



Geo-Restriction Implementation Statement

Date:
July 29, 2025

To:

Curaçao Gaming Authority (CGA)
Wilhelminaplein 4, Willemstad, Curaçao

From:

Axum B.V., a company incorporated under the laws of Curaçao
Company Number: 159207

Subject:

Statement of Implementation - Geo-Restriction Measures Based on CGA Compliance

1. Introduction

In line with the National Ordinance for Games of Chance (LOK) and the enforcement procedures under the Curacao Gaming Authority (CGA) regulatory framework, we hereby confirm that geo-restriction protocols have been deployed across our iGaming platform to fully comply with CGA jurisdictional and AML requirements. These measures prevent access from non-authorized territories, ensuring responsible gaming practices and adherence to public policy.

2. Geolocation Implementation Method

Our platform employs a multi-layered geolocation enforcement strategy, including:

- IP-Based Geolocation via MaxMind:

We use the MaxMind GeoIP2 database, updated weekly, to detect the user's location based on their IP address with high accuracy.

- Real-Time Access Control:

When a visitor accesses the platform, the system checks their IP against our geo-restriction rules. If the IP is

associated with a non-whitelisted country, the user is immediately redirected to a Geo Location Restriction page, stating that services are not available in their region.

- Anti-VPN Enforcement:

VPN usage is detected and blocked using MaxMind's anonymizer data and additional proxy detection rules to prevent circumvention.

3. Whitelisted Jurisdictions

To ensure strict compliance with Curaçao public policy and the CGA framework, our access policy is whitelist-based.

Only the following countries are allowed access to the platform:

- Bermuda
- Ghana
- Tanzania
- South Africa
- Kenya
- Rwanda
- Nigeria
- Uganda
- Senegal
- Benin
- Togo
- Cameroon
- Burkina Faso
- Ivory Coast
- Mali

All other countries are blocked by default. This approach prevents any access, registration, deposit, or game interaction from users located in unauthorized jurisdictions.

4. Additional Enforcement Measures

- Registration Prevention:

Players attempting to register from a restricted IP are blocked at the entry point.

- Payment System Geoblocking

Our cashier system is integrated with geolocation filters to prevent deposits or withdrawals involving restricted territories.

- Player Session Monitoring:

Device fingerprinting and behavioral analytics are used to detect and block access from high-risk or obfuscated locations.

- Audit Logging:

All restricted access attempts are logged for compliance and may be provided to CGA upon request.

5. Commitment to Compliance

Axum B.V. remains fully aligned with the CGA's mission of ensuring integrity, responsible operations, and market stability. Our technical infrastructure is built to respond dynamically to changes in regulatory frameworks and geopolitical sanctions lists.

We are prepared to provide live system demonstrations, access logs, and implementation evidence to the CGA team at any time upon request.

Sincerely,

A handwritten signature in black ink, appearing to read 'Marc AR Bean', with a stylized, looping flourish at the end.

Marc AR Bean
CEO

Axum BV
Paradise Games

www.pg-play.com