

Willemstad, October 22, 2025

Reference: CP/U1637/2025

Subject: Request for Clarification Regarding Operational and Corporate Disclosures

Dear Curaçao Gaming Authority,

We refer to your correspondence dated October 16, 2025 (Ref. CP/U1637/2025), regarding the ongoing review of Zozo Technology B.V.'s license application. We appreciate the Curaçao Gaming Authority's detailed examination of the submitted documentation and the opportunity to provide the requested clarifications.

Please find below our responses addressing each of the points raised in your letter.

1. Corporate Structure and Ownership

The most recent change of control from Michael Gatt to Dong Hyuk Shin was duly completed and reported as follows:

- a. The transfer of shares was recorded in the shareholder register on 8 November 2024, based on a Sale and Purchase Agreement dated 8 November 2024.
- b. The transaction was reported to the Gaming Control Board (GCB) on 4 December 2024, with all relevant documentation duly uploaded through the regulatory portal.
- c. Since 8 November 2024, and continuing to the present date, Mr. Dong Hyuk Shin has been the Ultimate Beneficial Owner and 100% shareholder of Zozo Technology B.V.

This change of ownership took place prior to the enactment of the National Ordinance of 20 December 2024 Containing Rules concerning Games of Chance (Landsverordening op de kansspelen) (PB 2024, no. 157) and was therefore governed by the National Ordinance on Offshore Games of Hazard (Landsverordening buitengaats hazardspelen) (PB 1993, no. 63). We consider that this change was executed in full alignment with the License Holder regulatory requirements that were applicable at the time of change of ownership.

At that time, there was no regulatory requirement to obtain prior approval from the Gaming Control Board for a change of control. The subsequent obligation to obtain such approval was introduced under the June 2025 Policy Guideline: License Holder Change in Control, Version 1.1. Accordingly, we understand that this requirement cannot be applied retroactively to transactions that occurred prior to its implementation.

We therefore consider that the change of ownership was executed in full compliance with the applicable regulatory framework in force at the time of the transaction.



Please kindly advise if the CGA requires any additional documentation or confirmation in support of this clarification.

The replies below were prepared in consultation with the operational team of Zozo Technology B.V. and the representatives of the proposed new shareholder, Mr. Yeh Tai Chun (the Applicant), as they relate directly to operational matters of the business and reflect the intentions of the business.

2. Platform Change and Operational Shift

The recent updates referenced in the Business Plan dated 13 October 2025 pertain primarily to the Applicant's development of a new iGaming platform and domain infrastructure. This initiative is designed to strengthen system stability, compliance functionality, and overall user experience.

The objective is to implement a core operational IT and control framework to be fully managed by the licensed entity, ensuring strict adherence to the Curaçao Gaming Authority (CGA) requirements and alignment with international security and data protection standards.

The upgraded platform integrates robust transaction monitoring, AML/KYC modules, and Responsible Gaming (RG) functionalities, providing comprehensive oversight and real-time reporting to the compliance department.

The introduction of this new platform is a necessary step to ensure business continuity and operational resilience, given that the former IT provider of the legacy platform has been phased out. The current system allows for centralized operations, a scalable technology stack, and full control over hosting, reporting, and technical certification compliance.

With respect to the operational timeline, the platform has been active with limited commercial activity as part of the Soft Launch phase following the insertion of the new domain URL token into the DNS on 12 September 2025. Upon receipt of regulatory approval for change of ownership, the platform will transition into live promotion and operation under the updated domain, ensuring compliant and uninterrupted functionality for the target market commercial player onboarding.

3. Third-Party Relationships and External Branding

While certain games available on the platform are expected to be self-developed and proprietary, the Applicant confirms that not all games will be internally developed. As part of its standard operational model, the Applicant will enter into agreements with reputable third-party game providers and payment service providers (PSPs) to ensure a diverse and compliant product offering to its players.

At present, the Applicant has active agreements with the following:

- **Game Providers:** Fachai and Tada
- **Payment Service Providers:** Paykassma: Paykassma.com and A-pay: A-pay.one



All such third-party integrations are conducted under formal agreements that clearly define technical, operational, and compliance responsibilities, and are aligned with regulatory requirements under the applicable Anti-Money Laundering regime.

