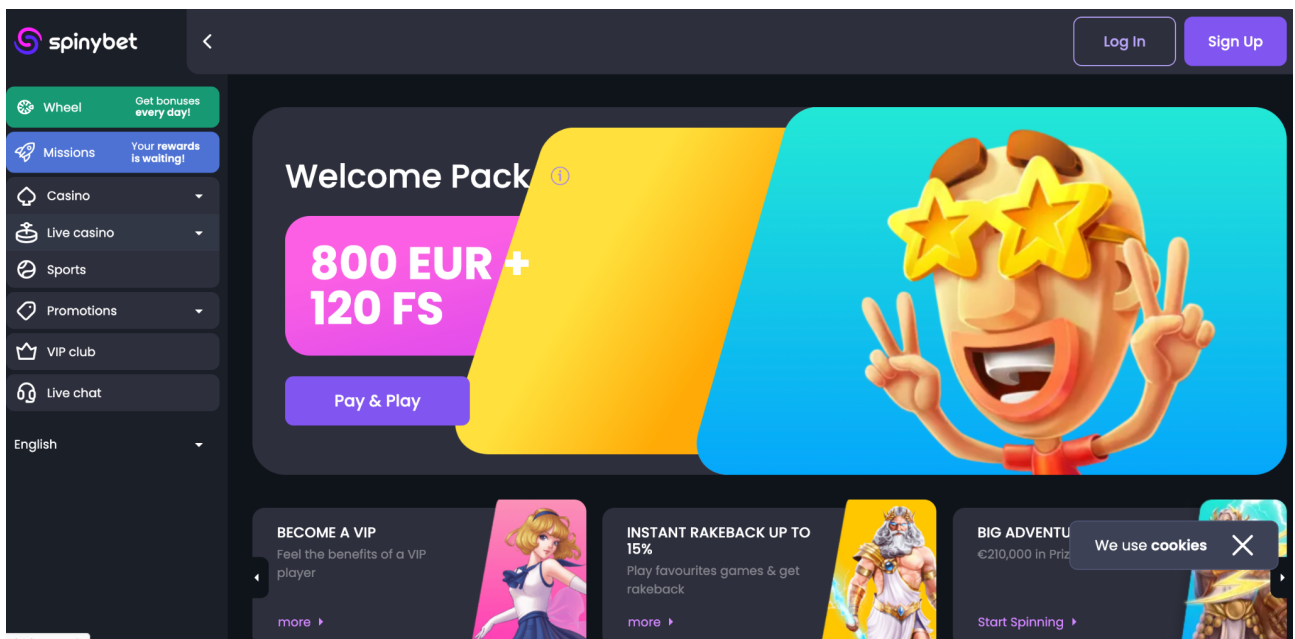


4. Spynibet Casino - <https://spinybet.com/>

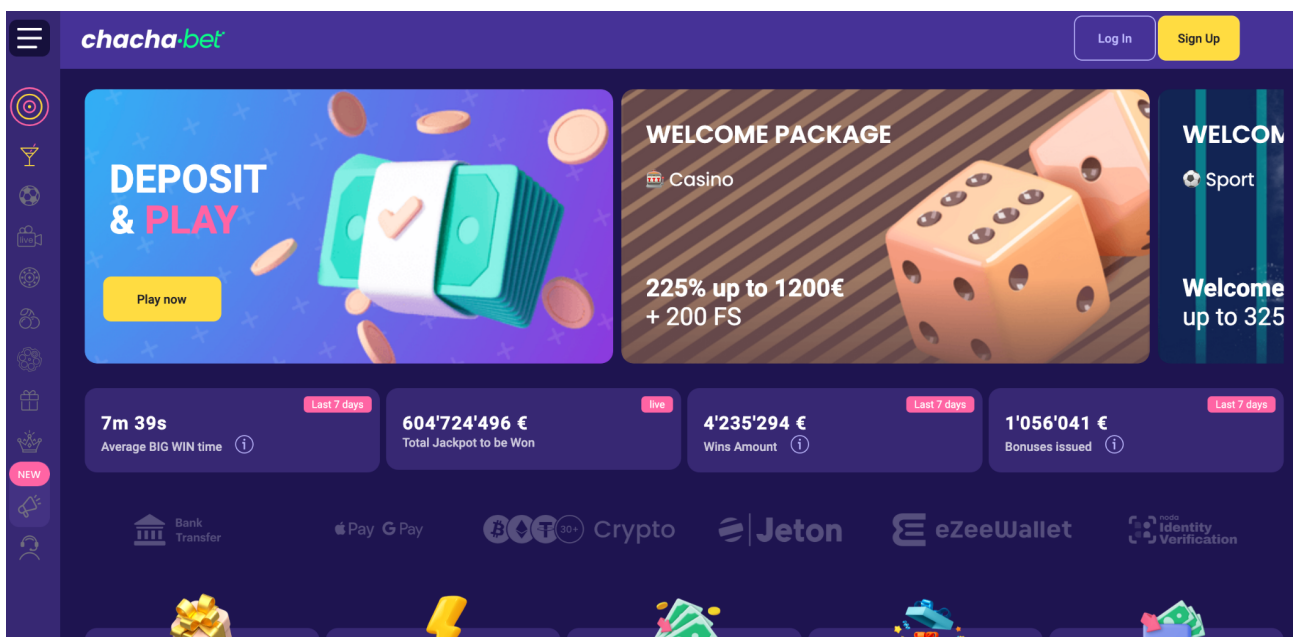
Spinybet focuses on high-volume casino players, particularly those drawn to video slots, jackpots, and tournament-based gaming dynamics. The brand places emphasis on

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gamified retention mechanisms such as daily missions, leaderboard competitions, and multi-tiered VIP structures.

