

OPERATIONS MANUAL

Just Entertainment B.V.

Version: 1.0

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1. Introduction

Just Entertainment B.V., registered under company number 160603 and holding Curaçao B2C Online Gaming Licence No. OGL/2024/164/0246, is a company incorporated in Curaçao and authorized to provide online gaming services.

The Company provides online gaming services through websites and domains approved under its Curaçao B2C Online Gaming Licence.

This Operational Manual has been prepared in accordance with Article 5.9 of the National Ordinance for Games of Chance (LOK) and outlines the Company's operational framework, internal controls, and compliance measures applicable to its licensed gaming activities.

2. Games and software description

2.1. Gaming Portfolio

Just Entertainment B.V. (the “Company”) operates remote games of chance offering a diverse portfolio of online games supplied by licensed and approved gaming providers. The gaming portfolio may include, but is not limited to, the following categories:

Slot	Games:
Digital reel-based games where outcomes are determined through certified Random Number Generator (RNG) technology or other approved randomization mechanisms implemented by the respective game provider.	

Table	Games:
Online versions of traditional casino games, including blackjack, roulette, baccarat, poker variants, dice games, and similar products. Outcomes are determined by RNG technology or other approved game-specific mechanisms.	

Live	Casino	Games:
Real-time gaming products streamed from licensed gaming studios and conducted by live dealers. Outcomes are determined by physical gaming equipment, live game procedures, and associated capture and verification technologies.		

Instant	Win	and	Original	Games:
A range of proprietary and third-party games designed specifically for online play, including crash games, dice games, plinko-style games, wheel games, and other innovative gaming formats. Depending on the game type, outcomes may be determined through certified RNG systems, provably fair technologies, cryptographic verification methods, or other approved outcome-generation mechanisms.				

Jackpot	Games:
Games linked to standalone or progressive jackpot systems where a portion of eligible wagers may contribute to a shared prize pool. Jackpot accumulation, triggering	

conditions, and prize distributions are managed through automated software systems operated by the relevant provider or platform.

Cryptocurrency-Compatible Games:
Gaming products that support wagering and settlement in one or more supported digital assets. Such games operate under the same fairness, integrity, and outcome-determination principles as other gaming products offered on the platform.

Sports Betting and Virtual Sports:
Sports betting products allow wagers on real-world sporting events and virtual sports events. Settlement is based on official event results, data feeds, or approved settlement procedures provided by authorized suppliers.

The exact gaming content available on the platform may vary over time depending on commercial arrangements, regulatory requirements, supplier integrations, and operational considerations.

2.2. Payment possibilities, bets, and payout mechanics

The Company provides players with access to a variety of payment methods through licensed and approved payment service providers, banking partners, electronic payment systems, and cryptocurrency payment processors, subject to availability in the player's jurisdiction.

The platform supports transactions in multiple fiat currencies and, where applicable, selected cryptocurrencies. Available payment methods and currencies may vary depending on the player's location, regulatory requirements, risk profile, and operational considerations.

Players may fund their accounts using the payment methods available on the platform. Deposited funds are credited to the player's gaming account upon successful authorization and confirmation of the transaction by the relevant payment provider.

Minimum and maximum deposit, wagering, and withdrawal limits are established by the Company and may vary depending on the payment method, game provider requirements, player account status, risk management considerations, and responsible gaming controls. Applicable limits are displayed to players through the platform interface where relevant.

All wagers are recorded electronically within the Company's gaming system at the time of placement. Upon completion of a gaming event, game round, betting market, or other wagering activity, the outcome is determined by the applicable game or betting system and automatically communicated to the Company's platform for settlement.

Winning amounts are calculated automatically based on the applicable game rules, paytables, jackpot conditions, odds, or settlement procedures. Following settlement, winnings are credited directly to the player's account balance and become available for

further wagering or withdrawal, subject to applicable verification, compliance, and risk management procedures.