Any branding visible on the website that may appear associated with other entities is limited to standard supplier or integration attributions (e.g., game provider logos or PSP identifiers) and does not indicate any operational control or ownership by those entities.

In addition, the Applicant presently maintains a limited, temporary contractual arrangement with Twocent Technology Limited (“Twocent”), confined strictly to providing technical support related to the maintenance and updating of the website’s regulatory compliance framework.

This engagement is governed by a short-term, fixed-duration agreement entered into solely between the Applicant and Twocent, which will remain in effect until the CGA formally approves the pending ownership transfer. The purpose of this arrangement is exclusively to ensure the website’s continuous compliance with applicable technical and regulatory standards during the transition period.

Twocent has no operational, managerial, or decision-making authority over the platform, player accounts, or any other aspect of business operations. All actions undertaken by Twocent are performed strictly under the direction and supervision of the Applicant, in furtherance of licensed entity regulatory obligations.

Furthermore, Twocent holds no equity, ownership, or control interest in the Applicant or the licensed entity, nor will it acquire any such interest in the future. Its role remains purely technical and transitional. The platform and its games are proprietary to the Applicant, although certain titles may incorporate third-party licensed content or technology not related to Twocent.

Supporting documentation, i.e. the executed Master Services Agreement (July 2, 2025)—will be made available to the Curaçao Gaming Authority upon request.

4. Responsible Gaming Policy

The Applicant confirms that its Beta operational framework and internal procedures fully comply with the Responsible Gaming (RG) policies published on its website and are aligned with the Curaçao Gaming Authority’s Responsible Gaming Guidelines, including Self-Exclusion and Cooling-Off provisions.

All RG mechanisms are currently supported by contacting customer support, however automation is being developed and will be embedded directly within the player account interface, which will enable users to activate self-exclusion for 1 year, 2 years, 5 years, 10 years, or lifetime, and cooling off for 24 hours, 7 days, 1 month, or 3 months, thus ensuring account access is suspended for the chosen duration while all account and transaction data remains securely stored as per CGA guidelines.



The Beta platform also includes deposit limits, time-out reminders, and reality checks, which are available to players through the platform interface or support channels. RG resources and support links remain permanently accessible via the website footer and the dedicated “Responsible Gaming” section.

To maintain continuous compliance with evolving CGA expectations, the Compliance Department conducts periodic reviews of RG functionality in collaboration with the IT and Legal teams. A formal annual policy review shall be regularly scheduled, or sooner where mandated by the regulator, ensuring ongoing consistency between operational practice, website content, and regulatory obligations.

5. Services Offered: Reference to Crypto Futures

The references to “crypto futures” on the jb.com website relate exclusively to a separate trading service that is not part of the Applicant’s gaming operations. These features are provided and operated by Nexus Play LLC, a licensed brokerage company authorised and regulated by the Mwali International Services Authority (M.I.S.A.) under Licence No. BFX2024137. All futures- and options-related activities are conducted entirely under that licence and regulatory regime.

The Applicant does not operate, manage, or derive revenue from any exchange, trading, or derivative activity. Within jb.com, the gaming environment remains distinct and governed solely under the Curaçao gaming license. Integration between the two environments is limited to shared account access, with functional, technical, and compliance segregation maintained at all times.

Should the CGA deem any reference or linkage to constitute a regulated financial service within the gaming scope, the Applicant will promptly amend or remove such references to ensure full compliance.

6. Financial Capacity and UBO Funding Commitment

The company acknowledges the CGA’s request for clarification regarding its financial capacity and confirms that the Applicant has committed sufficient personal funds to sustain all stages of the project, including pre-launch, certification, and initial commercialization.

Pursuant to the Loan Agreement dated 16 October 2025 between Mr. Yeh Tai Chun (“Lender”) and Zozo Technology B.V. (“Borrower”), the Applicant has undertaken to provide USD 194,738.32 from his personal funds. These resources are allocated to cover operational and administrative expenses, licensing and certification fees, compliance-related costs, and the working capital required for business continuity.

The agreement expressly states that the loan is interest-free, that funds originate from legitimate personal sources, and that disbursement will occur immediately following completion of the ownership transfer. This arrangement demonstrates the Applicant’s good-faith commitment to adequately capitalize the company and ensure ongoing compliance with CGA financial and regulatory standards.