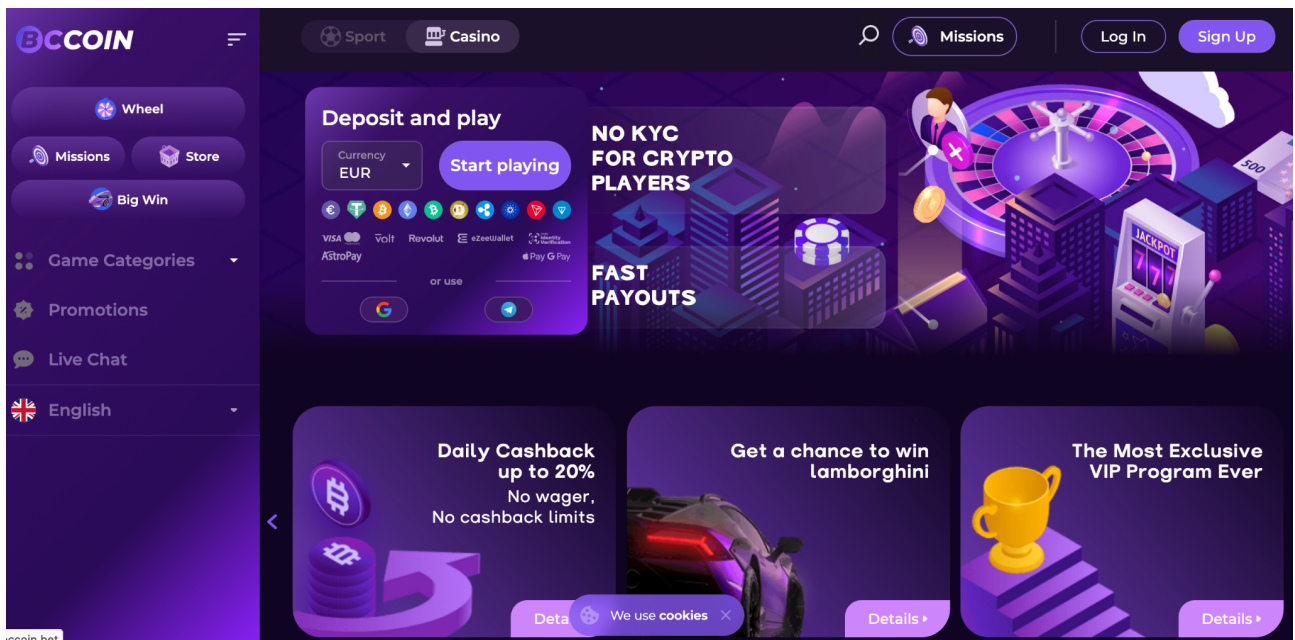


5. ChachaBet - <https://chacha.bet/>



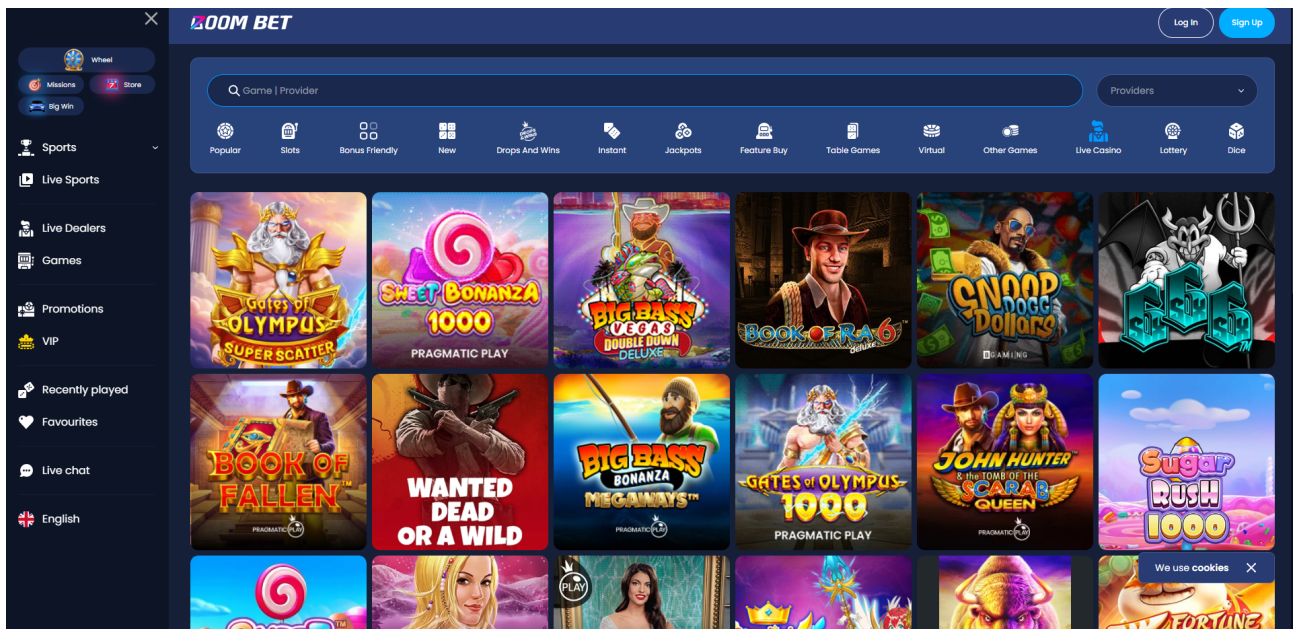
6. Bccion Casino - <https://bccoin.bet/>

