

OPERATIONS MANUAL

Gareton B.V.

Version: 1.0

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1. Introduction

Gareton B.V., a company incorporated in Curaçao under registration number 160656 and holder of Curaçao B2C Online Gaming Licence No. OG/2024/165/0185 (the "Company"), is duly licensed and authorized to conduct remote games of chance in accordance with the applicable laws and regulations of Curaçao.

The Company operates online gaming websites and related domains approved under its Curaçao B2C Online Gaming Licence and provides gaming services to customers in accordance with the applicable licensing framework.

This Operations Manual has been prepared pursuant to Article 5.9 of the National Ordinance for Games of Chance (LOK) and describes the Company's operational structure, governance framework, internal controls, technical infrastructure, and compliance measures applicable to its licensed gaming activities.

The purpose of this Manual is to establish the operational standards, internal procedures, and regulatory controls implemented by the Company to ensure the integrity, security, transparency, and lawful operation of its gaming business.

2. Games and software description

2.1. Gaming Portfolio

The Company offers a broad portfolio of online gaming products supplied by licensed and appropriately authorised third-party gaming providers. The available gaming content may change from time to time depending on commercial arrangements, supplier integrations, regulatory requirements, and operational considerations.

The Company's gaming portfolio includes, but is not limited to, the following categories:

Slot Games

Digital reel-based games in which game outcomes are generated through certified Random Number Generator ("RNG") technology or other approved randomisation mechanisms implemented by the relevant gaming provider.

Table Games

Online versions of traditional casino games, including blackjack, roulette, baccarat, poker variants, dice games and similar products. Outcomes are determined through certified RNG systems or other approved game-specific mechanisms.

Live Casino Games

Games conducted in real time by live dealers and streamed from licensed gaming studios. Game outcomes are determined through physical gaming equipment, live dealer procedures and associated verification technologies. Instant Win and Original Games

A variety of proprietary and third-party online games, including crash games, dice games, plinko-style games, wheel games and other interactive products. Depending on the nature of the game, outcomes may be generated through certified RNG systems, provably fair

technology, cryptographic verification methods or other approved outcome-generation mechanisms.

Jackpot Games

Gaming products linked to standalone or progressive jackpot systems where eligible wagers contribute to a shared prize pool. Jackpot accumulation, triggering conditions and prize distribution are managed automatically by the relevant gaming software.

Sports Betting and Virtual Sports

Sports betting products enable players to place wagers on real sporting events and virtual sporting events. Settlement is based upon official event results, authorised data feeds or approved settlement procedures supplied by recognised service providers.

2.2. Payment possibilities, bets, and payout mechanics

The Company offers a range of payment methods through licensed payment institutions, banking partners, electronic payment service providers and cryptocurrency payment processors, subject to availability within the customer's jurisdiction.

Customers may fund their gaming accounts using any payment method available on the platform. Funds are credited only after successful authorisation and confirmation by the relevant payment provider.

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

Minimum and maximum limits applicable to deposits, wagers and withdrawals are established by the Company and may differ depending on the selected payment method, gaming product, player risk profile, responsible gaming settings and operational requirements. Where applicable, such limits are displayed through the platform interface.

All wagers are electronically recorded within the Company's gaming systems immediately upon placement. Once a game round, betting market or other wagering event has concluded, the applicable gaming or betting system automatically determines the outcome and communicates the settlement result to the Company's platform.

Winning amounts are calculated automatically in accordance with the applicable game rules, payout tables, jackpot mechanics, betting odds or settlement procedures. Following settlement, winnings are credited directly to the player's account and become available for further wagering or withdrawal, subject to applicable verification, AML, KYC and fraud prevention procedures.

Withdrawal requests are processed in accordance with the Company's internal operational procedures, Anti-Money Laundering requirements, Know Your Customer obligations, fraud prevention measures and other applicable legal and regulatory requirements. Where appropriate, the Company may request additional information or documentation before authorising a withdrawal.