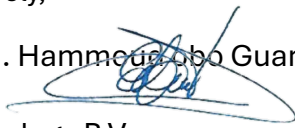


This funding mechanism guarantees that Zozo Technology B.V. remains financially stable throughout all setup, licensing, and launch phases. The company will further increase its capital base with subsequent shareholder contributions for operational growth, ensuring long-term financial sustainability.

Supporting documentation, including proof of available funds, and Business Plan (October 13, 2025) financial projections—are annexed to this letter.

We trust that the above clarification sufficiently addresses the Authority's request. Zozo Technology B.V. remains fully committed to maintaining transparency and cooperation throughout the ongoing assessment process and to ensuring continuous compliance with all applicable Curaçao gaming regulations. Should the Curaçao Gaming Authority require any further documentation or additional information, we will be pleased to provide it promptly upon request.

Yours sincerely,

Gouloud M. Hamme  obo Guardian Corporation Curaçao B.V.
Director
Zozo Technology B.V.

Date: July 18, 2025

To Whom It May Concern,

This letter is to certify that Mr. Yeh Tai-Chun has been an active and verified user of the CWallet Platform since March 19, 2021, and remains an active user as of the date of this letter.

Throughout this period, Mr. Yeh Tai-Chun has engaged in a variety of cryptocurrency investment activities via our platform, including but not limited to the purchase, trading, and holding of multiple crypto assets.

Based on our transaction and performance records, the cumulative net profit realized by Mr. Yeh Tai-Chun through investments conducted on CWallet to date amounts to 145,209.30 USDT.

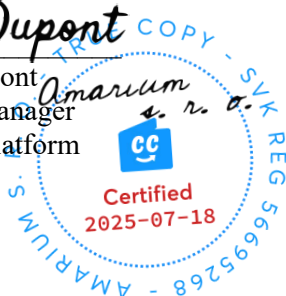
This certification is issued at the request of the user and reflects only the activities and balances within the CWallet Platform. It does not account for any assets or transactions conducted outside our system.

Should further verification be required, please feel free to contact us.

Sincerely,

chloe Dupont

Chloe Dupont
Product Manager
CWallet Platform



JB.COM Business Plan

Casino Games & Sports Operations



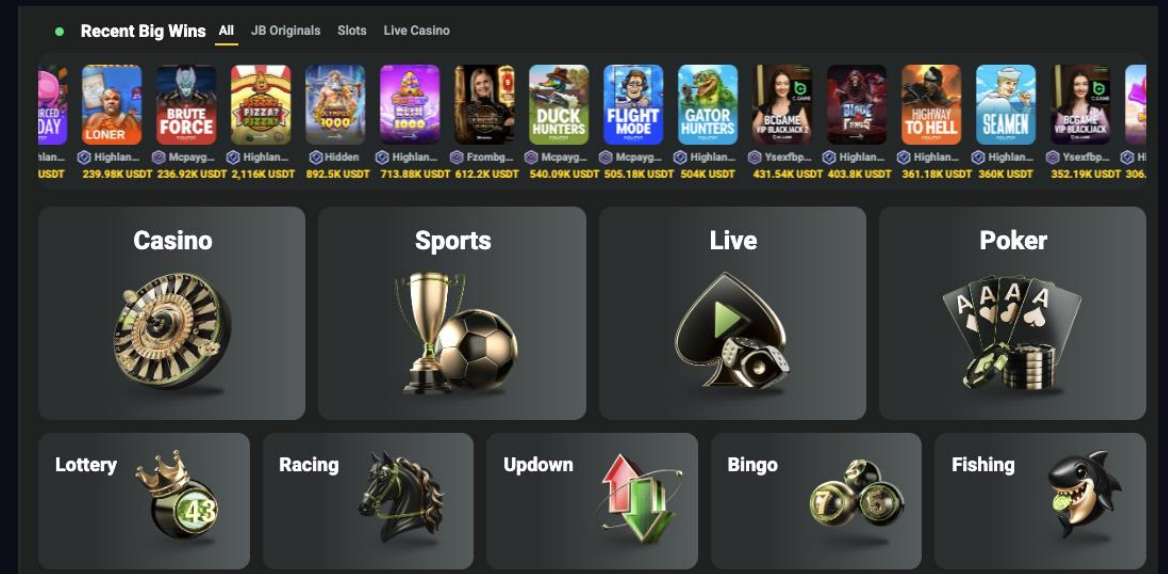
Market Outlook & Opportunity

- Global iGaming market > USD 153B by 2030 (11.7% CAGR)
- Drivers: Digitalisation, mobile-first, crypto adoption
- JB.COM launch in 100+ countries with localisation
- Aggressive expansion into LATAM & Africa