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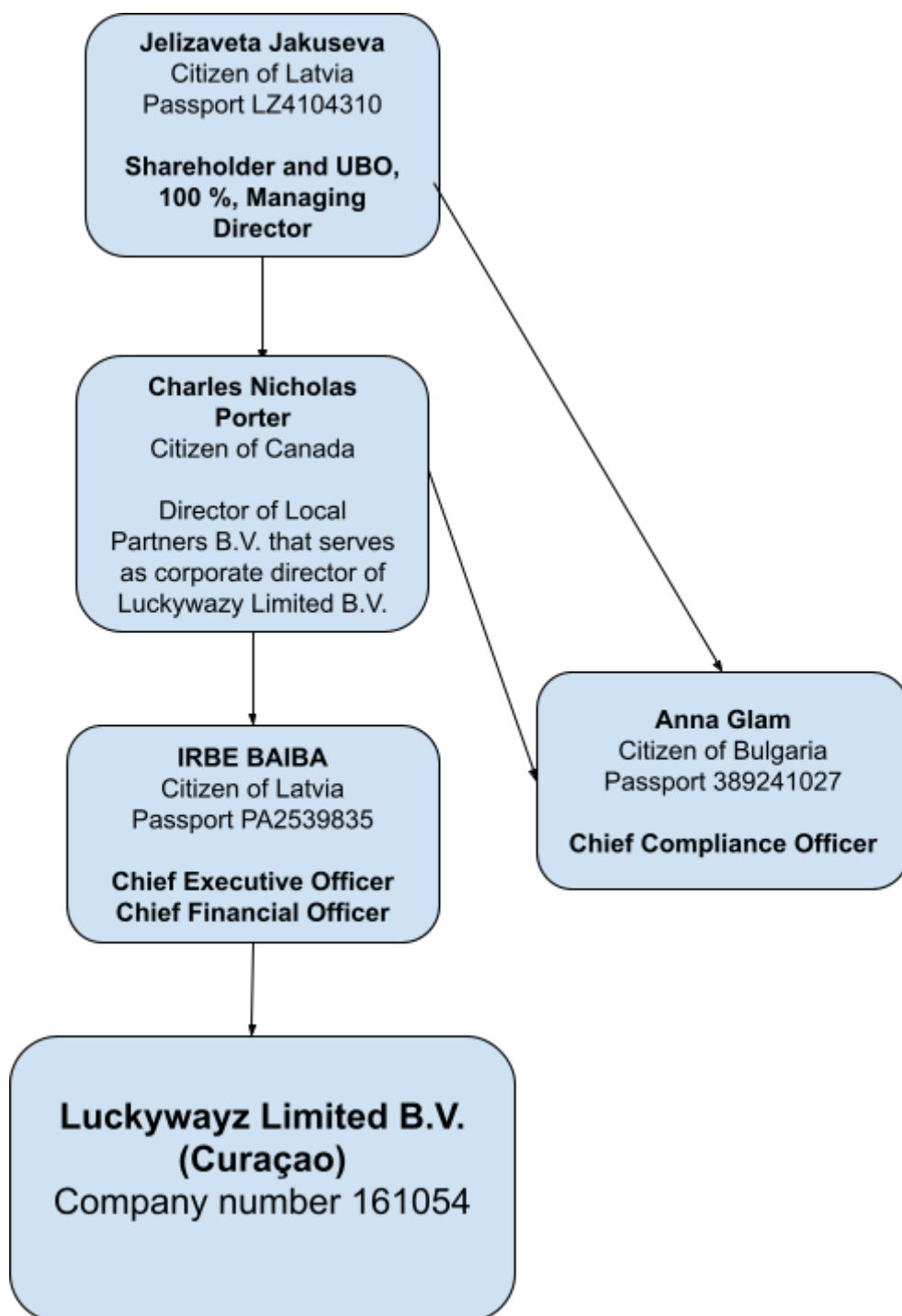
7. Play.boom-bet Casino - play.boom-bet.io

Play Boom-Bet is a sportsbook-centric online gaming platform designed for players who prioritize real-time sports engagement, competitive odds, and dynamic in-play betting experiences. While the platform also offers a comprehensive online casino portfolio, sports betting remains the core product driver and primary differentiation point.



