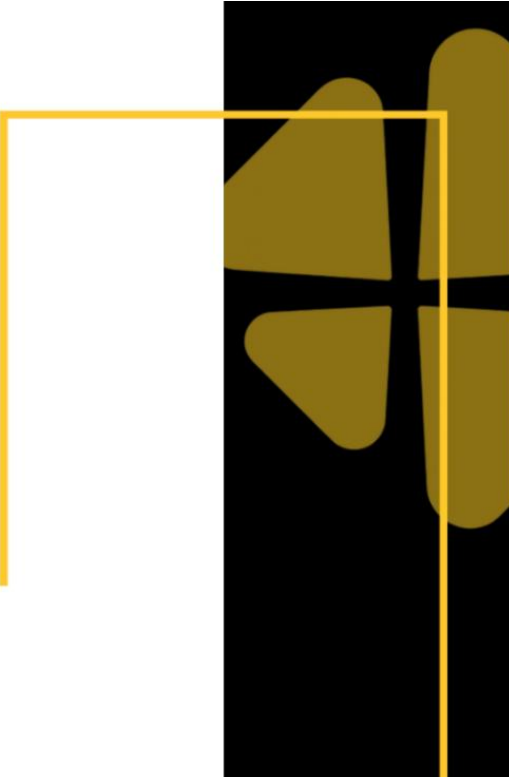




OPERATIONAL MANUAL FOR GAMES OF CHANCE: STRUCTURE AND COMPLIANCE

-MIC Group Entertainment N.V.-

TÍTULO I: COMPLIANCE STATEMENT AND LICENSE VALIDITY

1.1 Purpose of the Manual and Regulatory Scope

This Operational Manual explains how MIC Group Entertainment N.V. offers its online games of chance, where the main objective is to demonstrate that the company conducts its activities responsibly and transparently, complying at all times with the laws of Curaçao and with all the conditions established in its gaming license.

1.2 Fundamental Principles of Operation

The gaming operation is based on three fundamental principles, which may be reviewed and verified at any time:

1. **Financial Integrity:** Players' funds are kept separate and are never mixed with the funds used by the company for its operations.
2. **Game Fairness:** All game outcomes are generated completely at random, with no possibility of manipulation.
3. **Complete Traceability:** Every bet and every monetary transaction is recorded, allowing for the review and reconstruction of each player's full activity whenever necessary.

TITLE II: PLAYER ACCOUNT MANAGEMENT SYSTEM

2.1 Player Identification and Acceptance (KYC)

Natural persons may register on the platform; however, before making their first withdrawal, the player must complete an identity verification process confirming that their personal data are real and unique. This procedure aims to prevent fraud and ensure compliance with regulations that prevent the misuse of funds, thereby guaranteeing a secure and transparent gaming environment.

2.2 Segregation of Funds and Wallets

The company's main system is responsible for maintaining the real and accurate control of each player's funds; however, these funds must always remain separate from the money the company uses for its operations.

It is the company's obligation that each time a player performs an action—such as depositing, withdrawing, betting, or receiving winnings—the system automatically updates their balance and creates a unique record that allows each transaction to be identified and reviewed.

2.3 Responsible Gaming Policy

The system includes controls that help players maintain healthy and safe gaming behavior:

Self-Exclusion: The player may request that their account be temporarily or permanently suspended. When this occurs, the system immediately blocks any attempt to make deposits or place bets.

Gaming Limits: The player may set limits on the amount of money they wish to deposit, lose, or the time they spend playing. If the player attempts to exceed any of these limits, the system will not allow the bet or deposit to be processed.

TITLE III: PROHIBITION OF KEY PERSONS

3.1 Control of Accounts for Key Personnel

In accordance with the Corporate Governance Policy, the system preventively blocks the accounts of all employees considered key personnel. This means that such individuals cannot open gaming accounts, make deposits, or place bets within the platform. This measure ensures the protection of the company's funds and prevents potential conflicts of interest.