Withdrawal requests are processed in accordance with the Company's internal procedures, Anti-Money Laundering (AML) requirements, Know Your Customer (KYC) obligations, fraud prevention controls, and applicable regulatory requirements. The Company reserves the right to request additional verification information before approving withdrawals where required.

All financial transactions, including deposits, wagers, winnings, bonuses, adjustments, refunds, and withdrawals, are recorded and retained within the Company's systems to ensure accurate accounting, auditability, dispute resolution, and regulatory compliance.

2.3. Software and outcome-determining elements

The Company operates as a licensed B2C online gaming operator and provides access to gaming products supplied by licensed and regulated third-party gaming providers.

The determination of game outcomes is performed exclusively by the respective gaming software and underlying gaming systems operated by the approved providers. The Company does not alter, influence, manipulate, or interfere with game outcomes, payout calculations, Random Number Generator (RNG) processes, jackpot triggers, sporting event results, or any other outcome-determining mechanisms.

Depending on the nature of the gaming product, outcomes may be generated through:

- Certified Random Number Generators (RNGs);
- Live gaming systems and live dealer platforms;
- Progressive jackpot engines;
- Sporting event results and betting settlement systems;
- Other approved outcome-generation technologies implemented by licensed providers.

All gaming software integrated into the platform is sourced from reputable providers that hold the required licenses, approvals, certifications, or regulatory authorizations in the jurisdictions in which they operate. Where applicable, gaming systems are independently tested and certified by recognized testing laboratories to verify fairness, integrity, and compliance with industry standards.

The Company maintains technical integrations that securely transmit player wagers, game requests, outcomes, settlements, and related transactional data between the platform and the respective gaming providers. All gaming transactions are automatically recorded and retained within the Company's systems for audit, compliance, regulatory reporting, and dispute-resolution purposes.

The platform maintains comprehensive controls to ensure the integrity of gaming operations, including:

- Secure communication channels and encrypted data transmission;
- Access control and authentication mechanisms;
- Continuous monitoring of gaming transactions;

- Automated transaction logging and audit trails;
- Incident management and security monitoring procedures;
- Backup, disaster recovery, and business continuity measures.

Game rules, betting limits, payout structures, RTP information (where applicable), and jackpot conditions are defined by the respective game providers and are made available to players through the gaming interface or related informational sections of the platform. The Company performs due diligence and ongoing monitoring of its gaming suppliers to ensure that all integrated gaming content remains compliant with applicable regulatory, licensing, responsible gaming, anti-money laundering, and technical requirements.

3. Quality monitoring and testing

3.1. RNG certification and accredited testing laboratories (ATLs)

The Company only offers gaming content supplied by approved gaming providers whose games and Random Number Generator (RNG) systems have been independently tested and certified by recognized Accredited Testing Laboratories (ATLs), including, but not limited to, Gaming Laboratories International (GLI), iTech Labs, eCOGRA, BMM Testlabs, or other recognized certification bodies.

3.2. Periodic vulnerability and penetration testing

The Company implements ongoing security monitoring and testing procedures to protect its systems, infrastructure, and player data.

Periodic vulnerability assessments and penetration tests are performed either by qualified internal personnel or independent external security specialists. These assessments are designed to identify, evaluate, and remediate potential security weaknesses within the Company's information systems, networks, applications, and supporting infrastructure.

Any identified vulnerabilities are documented, risk-assessed, and addressed according to the Company's information security and incident management procedures.

4. Data protection and storage

The Company maintains a dedicated Privacy Policy that sets out in detail the categories of personal data collected, the purposes of processing, data subject rights, data retention practices, international data transfers, use of cookies, and other data protection matters.

The Privacy Policy is made available to customers through the Company's websites and forms an integral part of the Company's data protection framework. The Company reviews and updates its Privacy Policy periodically to ensure continued compliance with applicable legal, regulatory, and operational requirements.

4.1. Data protection

The Company is committed to protecting the confidentiality, integrity, and availability of personal and operational data processed.