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2. COMPANY MANAGEMENT STRUCTURE, SHOWING KEY MANAGEMENT ROLES AND REPORTING LINES



Company Management Structure:

Director and Ultimate Beneficial Owner (UBO):

- Jelizaveta Jakuseva

Chief Executive Officer (CEO) and Chief Financial Officer (CFO):

- Irbe Baiba

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Chief Compliance Officer (CCO):

- Anna Glam

Director of Local Partners B.V. that serves as corporate director of Luckywazy Limited B.V.

- Charles Nicholas Porter

Reporting Lines:

Jelizaveta Jakuševa, as the Director and Ultimate Beneficial Owner (UBO), oversees the overall strategic direction and operations of Luckywayz Limited B.V. She is responsible for ensuring alignment with company goals and objectives.

Underneath the Director and UBO, the executive team includes Irbe Baiba, who serves as both the Chief Executive Officer (CEO) and Chief Financial Officer (CFO). In this dual role, Irbe is responsible for managing the company's financial activities, overseeing budgeting, financial planning, and reporting. Additionally, as CEO, Irbe Baiba leads the executive team, sets organizational priorities, and drives business growth strategies.

Completing the executive team is Anna Glam, who serves as the Chief Compliance Officer (CCO). Ms Glam is responsible for ensuring that Luckywayz Limited B.V. operates in compliance with regulatory requirements and industry standards. She oversees the development and implementation of compliance policies and procedures, conducts risk assessments, and ensures adherence to legal and regulatory obligations.

Mr. Charles Nicholas Porter serves as Director of Local Partners B.V. that serves as corporate director of Luckywazy Limited B.V. His position is dictated by the CGA's rules regarding local substance.

Overall, this management structure provides clear separation of roles and logical reporting lines, with each key executive playing a vital role in the company's success and compliance efforts.

3. BUSINESS FORECASTS FOR 3 YEARS

Luckywayz Limited B.V., EUR '000

	2025	2026	2027
Revenue	40 000	45 000	50 000
Expenses, total	-11 700	-13 160	-14 6250
Game providers fees	-4 800	-5 400	-6 000
Payment fees	-2 800	-3 150	-3 500
Platform fee	-2 000	-2 250	-2 500
Services	-100	-110	-125
Bank fees	-2 000	-2 250	-2 500
Gross profit	28 300	31 840	35 375

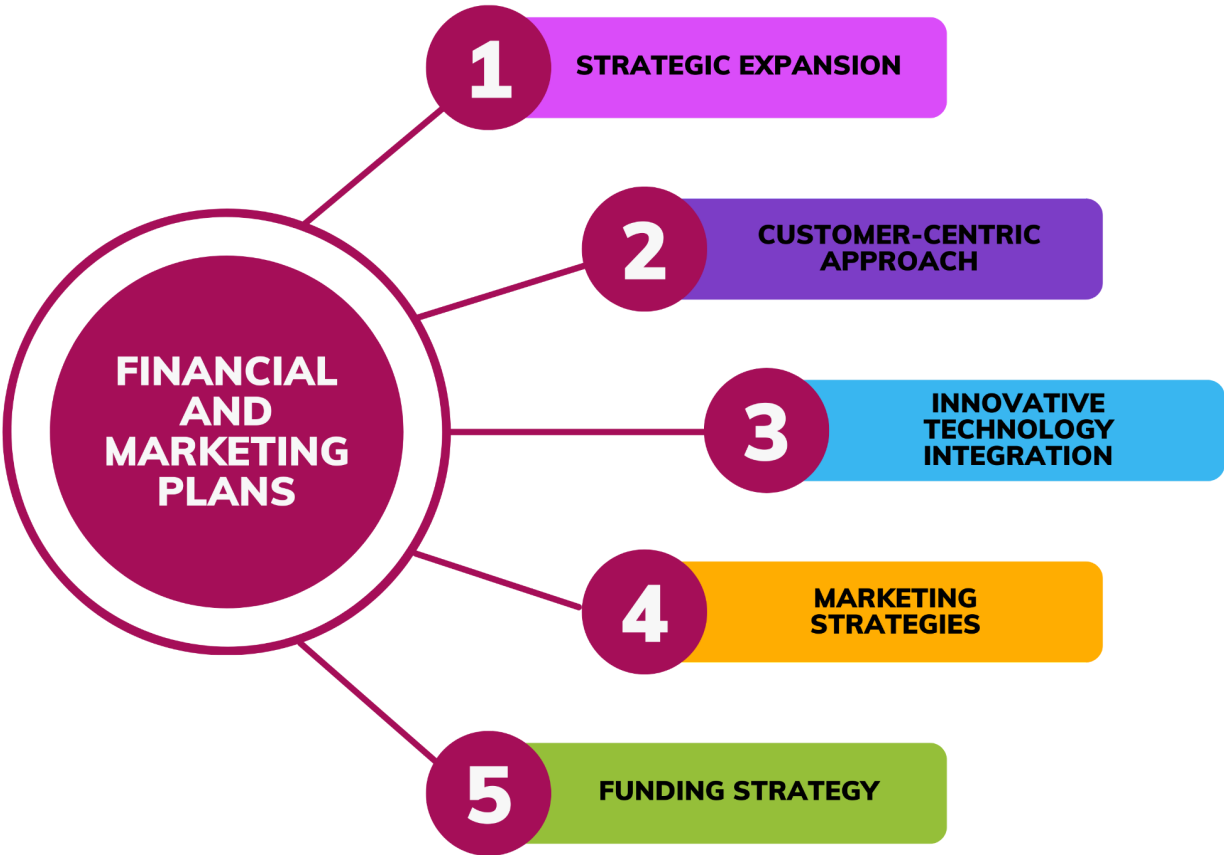
Gadzooks Limited (payment agent), EUR'000