JB.COM Overview

- Next-gen crypto-native online entertainment platform
- Focus: Casino Games, Sports, Poker, Lottery
- Active in 100+ countries
- Core mission: Transparency, fairness, innovation
- Strict AML / KYC / CFT compliance
- 9M+ users, Target for € 30B+ bet volume, € 1B GGR in 5 years
- Strong brand partnerships & global recognition
- Robust Licensing framework
- Commitment to responsible gaming
- Diversified revenue streams
- Proven scalability



Infrastructure & Innovation

- 150+ CRYPTOCURRENCIES SUPPORTED
- PROVABLY FAIR BLOCKCHAIN GAMES
- TOKENISED IN-GAME ECONOMY & EXCHANGE INTEGRATION



NFT INTEGRATION:
REWARDS, IDENTITY,
STAKING

**DAO-INSPIRED
GOVERNANCE**



Statutory Board

Gouloud Hammoud – Director A

- Representing GFC Group, headquartered at Kaya Richard J. Beaujon z/n, Landhuis Joonchie II, Curaçao, Dutch Caribbean (P.O. Box 6248, Tel: +599 (9) 733 1839).
- Brings corporate governance expertise and local market presence, supporting the company's long-term sustainability and regulatory compliance.
- Provides administrative oversight, approves major business decisions, and ensures regulatory alignment with Curaçao Gaming Control Board (GCB) regulations.
- The Board meets regularly to review financial, operational, and compliance reporting.
- Review financial, operational, and compliance reports. Matters reserved to the Board include approval of strategic initiatives, review of enterprise risk assessments, and oversight of compliance reporting.
- The Board will ensure continuous engagement with regulators, adapting swiftly to any changes in Curaçao or international frameworks to maintain uninterrupted operations and licensing compliance

CEO & UBO

Tai-Chun Yeh



- Mr. Yeh is the principal founder, ultimate beneficial owner, and active board director.
- With over a decade of experience in iGaming & blockchain infrastructure and decentralized systems, he has been instrumental in shaping the strategic direction, compliance framework, and technical architecture of the platform.
- Proven experience in product development, platform operations, and B2B partnerships across Asia, Europe, and LATAM. Provides entrepreneurial leadership and global market insight.