All financial transactions, including deposits, wagers, winnings, bonuses, refunds, manual adjustments and withdrawals, are securely recorded and retained to ensure accurate accounting, regulatory compliance, auditability and effective dispute resolution.

2.3. Software and outcome-determining elements

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

The Company does not influence, modify, manipulate or interfere with game outcomes, payout calculations, Random Number Generator processes, jackpot mechanisms, sporting event results or any other outcome-determining systems.

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

- certified Random Number Generators (RNGs);
- live dealer gaming systems;
- progressive jackpot engines;
- official sporting event results and betting settlement systems; or
- other approved outcome-generation technologies implemented by licensed suppliers.

Only gaming software supplied by appropriately licensed and certified providers is integrated into the Company's platform. Where required, gaming systems are independently tested and certified by recognised testing laboratories to verify fairness, integrity and compliance with applicable technical standards.

The Company maintains secure technical integrations that facilitate the transmission of wagers, gaming requests, game outcomes, settlements and related transactional data between the platform and each gaming provider. All gaming transactions are automatically logged and retained for regulatory reporting, audit purposes, compliance monitoring and dispute resolution.

To maintain the integrity and security of gaming operations, the Company implements a range of technical and organisational controls, including secure communication channels, encrypted data transmission, role-based access controls, continuous transaction monitoring, automated audit logging, incident management procedures, backup systems and business continuity measures.

Game rules, betting limits, RTP information (where applicable), payout structures and jackpot conditions are determined by the relevant gaming providers and are made available to players through the gaming interface or accompanying informational materials.

The Company performs initial due diligence and ongoing monitoring of all gaming suppliers to ensure continued compliance with applicable licensing requirements, technical standards, responsible gaming obligations, anti-money laundering legislation and other regulatory requirements.

3. Quality monitoring and testing

3.1. RNG certification and accredited testing laboratories (ATLs)

The Company offers only gaming content supplied by licensed and approved gaming providers whose gaming systems and Random Number Generators (RNGs) have been independently tested, certified and approved by internationally recognised Accredited Testing Laboratories ("ATLs"), including, where applicable, Gaming Laboratories International (GLI), iTech Labs, eCOGRA, BMM Testlabs or other recognised independent certification bodies.

Where certification is required by applicable regulatory requirements, the Company ensures that integrated gaming content remains supported by valid certifications demonstrating fairness, integrity, reliability and compliance with applicable technical standards.

The Company conducts ongoing monitoring of its gaming suppliers to verify that all integrated gaming products continue to satisfy applicable licensing, certification and regulatory requirements throughout their lifecycle.

3.2. Periodic vulnerability and penetration testing

The Company maintains an information security programme designed to safeguard its technology infrastructure, gaming platform and information assets against internal and external security threats.

Security assessments, including vulnerability scanning and penetration testing, are performed periodically by appropriately qualified internal personnel and/or independent external security specialists, depending on the nature of the systems being assessed.

These assessments are intended to identify, evaluate and remediate technical vulnerabilities affecting the Company's applications, infrastructure, databases, network components and supporting systems.

All identified vulnerabilities are documented, assigned an appropriate risk classification and remediated in accordance with the Company's information security policies and incident management procedures. Where necessary, corrective actions are verified through follow-up testing to ensure effective remediation.

The Company reviews its security testing programme on a regular basis to ensure continued effectiveness and alignment with applicable regulatory, operational and industry standards.

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 Company ensures that each licensed website complies with the visual interface requirements established by the Curaçao Gaming Authority and applicable regulatory standards.

Each website prominently displays all mandatory regulatory notices and trust indicators, including, where applicable:

- the official dynamic Curaçao Gaming Authority trust seal;
- the mandatory "18+ Only" underage gambling warning;
- clear access to the Responsible Gaming Policy;
- links to the Company's Terms and Conditions and Privacy Policy; and
- any additional regulatory disclosures required under applicable legislation.