	2025	2026	2027
Revenue	60	12	12
Expenses, total	-24	-9	-9
Legal costs	-20	-5	-5
Rent	-3	-3	-3
Bank fees	-1	-1	-1
Gross profit	36	3	3

The financial projections for Luckywayz Limited B.V. span a three-year period, extending from 2025 to 2027, indicating a strategic outlook on the company's anticipated performance in the online gaming sector.

4. INTENDED STRATEGY FOR BUSINESS GROWTH AND MARKET SHARE EXPANSION

Luckywayz Limited B.V. has devised a comprehensive strategy to propel its business growth and solidify its market position within the dynamic landscape of online gaming. This strategy encompasses targeted initiatives aimed at securing, maintaining, and expanding market share, supported by specific financial and marketing plans.



Strategic Expansion

Leveraging our robust financial projections, we are actively exploring opportunities to expand our market presence into new geographic regions while diversifying our product offerings. It's imperative to note that any expansion efforts will strictly adhere to Curaçao laws and local regulations governing online gaming operations. By meticulously evaluating various expansion options, we aim to tap into untapped markets and capitalize on emerging trends within the global gaming industry.

In line with our expansion strategy, we are planning to target online casino markets in LATAM countries, including Brazil, as well as in Poland and Slovakia. These regions offer significant growth potential and present opportunities to tap into emerging trends within the global gaming industry. Our approach involves conducting comprehensive market

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research and feasibility studies to identify the most promising opportunities for sustainable growth and market penetration.

Customer-Centric Approach

At the core of our growth strategy lies a steadfast commitment to a customer-centric approach. We are dedicated to delivering unparalleled gaming experiences and personalized services that prioritize user engagement and satisfaction. As part of our customer-centric initiatives, we are developing and implementing a comprehensive system of bonuses and rewards designed to enrich the gaming experience and incentivize long-term customer loyalty. Through continuous enhancements and tailored offerings, we aim to foster enduring relationships with our valued players, driving repeat business and sustained growth.

Innovative Technology Integration

Recognizing the pivotal role of technology in shaping the future of gaming, we remain steadfast in our commitment to innovative technological integration. In addition to enhancing our platform's performance and security, we are poised to expand our repertoire of available games to ensure a diverse and engaging gaming experience for our players. Furthermore, we are embarking on an ambitious data collection initiative aimed at identifying the most popular game types among our player base. This invaluable insight will inform strategic collaborations with game developers, enabling us to facilitate the creation of compelling and successful games that resonate with our audience, thus further enhancing player satisfaction and retention.

Marketing Strategies

Targeted Marketing Campaigns

Our marketing strategies focus on targeted campaigns across digital channels, including social media, search engine optimization (SEO), and affiliate marketing. These campaigns are designed to reach our target audience effectively, drive user engagement, and increase brand visibility.

Customer Retention Programs

In addition to customer acquisition efforts, we prioritize customer retention through loyalty programs, personalized promotions, and exceptional customer service. By fostering strong relationships with our existing customer base, we aim to maximize customer lifetime value and enhance brand loyalty.

Funding Strategy

Sustainable Growth

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Our funding strategy revolves around sustainable growth principles, ensuring that our expansion initiatives are adequately funded while maintaining financial stability. This may involve a combination of internal funding, strategic partnerships, and external financing options to support our growth objectives.

Excluded Markets

While we are committed to strategic expansion, we recognize the importance of prudent risk management. Certain markets may present regulatory challenges or limited growth potential, and as such, they are excluded from our expansion plans. This ensures regulatory compliance and mitigates risks associated with volatile or unfavourable market conditions.

Here is the list of the excluded markets.

1. Afghanistan
2. American Samoa
3. Australia
4. Austria
5. Belarus
6. Bonaire
7. Brunei Darussalam
8. Burma
9. Cayman Islands
10. Cuba
11. Curaçao
12. Cyprus
13. Deutschland (Germany)
14. Dutch West Indies
15. Ethiopia
16. France and its dependencies and territories
17. French Guiana
18. French Polynesia
19. French Southern Territories
20. Greece
21. Guam
22. Iran Islamic Republic of Jordan
23. Iraq
24. Israel
25. Laos
26. Lebanon
27. Libya
28. Malta
29. Myanmar
30. North Korea
31. Northern Mariana Islands

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32. Oman
33. Pakistan
34. Palestine
35. Portugal
36. Qatar
37. Russian Federation
38. Saint Barthélemy
39. Saint Eustatius, and Saba
40. Saint Martin
41. Samoa
42. Saudi Arabia
43. Serbia
44. Spain
45. Syria
46. The Netherlands
47. Ukraine
48. United Arab Emirates
49. United Kingdom
50. United States
51. United States Minor Outlying Islands
52. Virgin Islands, U.S.
53. Wallis and Futuna Islands
54. Yemen

In summary, Luckywayz Limited B.V. is committed to a strategic growth trajectory that emphasizes market expansion, financial prudence, and customer-centricity. By aligning our business forecast with targeted growth initiatives, we are confident in our ability to secure, maintain, and grow market share within the competitive online gaming landscape.