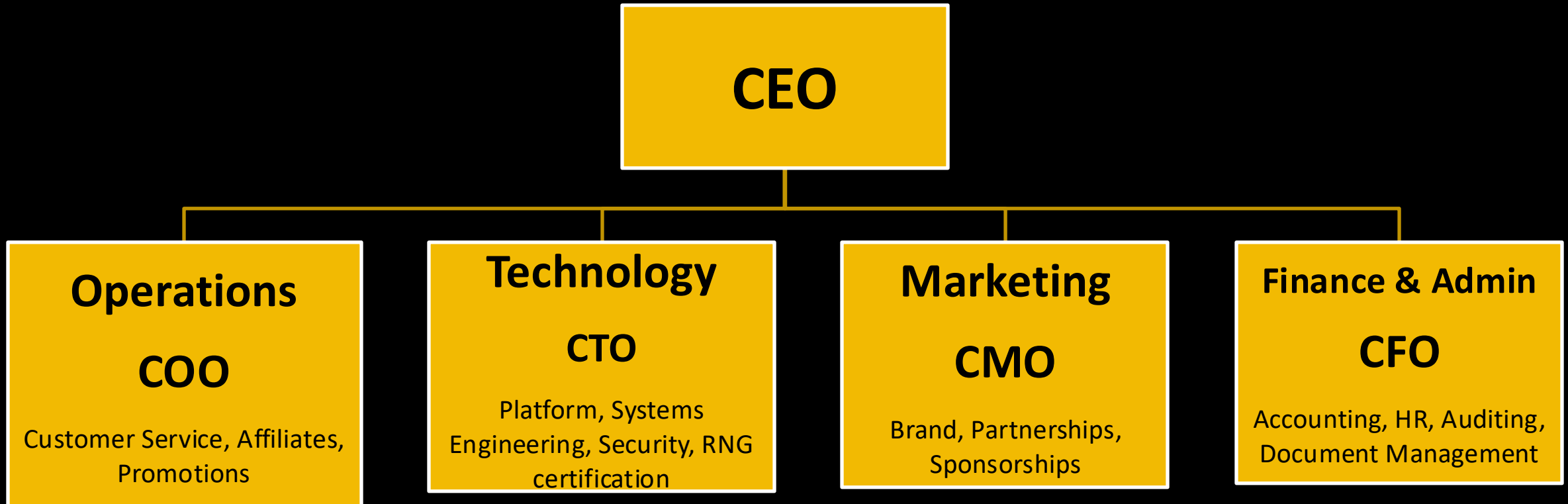
Compliance Officer

Emmanuel Waruga Kimani

- Legal and compliance professional with 5+ years' cross-border experience in East Africa.
- Former Legal Counsel at Rubis Energy Kenya PLC and BonRezo Ltd. Expertise in AML/CFT compliance, corporate governance, and regulatory reporting.
- Independent function reporting directly to the Board.
- Will establish enhanced due diligence protocols, independent monitoring dashboards, and quarterly compliance reporting to the Board to strengthen oversight



Functional Departments under CEO



Senior Management to be Filled

Certain senior management roles are currently in the process of being filled:

- Chief Financial Officer (CFO) – To Be Recruited (TBR)
- Chief Technology Officer (CTO) – To Be Recruited (TBR)
- Chief Commercial Officer (CCO) – To Be Recruited (TBR)
- Chief Marketing Officer (CMO) – To be Recruited (TBR)

Recruitment processes are underway, with the CEO and Board providing interim oversight of these functions until suitable candidates are appointed.

The Org Chart

Job.com



Administration



Finance

Accounting, Auditing



Legal and Compliance

License Management



Admin

Document Management,
Project Support, and Task
Tracking



HR

Hiring, Recruitment,
Compensation, and
Promotion



Platform Technology



Platform System

Wallets, Members,
Promotions



Systems Engineering

Frontend, Backend



Security

Testing, Anti-Fraud,
System maintenance



Design

Art design, Company
branding



Operations



Marketing

Affiliate, Ads, Influencers,
Exhibitions, Sponsors



Operations

Product content &
Promotion, Risk
management, Data Analysis



Customer Service

Membership Management,
VIP client care

Financial Forecast & Sustainability

- Revenue: house edge, tokenised economies, NFTs, crypto exchange
- Double-digit YoY growth expected
- First-mover advantage in LATAM, Africa, Web3 gaming
- Prudent cost management
- Scenario-based planning
- Diversified revenue streams
- Focus on sustainable profitability

Unit: EUR'000	Sept~Dec 2025	2026	2027
Games (Slot, Live, Sportsbook, Affiliate Program) Players Deposit	92,000	195,200	254,500
(minus) Withdraw	82,894	176,727	229,014
Total Income	9,106	18,473	25,485
Game & Software Providers Fee	723	1,497	1,955
Affiliate/Referral Program Bonus	212	374	520
Total Operation Cost	935	1,871	2,475
Total Gross Revenue	8,171	16,602	23,010
Marketing Expenses	1,679	3,979	4,011
Operation System Expenses	960	2,551	2,571
Employees Expenses	1,681	2,347	2,543
Other Operating Expenses	480	1,326	1,131
Total Operation Expenses	4,801	10,204	10,256
Net Profit / Loss before Tax	3,370	6,398	12,754

Marketing & Partnerships

Promotion

**Great Deposit Bonus
in Casino or Sports
Up TO 150% Bonus + 20
FB/400 FS**

Deposit Now **More Details**

			
120% Bonus	100% Bonus	150% Bonus	100% Bonus
1st Deposit	2nd Deposit	3rd Deposit	4th Deposit