Personal data is collected and processed only for legitimate business and regulatory purposes, including account administration, identity verification, payment processing, responsible gaming controls, anti-money laundering compliance, fraud prevention, customer support, and regulatory reporting.

Access to personal data is restricted to authorized personnel based on business need and role-based access controls. Employees and service providers with access to confidential information are subject to appropriate confidentiality obligations.

The Company implements technical and organizational security measures designed to protect information against unauthorized access, disclosure, alteration, loss, misuse, or destruction. Such measures include, where appropriate:

- Secure authentication and access controls;
- Encryption of data during transmission;
- Network and infrastructure security controls;
- System monitoring and logging;
- Regular security reviews and vulnerability assessments;
- Incident management and response procedures.

4.2. Data storage and retention

The Company maintains secure electronic records of customer accounts, gaming activity, financial transactions, KYC documentation, AML records, and operational logs.

Data is stored on secure systems operated by the Company and/or approved third-party service providers. Appropriate safeguards are implemented to ensure data integrity, availability, and protection against unauthorized access.

Customer and transaction records are retained in accordance with applicable legal, regulatory, anti-money laundering, and licensing requirements. Unless a longer retention period is required by law or regulatory authority, relevant customer identification and transaction records are retained for a minimum period of 5 (five) years following the end of the business relationship or completion of the relevant transaction.

Upon expiration of the applicable retention period, data is securely deleted, anonymized, or archived in accordance with the Company's internal data retention procedures and legal obligations.

4.3. Data breach and incident management

The Company maintains procedures for identifying, investigating, managing, and documenting information security incidents and potential data breaches.

Where required by applicable laws or regulatory obligations, relevant authorities and affected individuals will be notified within the prescribed timeframes. Corrective actions are implemented to mitigate risks and prevent recurrence of similar incidents.

5. Visual interface specifications

5.1. Website UI/UX standards mandatory CGA trust seals

The website interface strictly incorporates mandatory visual trust markers: the official dynamic seal issued by the Curaçao Gaming Authority (CGA), underage gambling prohibition warning icons ("18+ Only"), and direct links to the Responsible Gaming Policy page.

5.2. Persistent In-Game session and balance indicators

During active game sessions, the graphical user interface ensures complete informational disclosure, maintaining real-time visibility over the player's active currency balance, active bonus configurations, and total elapsed session time clocks.

6. Access control and banned persons exclusion

6.1. GeoIP geolocation blocks and restricted jurisdictions

To prevent access by persons located in prohibited or restricted jurisdictions, the Company utilizes a combination of geolocation, IP address detection, device intelligence, payment screening, KYC verification, and risk-monitoring controls.

The Company uses GeoIP technology and other location verification tools to identify the geographical location of users at the time of registration, login, and gameplay. Access to the platform may be restricted, blocked, or suspended where a user is identified as residing in, accessing the platform from, or otherwise connected to a jurisdiction in which the Company's services are prohibited, restricted, sanctioned, or otherwise unavailable.

In addition to geolocation controls, the Company performs customer due diligence and verification procedures to identify the customer's country of residence and to ensure compliance with applicable licensing, regulatory, sanctions, and anti-money laundering requirements.

The Company maintains a list of prohibited and restricted jurisdictions based on applicable licensing requirements, legal restrictions, sanctions obligations, and internal risk assessments. This list is reviewed periodically and updated when necessary.

Customers from prohibited jurisdictions are not permitted to register, deposit, wager, or otherwise access the Company's gaming services. Any attempt to circumvent geographical restrictions through VPNs, proxies, anonymization services, false information, or other means may result in account suspension, account closure, confiscation of winnings where permitted by applicable law, and any other measures deemed necessary by the Company to ensure regulatory compliance.