The Company periodically reviews its websites to ensure that all mandatory regulatory information remains accurate, visible and fully accessible to players.

5.2. Persistent In-Game session and balance indicators

Throughout every active gaming session, the platform provides players with continuous access to key account and gameplay information.

The gaming interface displays, where applicable:

- the player's current account balance;
- active bonus balances and wagering progress;
- the currency used for gameplay;
- the duration of the current gaming session; and
- other information necessary to enable players to make informed gaming decisions.

The Company ensures that such information remains available throughout gameplay in order to promote transparency, responsible gaming and compliance with applicable regulatory requirements.

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

The Company's technical infrastructure is designed to provide a resilient, highly available and fault-tolerant operating environment that supports the continuous delivery of gaming services.

To minimise operational disruption and reduce the risk of service interruption, the Company maintains a high availability ("HA") architecture comprising separate application and database layers.

The high availability environment is designed to ensure continuity of service in the event of hardware failures, software malfunctions, infrastructure outages or other operational incidents.

Application layer

The application environment operates across multiple application servers configured within a Cloudflare Load Balancer pool.

Cloudflare continuously performs automated health monitoring of each application node. Where a server becomes unavailable or fails to satisfy predefined health criteria, traffic is automatically redirected to healthy nodes without requiring manual intervention.

This architecture enables uninterrupted service delivery even where one or more application servers become unavailable.

Database layer

The Company utilises a Patroni-managed PostgreSQL cluster to provide database redundancy and automated failover capabilities.

The database environment consists of a primary database node together with one or more replica nodes using synchronous and/or asynchronous replication.

Where the primary database becomes unavailable, Patroni automatically promotes an available replica to primary status, thereby minimising service disruption and preserving data availability.

The Company continuously monitors database performance, replication status and failover readiness as part of its operational monitoring programme.

7.2. Backup policy

Type and frequency of backups

The Company maintains a comprehensive backup programme designed to ensure the integrity, availability and recoverability of critical operational and customer data.

Backups are performed using filesystem snapshot technology, allowing large databases to be backed up efficiently without materially affecting system performance.

The backup strategy includes:

- monthly full backups;
- weekly differential backups; and
- daily incremental backups,

thereby enabling point-in-time recovery where necessary.

The Company's monitoring systems continuously supervise the backup process and generate automated alerts in the event of any backup failure or irregularity.

The standard backup schedule is as follows:

- Full backup – first Saturday of each month;
- Differential backup – each subsequent Saturday of the month;
- Incremental backup – Monday through Friday.

Operational schedules may be adjusted where necessary without affecting the Company's backup and recovery objectives.

Restore checks

The Company recognises that successful completion of a backup does not, by itself, guarantee successful recovery.

Accordingly, the Company performs periodic restoration testing to verify the integrity, completeness and usability of backup data.

Restore testing includes verification of database consistency, application functionality and recoverability of critical operational information.

In addition to periodic operational testing, the IT Department performs at least one formal disaster recovery restoration test each calendar year.

The results of all restoration exercises are documented and retained for internal governance, regulatory inspection and audit purposes.

8. Responsible gaming policy

The Company is committed to promoting responsible gambling and maintaining a safe, fair and transparent gaming environment for all customers.

Responsible Gaming forms an integral part of the Company's compliance framework and operational governance. The Company has adopted and implemented a Responsible Gaming Policy in accordance with the requirements of the National Ordinance for Games of Chance (LOK), applicable regulatory guidance and industry best practices.

The Responsible Gaming Policy establishes the procedures, controls and protective measures designed to minimise gambling-related harm, prevent underage gambling, identify vulnerable customers and promote informed gambling behaviour.

The principal elements of the Company's Responsible Gaming framework are summarised below.

8.1. Underage gambling prevention (Zero Tolerance)

The Company maintains a zero-tolerance approach towards underage gambling.

Participation in the Company's gaming services is strictly limited to individuals who have reached the minimum legal gambling age applicable under the Company's licence and the relevant legal framework.