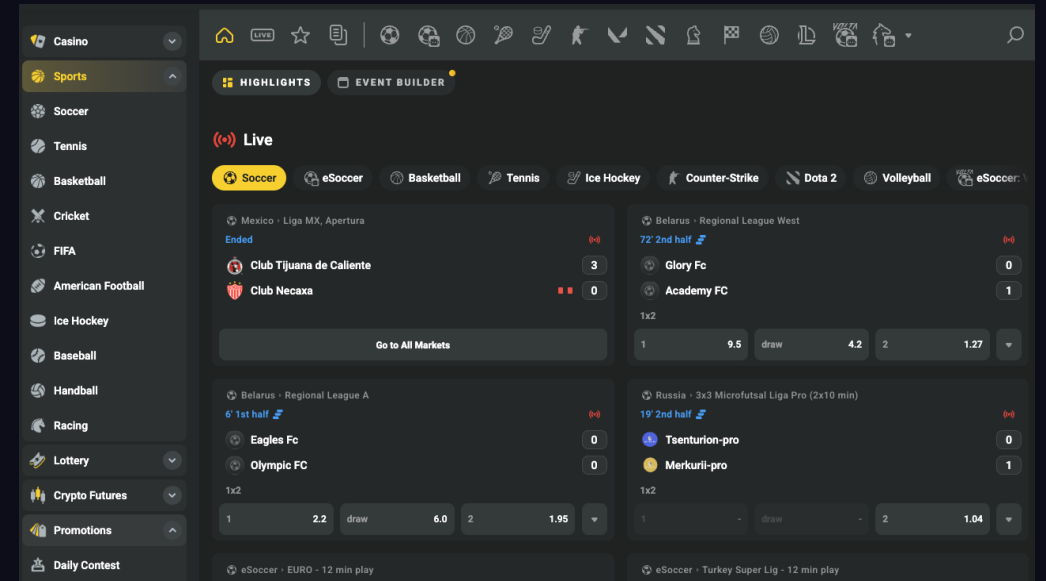
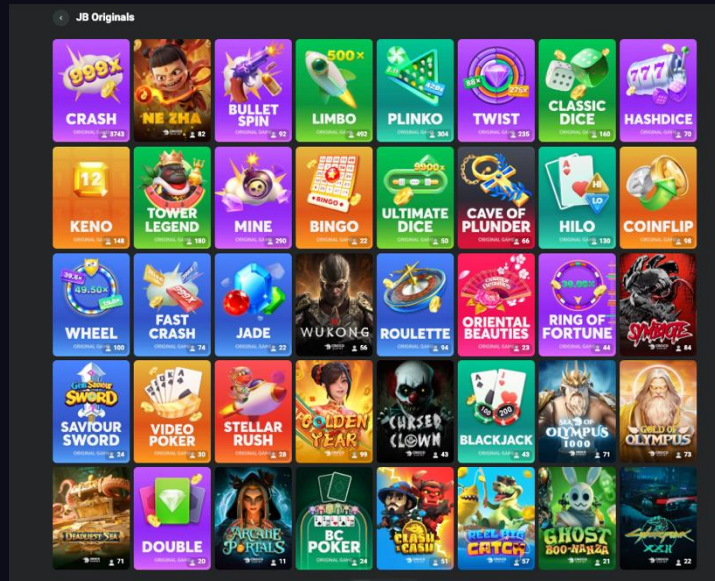
- Endorsed by SiGMA, InsideBitcoins, Bitcoin.com
- Game providers partnerships with over Best 100+ companies (ie. Evolution, Pragmatic Play, Hacksaw, Nolimit City, Push Gaming, Play'n GO, Playtech, etc.)
- Strategic brand positioning, Focus on player acquisition & retention, data driven marketing and partnership diversification.
- Sponsorships: Esports teams

Join Our Global Community

- <https://t.me/jbcomofficials>
- https://x.com/jbcom_official
- <https://www.facebook.com/jbcomofficial/>
- https://www.instagram.com/jbcom_official/

Games Profile



- Types & Number of Games: Self-developed games, Casino games, Sports, Poker, Lottery (Several thousands games in total)
- Software Used: Proprietary self-developed platform (provably fair, RNG-certified)
- Game Process: Conducted via RNG-certified software; secure, transparent mechanisms
- Available Prizes: Cash prizes credited to accounts; occasional promotional bonuses
- Payment Acceptance: Deposits via bank cards, e-wallets, cryptocurrencies
- Winnings Payout: Automatically credited to player's account balance
- Sports Betting Regulation: Odds provided by licensed providers, aligned with fair betting practices