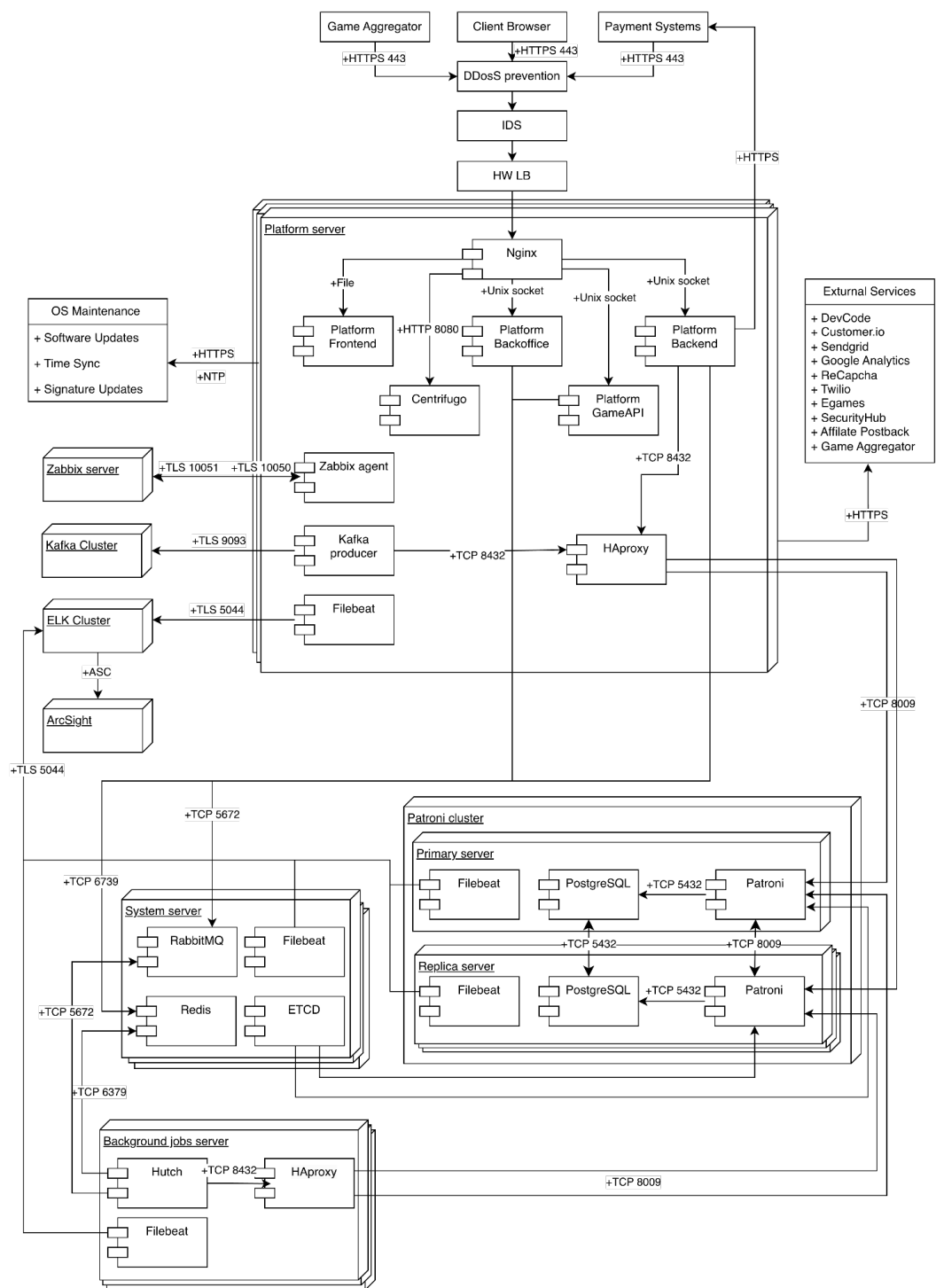
7. Technical infrastructure and disaster recovery

7.1. High availability architecture

Disasters prevented by high availability (HA) architecture usage which is realised by two layers:

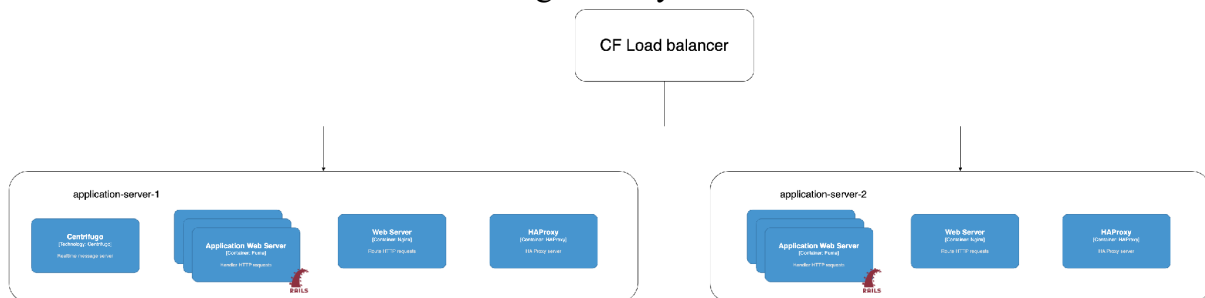
- Application layer
- Database layer

Simplified infrastructure configuration is shown in the picture below.



Application layer

The application is deployed on several platform servers combined into the Cloudflare Load Balancer pool. Cloudflare performs a health check on each server and automatically excludes unavailable nodes from rotation. If one or two servers fail, traffic is redirected to the remaining healthy nodes without manual intervention.



Database layer

The Patroni failover cluster (PostgreSQL) is used for the database. The cluster consists of a primary node and a replica node with synchronous/asynchronous replication. If primary is unavailable, Patroni automatically promotes one of the replicas to a new primary (automatic failover), ensuring minimal database downtime.



7.2. Backup policy

Type and frequency of backups

Backups are organized via filesystem snapshots, which does not affect the performance of the database and allows to make backups of large databases. The backups consist of a monthly full backup, weekly differential backups (between the current date and full backup), and nightly incremental backup (between the current date and last incremental backup) which will allow a point in time recovery of database state since last full backup. Our monitoring system (Zabbix) will notify us if backup fails.

Backups schedule (The start time of the procedure is indicated for all casinos; the actual time may differ):

- full: every 1st Saturday at 01:00
- differential: 2nd-5th Saturday at 01:00
- incremental: Monday – Friday at 01:00

The restore process consists of compiling a list of required backups (full + differential + incremental) by the particular date and the restore process to the target server itself.

Restore checks

One of our internal policies is that although we always make sure that we have the best backup solutions in place; it is of utmost importance that we perform restore checks every now and then to make sure that the data restored is consistent. Although a backup job may show as successful it is not always the case that the data itself is valid. Therefore, for these reasons we do various restore checks depending on the type of data to make sure that should we ever need to restore data from a previous backup we would be able to do so without any problems. However, the IT department will perform at least an annual dedicated test to ensure that backups are complete and functional. The results will be logged so that we can refer to them as necessary. The reason could be both for a license or legal requirements and even due to internal requirements.

8. Responsible gaming policy

The Company operates under a Responsible Gaming Policy in compliance with regulatory standards. The Responsible Gaming Policy forms part of the Company's overall compliance framework and has been submitted to the Curaçao Gaming Authority (CGA) as part of the Company's licensing and regulatory compliance documentation. A summary of the key responsible gaming measures implemented by the Company is provided below:

8.1. Underage gambling prevention (Zero Tolerance)

Age Limit: Gambling is strictly prohibited for anyone under the age of 18.

Verification: Customer identity and age must be verified using valid documents (ID card, passport, or driver's license) during registration. AI checks or third-party databases may also be used.

Action Protocol: If a player is found to be underage, the account must be immediately suspended and permanently closed. All winnings are automatically forfeited. Deposits must be fully refunded within two business days, unless frozen due to AML or fraud investigations. A detailed report must be sent to the regulatory authority within 5 working days.