TITLE IV: Ensuring Fairness

4.1 Function and Certification of the Random Number Generator (RNG)

The Random Number Generator (RNG) is essential to ensure that games are fair and reliable, as this system is independent from the rest of the platform and its sole function is to produce random, unpredictable results. Before beginning operations, the RNG must be reviewed and certified by an independent entity to ensure its proper functioning.

4.2 Cryptographic Seed Mechanism

The system uses a special method to ensure that game results cannot be predicted or manipulated:

1. Each game result is generated using the seed from the previous game.
2. Once the result is generated, the system creates and stores a new seed for the next game.
3. The seed used and the game round number are always recorded, allowing each result to be reviewed and audited when necessary.

4.3 Game Records and External Audit

All game results, together with the seed used and the number of each round, must be recorded in a data system that cannot be modified and can only be read. This system is available in real time to the external auditor of the Curaçao license, allowing for the review and verification that the games are fair and accurate.

TITLE V: THE TRANSACTIONAL LIFE CYCLE

5.1 Secure Execution of Bets

When a player places a bet, the system ensures that the operation is completed correctly or, in the event of an error, that the transaction is fully reversed. This guarantees that no funds remain trapped and no incorrect balances appear in the player's account.

5.2 Mandatory Processing Sequence

Every bet request must follow this strict sequence:

1. Risk Validation: Confirmation that the player is not self-excluded and has sufficient funds.
2. Transactional Initiation: The system initiates a Database Transaction.
3. Debit and Record: The balance in the player's Wallet is reduced. A transaction of type "Bet" is recorded, linked to a unique Game Round ID.
4. Result Generation: The Random Number Generator module is used to determine the game result and the player's winnings.
5. Credit and Record: If there are winnings, the balance in the Wallet is increased. A transaction of type "Winnings" is recorded, linked to the same Game Round ID.
6. Closure and Commitment: The transaction is confirmed only if all steps are successful. If any failure occurs, a reversal is executed.

5.3 Financial Traceability

The game round number serves as the main link between the system that ensures the randomness of results and the one that controls player balances. This number is the clear and verifiable proof used by auditors to confirm that each movement of money is directly related to a fair and accurate game result.

TITLE VI: DATA SECURITY AND FRAUD DETECTION

6.1 Information Protection

All player information, including personal data and transaction history, is stored in secure databases protected by advanced encryption systems. Access to this information within the company is restricted solely to personnel who genuinely need it to perform their duties, thereby guaranteeing the privacy and security of players.

6.2 Security Logs

The company maintains detailed records to monitor and protect the system. These logs make it possible to detect and review:

1. Failed login attempts that may indicate unauthorized access.
2. Changes made to player accounts, such as data updates or limit adjustments.
3. Attempts to access the most sensitive parts of the system by unauthorized individuals.

6.3 Anti-Fraud Mechanisms

The system includes automated tools that help detect suspicious behavior that may indicate fraud or improper collaboration between players. These tools allow the company to:

1. Monitor the use of multiple accounts from the same address or device.
2. Analyze unusual money movements, such as deposits or withdrawals that do not match the player's usual behavior.
3. Implement bet coupon payment limits to control financial exposure and mitigate the risk of game manipulation.

TITLE VII: DISPUTE RESOLUTION AND REGULATORY CONTACT

7.1 Player Complaint Protocol

If a player disagrees with the outcome of a game or a transaction, they may file a formal complaint through the support channel. The company will review the case using the game and transaction records to reconstruct the events and make a fair and transparent decision.

7.2 Regulatory Escalation

If the player is not satisfied with the resolution of their complaint, they will be informed of their right to bring the case before the Curaçao Licensing Authority. The company will provide the official contact information of the regulator so the player can continue the process directly and transparently.

7.3 Compliance Reporting

The Company is committed to providing the Curaçao Authority with periodic reports that include transactional volume, verification of segregated funds, and self-exclusion history, ensuring the continued fulfillment of the license requirements.