5. KEY SUPPLIERS AND MATERIAL DEPENDENCIES

Luckywayz Limited B.V. relies on a network of key suppliers and material dependencies to support its operations and deliver high-quality gaming experiences to its customers. These suppliers play a crucial role in providing essential products and services integral to our platform's functionality and success.

Game Providers

RubyPlay:

RubyPlay specializes in creating immersive and innovative slot games that offer players an unparalleled gaming experience. With a focus on quality and innovation, the company leverages HTML5 technology to ensure seamless gameplay across a wide range of devices. The team combines mathematical expertise with creative flair to develop captivating games that resonate with players.

Evolution:

Evolution is a leading provider of B2B online casino services, partnering with top-tier operators to deliver exceptional gaming experiences to players worldwide. Their comprehensive suite of software solutions, coupled with their robust infrastructure and talented team, adds significant value to the customers' gaming businesses.

NetEnt:

NetEnt is renowned for delivering premium gaming solutions to the world's most successful online casino operators. With a pioneering spirit and cutting-edge platform, the company continues to set industry standards with our thrilling games. Their team takes pride in offering flexible digital casino solutions that empower our customers to stay ahead of the curve and provide unique gaming experiences to their players.

Pragmatic Play:

Pragmatic Play stands as a leading game developer, supplying player-favorite titles to top global brands in the iGaming industry. Through their versatile API and diverse portfolio of products, including slots, live casino games, bingo, and more, they empower their partners to unlock new possibilities in gaming.

BGaming:

BGaming is a dynamic iGaming content provider, offering a diverse portfolio of products such as video slots, video poker, and lottery games. With a focus on creativity and innovation, they strive to deliver engaging gaming experiences to players worldwide.

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Hacksaw:

Hacksaw develops slots, scratchcards, and instant win games for leading brands and governments in the iGaming industry. Powered by their state-of-the-art Remote Gaming Server platform, our games offer unparalleled entertainment and excitement to players.

Wazdan:

Wazdan is dedicated to engineering the most rewarding casino game experiences, providing both operators and players with innovative entertainment. With a focus on delivering top-earning software and groundbreaking gameplay features, the company ensures that every gaming session is enjoyable and rewarding.

Play'n GO:

Play'n GO is a pioneering force in the online gaming industry, recognized for its unmatched portfolio of titles and commitment to innovation. With a presence in over 25 jurisdictions, they lead the industry by providing regulated casino operators with exceptional gaming solutions.

Red Tiger:

Red Tiger boasts a team of industry veterans dedicated to crafting exceptional casino games with a focus on player experience. With offices across Europe and Asia, their team is committed to continuous improvement and innovation, ensuring that the games deliver unparalleled entertainment to players worldwide.

Nolimit City:

Nolimit City is backed by a team of iGaming entrepreneurs with extensive experience in online casino operations. With a focus on interactivity and high production values, their games offer the best in HTML5 technology, featuring crisp graphics, engaging animations, and captivating soundtracks.

Payment Agents

Gadzooks Limited

Serving as our primary payment provider, Gadzooks facilitates seamless payment processing, ensuring secure and efficient transactions for our customers.

Material Dependencies

Technology Infrastructure

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Our platform relies on robust technological infrastructure to deliver a seamless gaming experience. Dependence on reliable internet connectivity, servers, and software systems is critical to maintaining uninterrupted service for our customers.

Regulatory Compliance

Compliance with regulatory requirements and licensing obligations is essential to our operations. Dependencies on regulatory frameworks and compliance measures necessitate ongoing monitoring and adherence to ensure legal and operational integrity.

Customer Support Services

Our commitment to exceptional customer service requires dependencies on reliable support systems and personnel. Ensuring prompt and effective resolution of customer inquiries and issues is integral to maintaining customer satisfaction and loyalty.

In summary, Luckywayz Limited B.V. acknowledges the importance of its key suppliers and material dependencies in supporting its operations and delivering value to its customers. By fostering strong relationships with these stakeholders and ensuring robust operational frameworks, we aim to mitigate risks and optimize performance in the competitive online gaming market.

6. RISK EVALUATION AND MANAGEMENT STRATEGY

At Luckywayz Limited B.V., we prioritize the mitigation of risks across all facets of our online casino operations to ensure continuity and sustained growth. Our proactive risk management strategy is underpinned by robust measures aimed at addressing potential threats effectively.



Specific Risks and Mitigation Strategies

1. Management Risks

Dependency on Critical Suppliers: We mitigate the risk of disruption in operations due to supplier failure by maintaining backup arrangements with alternative suppliers and establishing contingency plans.

Fraudulent Activities: Advanced anti-fraud system in place to detect and prevent fraudulent transactions, supplemented by continuous monitoring and investigation by our dedicated fraud prevention team.

2. Operations Risks:

Technical Glitches and System Failures: We oversee technical operations 24/7 to promptly address any bugs or system issues, ensuring minimal downtime and a seamless gaming experience.