8.2. Player protection tools and limits

Players have direct access to automated tools on the platform to control their behavior. Support agents must know how these limits function:

- Deposit Limits: Players can cap their deposits on a daily, weekly, or monthly basis.
- Wagering Limits: Caps on the total amount bet per period. Note that wagering limits do not apply to sports betting.
- Loss Limits: Caps on the maximum amount a player can lose. Once reached, further gameplay is blocked until the period resets. This tool does not apply to sports betting.
- Session Time Limits: Caps on the duration of a single gaming session to ensure regular breaks. This tool does not apply to sports betting.
- Limit Changes: Any request to decrease a limit must take effect immediately. Any request to increase or remove a limit is subject to a mandatory 7-day waiting period.

8.3. Cooling-Off and Self-Exclusion

- Cooling-Off (Short-Term Break): Players can take a temporary break for 1 day, 3 days, 1 week, 1 month, 3 months, or 6 months. This action is immediate and requires no approval. It blocks deposits, gameplay, and excludes the user from all marketing communications.
- Self-Exclusion (Long-Term/Permanent): Players can voluntarily block themselves for 1 year, 3 years, or permanently. This block applies across all brands and domains operated by the Company, covering both casino and sports betting. Support must ensure that all duplicate accounts and known payment methods are blocked to prevent circumvention.
- Breach Protocol: If a self-excluded individual manages to access the platform, the account must be blocked immediately, deposits refunded within two business days, and the incident reported to the authority within 5 working days.
- Reactivation: An account can only be reactivated after the chosen self-exclusion period has fully expired. The player must submit a formal written request, acknowledge responsible gaming reminders, and complete a mandatory self-assessment questionnaire.

8.4. Behavior monitoring and chat assessment

The Company utilizes behavioral tracking to spot early warning signs of problem gambling. If a support agent detects concerning verbal triggers or distress during a chat session, they must ask the player the evaluation questions:

- Have you ever gambled to get money to pay debts?
- Has your gambling made you careless about the welfare of yourself or your family?
- Have you ever borrowed money or sold anything to gamble?
- Has your gambling ever caused you any health problems?
- Have you ever felt extremely guilty after finishing a gambling session?
- Have you ever felt you might have a problem with gambling?

Based on the player's answers, the agent must guide them toward available platform tools or direct them to professional support organizations.

8.5. Marketing restrictions and data audit

- **Prohibited Practices:** Marketing materials must never make misleading claims about winning, suggest gambling as a financial solution, or target self-excluded and financially vulnerable individuals. High-risk casino games must not be marketed to anyone under the age of 25.
- **Data Retention:** To comply with potential regulatory audits, complete records of all exclusions, age verifications, and support interventions must be securely stored for a period of 7 years.

9. General terms and conditions

The Company maintains a Terms and Conditions document governing the use of its websites and gaming services, including customer eligibility, account registration, deposits and withdrawals, bonuses and promotions, responsible gaming requirements, prohibited activities, account suspension and closure, and dispute resolution procedures.

The Terms and Conditions are publicly available on each licensed website operated by the Company and must be accepted by customers during the registration process before access to gaming services is granted.

The Company reviews and updates the Terms and Conditions as necessary to reflect changes in its services, business operations, and applicable legal requirements. The latest version of the Terms and Conditions is made available to customers at all times through the relevant website.

The Terms and Conditions form a legally binding agreement between the Company and its customers.

10. Player dispute resolution framework

The Company maintains a Player Complaints and Dispute Resolution Policy which establishes the procedures for the submission, handling, investigation, and resolution of customer complaints and disputes.

The policy forms part of the Company's compliance framework and has been provided to the Curaçao Gaming Authority (CGA).

10.1. Introduction and regulatory framework

This section outlines the detailed procedures for receiving, processing, and resolving player complaints by Just Entertainment B.V. This framework has been developed in strict accordance with Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, LOK). The provisions detailed herein apply to all complaints received from players regarding their interactions with the Company and any aspect of their participation in the games of chance offered.

