

ZOZO TECHNOLOGY B.V.

License No. OGL/2024/1519/0809

To: Curaçao Gaming Authority (CGA) — Compliance Division

From: Emmanuel Waruga Kimani, Compliance Officer — Zozo Technology B.V.

Date: 24 March 2026

Subject: Response to Notice of Non-Compliance — Ticket ADMIN-20565

Policy reference: Zozo Technology B.V. — AML Policy v2.1 (24 March 2026)

Dear CGA Compliance Team,

We write on behalf of Zozo Technology B.V. (the "Company") in formal response to the Notice of Non-Compliance issued on 20 March 2026 under Ticket ADMIN-20565 (the "Notice"), which identified two findings in relation to the Company's customer onboarding process and geographic access controls.

We acknowledge the findings and confirm that remedial action has been initiated. An updated Anti-Money Laundering Policy — AML Policy v2.1, effective 24 March 2026 — has been approved and is enclosed with this correspondence. We address each finding in turn below.

Finding 1 — Customer KYC Data Not Collected at Registration

The Notice states that customers are able to register an account by providing only an email address, and that this does not meet applicable AML requirements or the Company's own submitted policy, which requires full KYC data to be collected prior to permitting any deposit activity.

Response

We acknowledge this finding. The Company's technical onboarding implementation did not fully reflect the intent of §5.1 of AML Policy v1.0. We note that this represents an implementation gap rather than a policy gap — the correct standard was already required by our submitted policy.

To remediate this finding and to formalise our onboarding controls, AML Policy v2.0 introduces a clearly defined five-stage onboarding gate in §5.1, as follows:

- Stage 1 — Account creation: The customer provides only an email address, username, and password. No financial activity is permitted.
- Stage 2 — Email OTP verification: A one-time passcode is sent to the customer's registered email address. The customer must verify their email before proceeding. No deposit functionality is accessible at this stage.

- Stage 3 — Full KYC data collection and ID upload: Upon successful email verification, the customer is required to complete a full KYC form — comprising full legal name, country of residence, place of birth, date of birth, residential address, nationality, and identification number — and to upload a valid government-issued identification document. These fields represent the minimum mandatory requirements under NOIS and CGA licensing conditions. Deposit functionality remains locked until this stage is successfully completed.
- Stage 4 — Jurisdiction check: The system automatically validates the customer's country of residence against the Restricted Jurisdictions List (Appendix I to AML Policy v2.0). Customers from restricted jurisdictions are blocked from proceeding.
- Stage 5 — Financial activity enabled: Deposit and withdrawal functionality is activated only after successful completion of all preceding stages.

The IT and Compliance teams are currently implementing the technical controls to enforce the Stage 3 KYC gate. The Company will notify the CGA upon completion of the technical implementation.

Finding 2 — Website Accessible from Restricted Jurisdictions

The Notice states that the website appears to be accessible from certain restricted jurisdictions, and that the Company is required to ensure it is not targeting, servicing, or allowing access from jurisdictions where such activity is prohibited or where it does not hold the necessary legal authorisation.

Response

We confirm that IP-based geo-blocking controls are already operational and are currently enforced for all jurisdictions where the Company does not hold regulatory authorisation or where online gaming is otherwise prohibited. This technical control was in place prior to the issuance of the Notice.

In addition, as part of the updated onboarding model described above, country-of-residence validation has been incorporated into Stage 3 of the onboarding gate. Customers who select a restricted country from the drop-down will receive a 'service not available' notification and will be unable to activate their account.

AML Policy v2.0 now formally codifies the Restricted Jurisdictions framework in §4.2 and introduces Appendix I — a definitive, signed Restricted Jurisdictions List, reproduced in summary form below:

Region / Group	Restricted Jurisdictions
NL Antilles / Caribbean Kingdom territories	Aruba Bonaire Curaçao (domestic jurisdiction) Saba Sint Eustatius (Statia) Sint Maarten Saint Martin (French part)

	Sint Maarten (Dutch part — drop-down variant)
European Union	Austria France Germany Greece Malta Netherlands Spain
Europe (non-EU regulated)	United Kingdom United Kingdom (excl. Northern Ireland) — drop-down variant United Kingdom of Great Britain and Northern Ireland — drop-down variant Isle of Man
French overseas territories	French Guiana French Polynesia French Southern Territories Saint Barthélemy
North America	United States of America United States Minor Outlying Islands Virgin Islands (U.S.)
British overseas territories	Virgin Islands (British)
Asia / Pacific	Australia

The full Appendix I (27 restricted entries across 7 regional groups) is included in AML Policy v2.0, enclosed herewith. The list encompasses:

- All NL Antilles / Caribbean Kingdom territories (Aruba, Bonaire, Curaçao, Saba, Sint Eustatius, Sint Maarten, and related French/Dutch sub-designations)
- Seven European Union member states (Austria, France, Germany, Greece, Malta, Netherlands, Spain)
- United Kingdom and Crown Dependencies (including Isle of Man and all drop-down variants)
- French overseas territories (French Guiana, French Polynesia, French Southern Territories, Saint Barthélemy, Saint Martin)
- North America (USA, U.S. Minor Outlying Islands, Virgin Islands U.S.)
- British overseas territories (Virgin Islands British)
- Asia/Pacific (Australia)

The Restricted Jurisdictions List will be reviewed and formally reapproved by the Compliance Officer at least annually, cross-referenced against FATF high-risk jurisdiction designations, U.S. INCSR reports, and the Company's CGA licence conditions.

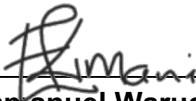
Summary of Remedial Actions

- AML Policy updated to v2.0 — incorporates staged five-gate onboarding model (§5.1), occupation fields as mandatory KYC data (§5.1), and formalised Restricted Jurisdictions framework with definitive country list (§4.2 and Appendix I)
- Geo-blocking at IP level — already operational for all restricted jurisdictions
- Stage 3 KYC gate (technical implementation) — in progress; the Company will notify CGA upon completion
- Country drop-down restriction at onboarding — to be implemented as part of Stage 3 technical rollout
- Restricted Jurisdictions List (Appendix I) — finalised, signed, and enclosed with this response

The Company is fully committed to meeting its obligations under the CGA licence conditions and applicable AML/CTF legislation. We welcome any further guidance from the Authority and remain available to discuss these matters or provide additional documentation upon request.

Please do not hesitate to contact us should you require any clarification.

Yours sincerely,



Emmanuel Waruga Kimani

Compliance Officer

Zozo Technology B.V.

License No. OGL/2024/1519/0809

24 March 2026

Enclosure: Zozo Technology B.V. — AML Policy v2.1 (24 March 2026), including Appendix I — Restricted Jurisdictions List