Data Breaches and Security Threats: Robust encryption protocols and security measures protect sensitive information from data breaches, complemented by regular security audits and vulnerability assessments.

3. Finance Risks:

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Market Volatility and Currency Risks: Utilizing hedging strategies and closely monitoring market trends, we minimize exposure to currency fluctuations.

Liquidity and Cash Flow Management: Prudent financial practices, including maintaining cash reserves and optimizing working capital, mitigate liquidity risks and ensure financial stability.

4. Compliance Risks and Mitigations:

Regulatory Changes: Our compliance team monitors regulatory developments closely and adapts operations to comply with evolving regulations, particularly in key jurisdictions like Curaçao.

Market-Specific Regulations: Thorough assessments of regulatory requirements in target markets ensure compliance, with necessary licenses obtained to mitigate the risk of regulatory non-compliance.

Marketing Compliance: Oversight of marketing activities ensures compliance with regulatory guidelines, preventing regulatory violations.

Assessment and Mitigation Approach

Internal Risk Assessment: Regular risk assessments across management, operations, finance, and compliance allow us to identify potential risks, evaluate their impact, and develop mitigation strategies effectively.

Mitigation Strategies:

Upon identifying risks, targeted mitigation strategies are implemented to reduce their impact and likelihood of occurrence. This includes backup arrangements, anti-fraud measures, and cybersecurity enhancements.

Auditing and Oversight:

1. Independent Audits

We conduct periodic independent audits to assess the implementation of our risk management protocols, internal controls, and compliance with regulatory standards. These audits are carried out by reputable third-party audit firms, ensuring impartial evaluations of our risk management practices. Findings from these audits are meticulously reviewed and actioned upon, facilitating continual improvement and optimization of our risk management framework.

2. Board Oversight

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Our board of directors assigns strategic oversight of our risk management activities, ensuring alignment with our organizational objectives and regulatory requirements. The board convenes regularly to review risk assessments, mitigation strategies, and audit reports, offering guidance and direction to enhance our risk management practices. Their involvement ensures robust governance and accountability in managing risks across our operations.

3. Risk Management Committees

We have established dedicated risk management committees comprising cross-functional team members from various departments within the organization. These committees meet regularly to assess and address emerging risks, review risk registers, and propose enhancements to our risk management framework. Their collaborative efforts ensure comprehensive risk coverage and effective mitigation strategies tailored to our business needs.

4. Continuous Monitoring

We employ advanced monitoring tools and technologies to continuously monitor key risk indicators and trends across our operations. This proactive approach enables us to detect and respond to emerging risks in real-time, minimizing potential impacts and optimizing our risk management processes. Regular updates and reporting mechanisms ensure transparency and accountability in our risk management practices.

Through a combination of independent audits, board oversight, dedicated risk management committees, and continuous monitoring, Luckywayz Limited B.V. demonstrates a steadfast commitment to maintaining robust risk evaluation and management practices. By proactively identifying and addressing risks, we strive to safeguard stakeholder interests, foster resilience, and drive sustainable growth in the ever-evolving landscape of online gaming.

7. LEGAL AND GOVERNANCE FRAMEWORK

At Luckywayz Limited B.V., our legal and governance structure is the cornerstone of transparency, accountability, and sound decision-making. The board of directors plays a crucial role in providing oversight and guidance, ensuring adherence to the highest standards of corporate governance. Our current board composition comprises seasoned professionals from diverse backgrounds, enriching strategic discussions and operational considerations with their expertise.

Reserved for the board and Ultimate Beneficial Owners (UBOs) are pivotal responsibilities including strategic planning, major financial decisions, and corporate governance matters. These roles are fundamental in charting the company's course and aligning actions with long-term objectives. To mitigate potential deadlock scenarios, we have established clear protocols and escalation procedures to resolve conflicts or disagreements swiftly.

Legal guidance and support are provided by our in-house legal team, comprising experienced professionals specializing in corporate law and regulatory compliance. They offer insights on complex legal matters, ensuring our operations remain in compliance with relevant laws and regulations.

Board meetings may also include invited guests, such as industry experts, consultants, or regulatory advisors, based on agenda requirements and specific needs. A formal policy governs the invitation process, promoting transparency and adherence to established protocols.

8. TARGET KEY PERFORMANCE INDICATORS (KPIs) AND BUSINESS OBJECTIVES

At Luckywayz Limited B.V., we understand that measuring success and progress is essential for achieving our long-term business objectives. We have identified key performance indicators (KPIs) and established clear business objectives to guide our efforts and gauge our performance effectively.

1. Player Acquisition and Retention:

KPI: Monthly active users, customer acquisition cost (CAC), customer lifetime value (CLV).

Objective: Increase monthly active users by 20% annually while maintaining a CAC-to-CLV ratio below 1.5.

2. Revenue Growth:

KPI: Total revenue, average revenue per user (ARPU), revenue growth rate.

Objective: Achieve a minimum of 15% year-over-year revenue growth through diversified revenue streams and enhanced monetization strategies.

3. Customer Satisfaction and Loyalty:

KPI: Net Promoter Score (NPS), customer satisfaction (CSAT) score, churn rate.

