

Mibs N.V.

Operational Manual

1. Purpose

This manual sets out the required operational, compliance, AML/CFT, security, and responsible gaming procedures to meet regulatory obligations. It applies to all employees, contractors, and service providers involved in the company's gaming operations.

2. Core Responsibilities

Management

- Approves policies and ensures regulatory compliance.

Compliance

- Oversees KYC, AML/CFT, reporting, responsible gaming, and communication with regulators.

Operations

- Manages daily platform activities and supplier coordination.

Marketing & Affiliates

- Ensures compliant promotions and monitors affiliates.

Customer Support

- Assists players and escalates compliance-related issues.

IT/Security

- Maintains platform infrastructure, security, and incident response.

Finance

- Manages payment processing and transaction monitoring.

3. Key Operating Procedures

3.1 KYC

- Collect required identification before withdrawals or when risk triggers occur.
- Conduct EDD for high-risk cases.
- Suspend accounts when verification fails.

3.2 Payments

- Use approved payment providers.
- Review withdrawals for KYC completion and AML/CFT concerns.
- Monitor for fraud indicators.

3.3 Gaming Operations

- Use only approved and certified game suppliers.
- Monitor performance and document incidents.

3.4 Marketing & Affiliates

- Compliance approval required for all materials.
- Affiliates must be screened and monitored.

3.5 Customer Support

- Verify identity before discussing account matters.
- Escalate disputes according to internal procedure.

4. Responsible Gaming

- Provide deposit limits, self-exclusion, and responsible gaming information.
- Monitor for risky behavior and intervene when necessary.

5. AML / CFT

- Verification is undertaken at appropriate stages of player engagement.
- Monitor transactions for suspicious patterns.
- File required AML/CFT reports and maintain records.

6. IT Security

- Enforce role-based access and MFA.
- Protect data through encryption and backups.
- Document and respond to incidents.

7. Business Continuity

- Maintain backups, redundant systems, and recovery procedures.

8. Record Keeping & Reporting

- Maintain mandatory records for the required retention period.
- Submit reports to regulators as required.

9. Supplier & Vendor Oversight

- Conduct due diligence and maintain SLAs.
- Perform periodic reviews.

10. Internal Review

- Conduct annual internal audits and update procedures accordingly.

11. Manual Review

Reviewed annually or upon regulatory change.
Approved by the MLRO.

Approved by:	Miodrag Miletikj
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Signature and date	Miodrag 12/16/2025

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