Excluded / Blacklisted Countries

In accordance with Curaçao licensing obligations and internal risk policies, JB.COM does not permit players from the following countries or regions to access its services:

NL ANTILLES	EU	ASIA	N. AMERICA
Aruba, Bonaire, Curaçao, Saba, Statia, Sint Maartin	Austria, France, Germany, Malta, Netherlands, Spain, UK	Australia	USA and outlying territories

PLUS, the following default areas are restricted:

- French Guiana, French Polynesia, French Southern Territories
- Isle of Man
- Saint Barthelemy, Saint Martin (French), Sint Maarten (Dutch)
- United Kingdom (excluding Northern Ireland), United Kingdom of Great Britain and Northern Ireland, Virgin Islands (British)
- United States Minor Outlying Islands, Virgin Islands (U.S.)

Key Suppliers & Material Dependencies

Game Content Providers

- Partnerships with leading studios such as Evolution, Pragmatic Play, Hacksaw, Nolimit City, Push Gaming, Play'n GO, Playtech, and others.

Payment Gateways

- Multi-currency support through global partners covering fiat and crypto rails, with redundancy in case of service disruption.

KYC/AML Providers

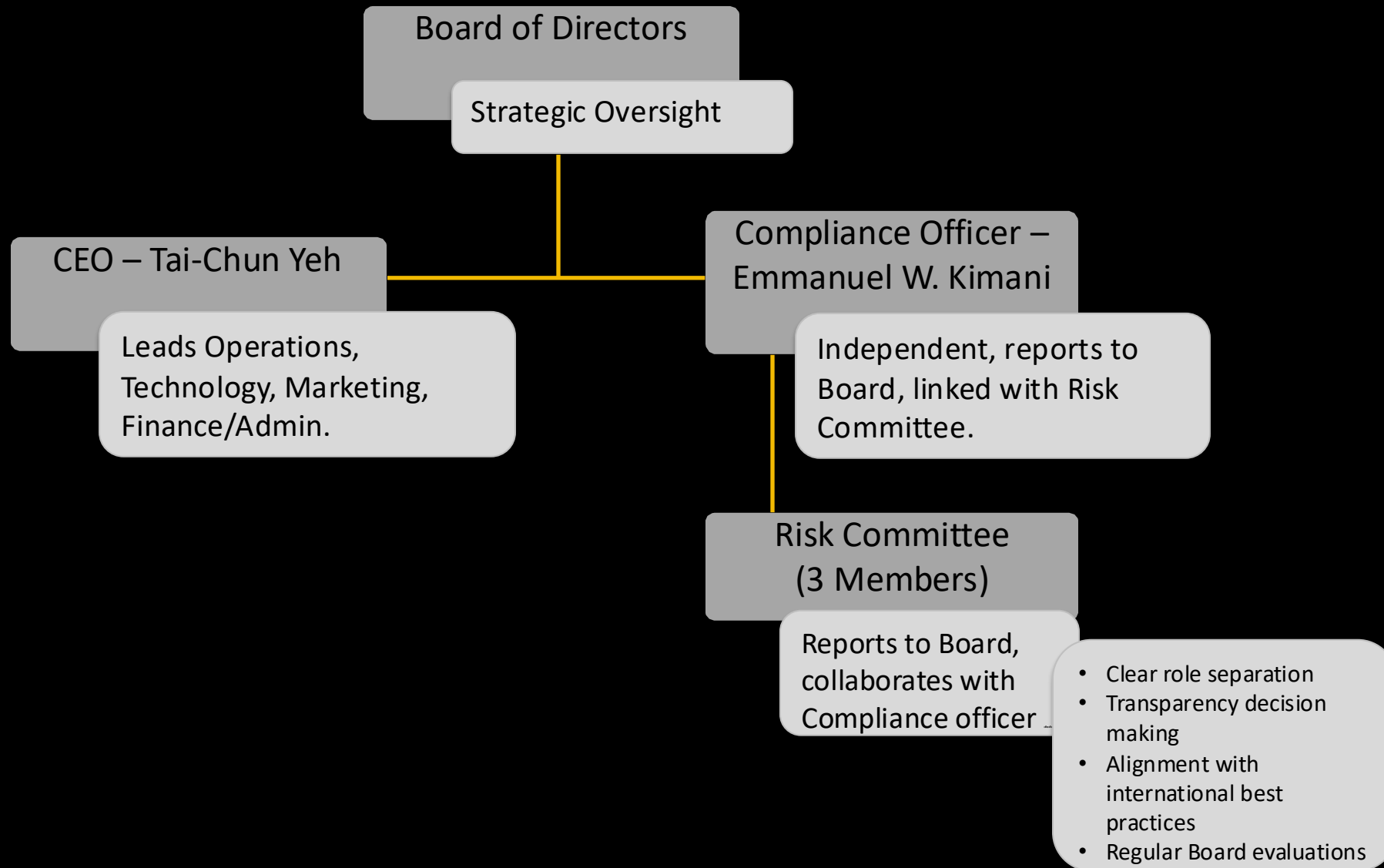
- Integration with specialized providers ensuring robust identity verification and sanctions screening.