10.2. Definition of a complaint (Incident)

A complaint (incident) is defined as any event, action, omission, or system behavior that, in the opinion of the player, has negatively impacted their participation in a game of chance or their relationship with the Company. The scope of reasons for lodging an official complaint includes, but is not limited to:

- Issues with deposits, withdrawals, or transaction failures;
- Disputes over bonuses, specific game results, or bet settlements;
- Account suspensions, closures, or administrative restrictions;
- Technical errors, performance drops, or platform bugs.

10.3. Procedure for complaints (Incidents) and operational timelines

1. **Submission Channels:** Players may submit complaints completely free of charge. Complaints can be formally lodged via the following integrated communication channels:
 - Live Chat: Interactive chat assistance available 24/7 directly on the website.
 - Email: Transmitted directly to the customer support team.
2. **Acknowledgement of a Complaint:** The Company acknowledges receipt of the complaint immediately upon transmission. The player is automatically provided with a unique ticket reference number for tracking purposes.
3. **Resolution and Decision Timelines:**
 - **First Response:** The Company provides a substantial first response or resolution update within 72 hours from the formal submission of the complaint.
 - **Final Decision:** A definitive final decision is made and officially communicated to the player within 10 business days from the initial submission.
 - **Technical Extensions:** In exceptional cases requiring detailed investigations (e.g., involving third-party game providers or complex technical/financial system audits), the resolution period may be extended by 4 additional weeks, subject to prior written notice delivered to the player. The final response shall include a comprehensive explanation and outcome, or a detailed justification for declining the complaint.

4. **Responsible Gaming Complaints:** Responsible Gaming complaints are handled with the highest operational priority. The Company ensures the most timely and specialized resolution of such complaints in strict accordance with corporate responsible gambling practices.

10.4. Alternative Dispute Resolution (ADR)

If the complaint is not resolved to the player's satisfaction through the internal procedures, it may be escalated to a certified ADR provider. The Company commits to concluding a formal agreement with certified ADR entities as soon as the official register of certified ADR providers appears. This mediation service is free of charge for the player. ADR contact details are included in the General Terms and Conditions and are prominently displayed on the platform's website.

10.5. Escalation to the Curaçao Gaming Authority (CGA)

Players who believe the Company has breached its explicit regulatory obligations under the LOK framework may report the matter via the CGA's official Online Form. The Company acknowledges that the CGA acts as a supervisory body and will not resolve or make decisions on complaints regarding individual gambling-related transactions.

10.6. Record-Keeping and Bi-Annual Regulatory Reporting

Data Retention: All complaints, communication histories, log exports, and internal summaries are logged and securely stored by the Company for a minimum period of 5 years.

Bi-Annual Reporting Obligations: Comprehensive compliance reports are compiled and submitted by the Company twice annually (strictly on January 15 and June 15) to the CGA, containing:

1. The total number of complaints made during the reporting period;
2. The total number of complaints closed (subdivided into settled and rejected cases);
3. The exact number of pending or unresolved complaints;
4. The distribution of complaints sorted by core operational categories;
5. The number of disputes referred to ADR bodies along with the subsequent outcomes of each;
6. The exact number and details of complaints for which a player has taken external legal action against the licensee.

11. Digital record and local server

Pursuant to Article 5.1 of the National Ordinance, Just Entertainment B.V. maintains a secure, continuous replication channel that mirrors critical cloud data assets down to its physical, local technical hardware vault.

The local technical deployment is hosted inside a Tier-IV certified data center physically operating in Curaçao. The replicated data structure inside the local vault encompasses critical player master data (Sumsud KYC logs), gaming audit trails (every individual bet, transaction timestamp, and RNG outcome), and complete financial ledgers (deposits, cash-out executions, and transaction hashes). This infrastructure grants the CGA instant read-only capabilities to monitor and verify operational compliance at any time.

Version control:

1.0. last updated - 30.06.2026