Objective: Maintain a minimum NPS of 70, a CSAT score of 85%, and reduce churn rate by 10% annually through personalized customer experiences and exceptional service.

4. Market Share Expansion:

KPI: Market share percentage, brand awareness metrics.

Objective: Increase market share by 10% over the next three years through targeted marketing campaigns, strategic partnerships, and geographic expansion.

5. Regulatory Compliance:

KPI: Regulatory compliance score, number of regulatory violations.

Objective: Achieve and maintain a 95% regulatory compliance score and zero regulatory violations by adhering to all relevant laws and regulations in jurisdictions where we operate.

6. Operational Efficiency:

KPI: Cost per acquisition (CPA), operational expenses-to-revenue ratio.

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Objective: Reduce CPA by 15% annually and maintain operational expenses below 30% of total revenue to improve overall operational efficiency and profitability.

7. Technology and Innovation:

KPI: Technology adoption rate, innovation index.

Objective: Maintain a technology adoption rate of 90% and continuously improve our innovation index by investing in cutting-edge technologies and enhancing product offerings.

By tracking these KPIs and aligning our efforts with our business objectives, we aim to measure our success effectively and drive sustainable growth in the highly competitive online gaming industry.

9. POLICIES AND PROCEDURES

Luckywayz Limited B.V. has implemented a comprehensive internal control system comprising interlinked compliance, security, and customer-protection policies. Each policy is developed internally, approved by the Managing Director Ms. Jelizaveta Jakuseva, reviewed annually by the Money Laundering Reporting Officer (MLRO), and filed with the Curaçao Gaming Authority for oversight. All documents are designated *Private and Confidential* and maintained under secure document-management protocols.

1. Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT) Policy

This policy defines Luckywayz's framework for preventing, detecting, and reporting money-laundering, terrorist-financing, and proliferation-financing risks in accordance with:

- the *National Ordinance on Gambling (LOK, PB 2024 no. 157)*,
- the *Regulations for the Combating of Money Laundering, Financing of Terrorism and Proliferation of Weapons of Mass Destruction (January 2025)*,
- and FIU-Curaçao reporting obligations.

It establishes Customer Due Diligence (CDD), Customer Risk Assessment (CRA), transaction-monitoring, internal-escalation, and suspicious-activity-reporting procedures.

2. Know Your Customer (KYC) Policy

The KYC Policy provides a detailed due-diligence framework supporting the AML/CFT programme. It defines verification thresholds (initial €1 900 trigger; subsequent €2 000 triggers), CDD/EDD standards, PEP screening, sanctions checks, and documentation requirements. The policy applies a *three-lines-of-defence* structure and mandates periodic reviews based on risk tier. It prohibits accounts for politically exposed or sanctioned persons, enforces closed-loop payment systems, and integrates Responsible Gaming assessments into the financial-crime risk model.

3. Responsible Gaming Policy

This policy ensures that gaming remains a safe form of entertainment and that vulnerable players are protected.

Key components include:

- strict age-verification (18 +/ 21 + jurisdictions),
- visible information and self-help resources,
- continuous behaviour tracking and risk-profiling,
- cooling-off and self-exclusion tools (24 h – lifetime),
deposit, loss and session limits,
- employee and affiliate training, and

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- responsible marketing standards compliant with CGA guidance.

Behavioural alerts are reviewed by the Compliance Officer, with interventions ranging from contact and limits to exclusion and FIU referral where financial-crime suspicion overlaps.

4. Player Complaints Policy

This policy guarantees transparent, timely, and impartial complaint handling under Article 5.3 LOK. Players may submit complaints free of charge within six months via a standardized web form or email (compliance@luckywayz.com). Acknowledgement occurs within 2 days; resolution within 4 weeks (extendable once). If unresolved, the player is directed to an independent Alternative Dispute Resolution (ADR) entity at no cost. All complaints are logged, retained for 5 years, and reported bi-annually (January 15 and June 15) to the CGA with detailed statistics.

5. Information Security Policy

The Information Security Policy defines controls to ensure confidentiality, integrity, and availability of data across all operational systems. It aligns with GDPR and ISO/IEC 27001:2022 / 27002:2022 standards.

Key areas include:

- access-control and joiner/mover/leaver management,
- VPN-secured remote access and device encryption,
- information classification (Confidential, Restricted, Internal, Public),
- antivirus and firewall protections,
- backup and incident-response procedures, and
- annual security-risk assessments.

All breaches are escalated immediately to the Director and MLRO, ensuring full traceability and regulatory compliance.

6. Governance, Oversight and Review

All policies are approved by the Managing Director and reviewed annually or upon regulatory change. The MLRO maintains version control, enforces staff awareness training, and documents all reviews in the internal compliance register.

Independent audits are commissioned yearly to validate adherence to Curaçao's AML/CFT Regulations (2025), LOK, and CGA policy templates. Material amendments or incidents are reported to the CGA within ten business days.

7. Summary

Through this unified policy framework, Luckywayz Limited B.V. demonstrates effective governance, risk management, and player protection mechanisms consistent with CGA licensing requirements and international best practice. Each policy is operational,

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auditable, and actively monitored to ensure ethical, secure, and compliant i-gaming operations.