Hosting & Security

- Cloud infrastructure partners offering scalable, secure hosting with DDoS protection and RNG certification.

- ❖ JB.COM's operations rely on carefully selected, reputable suppliers and partners
- ❖ Supplier performance is reviewed quarterly. Contracts include continuity clauses, and alternative providers are pre-identified to reduce operational dependency.
- ❖ Supplier due diligence
- ❖ Diversification strategy
- ❖ Business continuity planning
- ❖ Regular performance audits

Legal and Governance Framework



Risk Committee

- Established with 3 members, reporting to the Board.
- Monitors enterprise risk, reviews internal audits, and ensures mitigation measures are implemented.
- Independent oversight role ensuring objectivity in risk assessment and reporting.
- Regular risk reviews integrated with compliance and audit cycles.
- Dynamic risk register updated quarterly to capture emerging regulatory, operational, and market risks.
- Direct escalation channel to the Board for material risk events.

Risk & Compliance Framework

- Clear separation between business leadership (CEO) and compliance oversight (Compliance Officer).
- Risks are assessed, documented in a risk register, and reviewed by the Risk Committee and Board.

ESG & Sustainability

Committed to sustainable and responsible growth.

Promotes environmental sustainability by prioritizing digital operations over paper-based processes and working with suppliers who adopt eco-conscious practices.

Upholds strong social responsibility through responsible gaming policies, fair employment practices, and community engagement in its key markets.

Governance standards are reinforced by independent compliance oversight, a three-member Risk Committee, and a transparent Board structure.

Ensure JB.COM operates in line with international ESG principles while maintaining long-term business resilience

KPIs & Objectives

Revenue growth

- Sustained double-digit year on year growth, driven by diversified revenue streams and innovate products.

Market expansion

- LATAM and Africa as priority regions.
- Continuous expansion of the global user base with strong focus on retention and loyalty.

Compliance

- 100% AML/CFT audit readiness.
- Zero regulatory fines; 100% timely reporting to regulator.

Operations

- Maintain uptime of 99.9% on platform services.
- 24/7 Platform uptime with 0,1% critical incident rate.

Responsible Gaming

- Continuous monitoring and reporting framework.

Customer-Centric Metrics

LTV (Lifetime Value)

- Tracking the net value generated per player over time.

CAC (Customer Acquisition Cost)

- Monitoring marketing and promotional spend efficiency.

LTV/CAC Ratio

- Targeting a ratio above 3.0, aligning with industry benchmarks for sustainable growth.

Policies & Procedures Outline

- JB.COM maintains comprehensive internal policies and procedures covering AML/CFT, Responsible Gaming, Data Privacy, and Operational Integrity.
- These policies are developed by qualified professionals under the oversight of the Compliance Officer, with external reviews and audits conducted where necessary.
- The company is committed to keeping the Curaçao Gaming Control Board informed of any material updates and ensuring that all procedures remain current, effective, and fully compliant with applicable regulations.
- Regular training & awareness programs for all staff to ensure policies are embedded in daily operations.
- Independent audit cycle scheduled annually to validate effectiveness and compliance.
- Dynamic policy updates aligned with evolving regulatory requirements across jurisdiction.
- Centralized documentation system to track implementation, version control and staff acknowledgment.