The Company implements customer identification and age verification procedures before permitting customers to access gaming services. Verification may include documentary checks, automated verification technologies and the use of independent third-party verification providers.

Where the Company determines that a customer is under the legal gambling age, the account shall be immediately suspended and permanently closed.

Any winnings obtained by an underage customer shall be treated in accordance with applicable legislation and the Company's regulatory obligations. Deposited funds shall be returned where required by applicable law and where such return does not conflict with anti-money laundering, fraud prevention or other legal requirements.

Where required by applicable legislation or regulatory guidance, the Company shall notify the relevant supervisory authority of confirmed cases of underage gambling within the prescribed reporting period.

8.2. Player protection tools and limits

The Company provides customers with a range of responsible gaming tools enabling them to control their gambling activity and manage their level of participation.

Available responsible gaming controls include, where applicable:

- deposit limits;
- wagering limits;
- loss limits;
- session duration limits; and
- other responsible gaming measures made available through the platform.

Customers may establish or reduce their limits at any time through their player account.

Requests to reduce existing limits take effect immediately.

Requests to increase or remove previously established limits become effective only after the expiry of the mandatory cooling-off period prescribed by applicable law or the Company's Responsible Gaming Policy.

The availability of particular responsible gaming tools may vary depending on the gaming product, applicable regulatory requirements and operational considerations.

8.3. Cooling-Off and Self-Exclusion

The Company provides customers with the ability to voluntarily suspend or restrict access to their gaming accounts through Cooling-Off and Self-Exclusion mechanisms.

Cooling-Off enables customers to suspend access to gaming services for predetermined temporary periods. During an active Cooling-Off period, customers are prevented from depositing funds, participating in games or receiving promotional communications.

Customers may also request Self-Exclusion for longer or permanent periods.

During an active Self-Exclusion period, customer accounts remain inaccessible for gaming purposes and the Company applies reasonable technical and operational measures designed to prevent the customer from circumventing the restriction, including monitoring duplicate accounts and associated payment methods where appropriate.

Where the Company becomes aware that a self-excluded customer has accessed the platform, appropriate measures shall be taken without undue delay, including suspension of the account, implementation of applicable refund procedures where required and notification of the competent authority where such notification is mandated by applicable law.

Accounts subject to Self-Exclusion may only be reactivated following expiry of the selected exclusion period and completion of any reactivation procedures established by the Company and applicable regulatory requirements.

8.4. Behavior monitoring and chat assessment

The Company maintains procedures for monitoring customer behaviour in order to identify indicators of potential gambling-related harm.

Behavioural monitoring may include analysis of gambling patterns, transactional activity, customer interactions and other risk indicators available to the Company.

Where customer support personnel identify behaviours that may indicate gambling-related harm or vulnerability, they shall engage with the customer in accordance with the Company's Responsible Gaming procedures.

Support personnel may encourage customers to utilise available responsible gaming tools, temporarily suspend gaming activity, or seek assistance from recognised responsible gambling organisations where appropriate.

Where necessary, enhanced responsible gaming measures may be applied following an internal assessment conducted in accordance with the Company's Responsible Gaming Policy.

8.5. Marketing restrictions and data audit

The Company ensures that all marketing communications are prepared and distributed in accordance with applicable legal, regulatory and responsible gaming requirements.

Marketing materials shall not:

- target individuals below the legal gambling age;
- target self-excluded customers;
- encourage excessive or irresponsible gambling behaviour;
- portray gambling as a solution to financial difficulties;
- misrepresent the likelihood of winning or the risks associated with gambling.

Where required by applicable legislation or internal policy, additional marketing restrictions may apply to higher-risk gaming products or specific customer categories.

The Company maintains records relating to responsible gaming interventions, customer protection measures, age verification procedures, self-exclusion requests and other responsible gaming activities for the retention periods prescribed by applicable legislation and regulatory requirements.

All responsible gaming records are stored securely and remain available for internal review, regulatory inspection and compliance reporting where required.

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.

9. General terms and conditions

The Company maintains comprehensive Terms and Conditions governing the use of its gaming platform, websites and related services.

The Terms and Conditions establish the contractual relationship between the Company and its customers and set out the respective rights, obligations and responsibilities of both parties.

The Terms and Conditions address, among other matters:

- customer eligibility and account registration;
- customer identification and verification requirements;
- deposits, withdrawals and payment processing;
- bonuses, promotions and wagering requirements;
- responsible gaming obligations;
- prohibited activities and fraudulent conduct;
- account suspension, restriction and termination;
- complaint handling and dispute resolution; and
- any other matters necessary for the proper operation of the Company's gaming services.

Customers are required to review and expressly accept the applicable Terms and Conditions before accessing or using the Company's gaming services.

The Company periodically reviews and updates the Terms and Conditions to ensure continued compliance with applicable legal, regulatory and operational requirements. The most recent version is published on each licensed website and remains readily accessible to customers at all times.

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.

10.1. Introduction and regulatory framework

The Company is committed to providing customers with an accessible, transparent and effective complaints handling process. All complaints are managed in accordance with the Company's internal procedures and applicable legal and regulatory requirements.

10.2. Definition of a complaint (Incident)

A complaint (or incident) means any expression of dissatisfaction submitted by a customer in relation to the Company's gaming services, customer account, transactions or any other aspect of the customer relationship.

10.3. Procedure for complaints (Incidents) and operational timelines

Customers may submit complaints through the communication channels made available on the Company's website, including email and live chat.

Each complaint is recorded, acknowledged, investigated and resolved in accordance with the Company's internal complaints handling procedures. The Company aims to provide an initial response without undue delay and to resolve complaints within the timeframes established by its internal policies and applicable regulatory requirements.

Where additional investigation is required, the customer will be informed accordingly.

10.4. Alternative Dispute Resolution (ADR)

Where a complaint cannot be resolved through the Company's internal complaints procedure, the customer may refer the matter to the Company's appointed Alternative Dispute Resolution (ADR) provider, where applicable.

Information regarding the ADR procedure is available on the Company's website and in the Terms and Conditions.

10.5. Escalation to the Curaçao Gaming Authority (CGA)

Customers may submit complaints or regulatory concerns to the Curaçao Gaming Authority where permitted under applicable law. The Company shall cooperate with the Authority in relation to any regulatory enquiries or investigations.

10.6. Record-Keeping and Regulatory Reporting

The Company maintains records of customer complaints, investigations and resolutions in accordance with applicable legal and regulatory requirements. Complaint records are retained for the required retention period and made available to competent authorities upon lawful request.

11. Digital record and local server

Pursuant to Article 5.1 of the National Ordinance for Games of Chance (LOK), Scores55 Tech B.V. maintains a secure, continuously synchronised local server infrastructure in Curaçao for the storage and replication of regulatory and operational data.

The local infrastructure is hosted within a Tier IV certified data centre physically located in Curaçao and consists of a dedicated Linux-based physical server configured as a secure replication and archival server. The server continuously receives replicated operational data from the Company's production cloud environment through encrypted communication channels.

The replicated data includes, where applicable:

- customer master records and KYC documentation (including Sumsb verification records);
- gaming transaction logs, including individual bets, timestamps and game outcomes;
- financial records, including deposits, withdrawals, account adjustments and transaction histories;
- audit logs and operational system events; and
- such other records as may be required under applicable law or regulatory requirements.

The local server is protected by appropriate physical, logical and organisational security controls, including restricted administrative access, encryption, continuous monitoring, backup procedures and disaster recovery measures.

The infrastructure enables the Curaçao Gaming Authority (CGA), where permitted by applicable law, to obtain read-only access to regulatory records and operational information for the purposes of regulatory supervision, inspection and compliance verification.

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