

Mitratech Curacao B.V. Operations Manual

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Document History

Version No.	Author	Creation Date	Approver	Approval Date	Change Summary
1.0	Billy-Jay Smith	27-10-2025	Board of Directors	xx-xx-xxxx	Document Creation

1. Purpose and Scope

Mitratesh Curacao B.V. with the registration number 146806, and registered address Zuikertuintjeweg Z/N (Zuikertuin Tower), Curacao (the “Company” or “Mitratesh”) is a Curacao registered and licensed entity, in accordance with the provisional license number ID/U1444/25 granted to it by the Gaming Control Board (“GCB”) of Curacao (also known as the Curacao Gaming Authority “CGA”) to provide critical services or goods in or from Curacao as referred to in Article 5.13, paragraph 1 of the National Ordinance on Games of Chance (LOK).

Article 5.9 of the LOK states that the holder of a license granted pursuant to Article 5.1, paragraph 1, must at all times maintain operational instructions containing information on the manner and extent of compliance with the provisions of or pursuant to this National Ordinance, as well as the regulations and restrictions associated with the gaming license.

While the aforementioned regulations are specifically tailored towards the operations of a B2C licensee, the Company has adopted and maintains this Operational Manual using guidance provided in the LOK by the CGA, ensuring that all required sections are completed and maintained. The Company commits to providing the CGA full access to the current version of this Operational Manual and all supporting documentation within five (5) business days of any request.

2. Product offering

Mitratesh operates a B2B Aggregator platform. What this means in practice is that the Company provides an API-based aggregation platform through which licensed B2C operators can access games supplied by multiple certified third-party providers. The Company itself does not create, modify, or host game logic, and does not accept wagers or make payouts to end-users. All games accessible via the platform are tested and certified by recognized laboratories as required by law.

3. Quality Assurance

The Company has a comprehensive process for quality assurance in line with regulatory requirements and industry best practices. This ensures that all systems, services, and operational processes consistently meet defined performance, security, and reliability standards, while maintaining compliance, minimizing errors, and promoting continuous improvement across all functions.

The Company’s process owner for Quality Assurance is the CTO

For a more detailed description of the processes followed for Quality Assurance, please see chapters 4.8 of the Company’s Information Security Policy.

4. Data collection and storage

As a B2B service provider, the Company does not directly process end-user personal data beyond what is necessary for API routing, reporting, or regulatory traceability. Any data received or stored is handled in accordance with applicable data-protection laws, encrypted in transit and at rest, and retained only for the purposes agreed in client contracts.

For a more detailed description of the Data collection and storage processes of the Company please see chapters 4.6 of the Company's Information Security policy.

5. Gaming Interface

The Company does not operate player-facing websites or applications. Visual elements are limited to technical integration dashboards and administrative portals for licensed client operators. Any content or visuals shown to end-users remain the responsibility of the B2C operator and the original game provider.

6. Technological controls for participants

The Company implements strict onboarding, access-control and integration validation mechanisms to ensure that only licensed and verified operators can access its API services. The system design inherently prevents any natural person from participating directly through Company infrastructure.

Regarding technical controls related to end users (player accounts) these would remain the responsibility of the B2C operators who grant, operate and maintain the player accounts.

7. Technical Infrastructure and recovery

The Company maintains detailed architectural documentation of its API platform and supporting systems. Business continuity and disaster-recovery mechanisms, including fail-over environments and backup procedures, ensure the timely restoration of services in the event of technical disruption.

For detailed explanations and diagrams of the aforementioned infrastructure and processes, please refer to Chapters 4.2, 4.4 and 4.5 of the Company's Information Security Policy

8. Responsible Gambling

Although the Company does not offer games directly to players, it supports responsible gaming by ensuring that only licensed client operators—who are themselves bound by responsible gaming obligations—can access and distribute the content. The Company assists partners by providing accurate data feeds, session information, and tools to facilitate compliance monitoring.

9. Terms and Conditions

The Company maintains up-to-date General Terms and Conditions governing relationships with client operators and game providers. These terms define responsibilities, data handling, confidentiality, and compliance with Curaçao regulatory requirements. As these terms can differ between providers and operators and are deemed to be confidential information, the exact text has not been included in this manual.

10. ADR

While the company does not operate player accounts, and as such, does not require the usual Alternative Dispute Resolution mechanisms a B2C provider should have in place, the Company has established a documented procedure for handling disputes with client operators and partners. As there are no direct players, disputes typically concern integration issues, financial reconciliations, or contractual matters. The procedure ensures fairness, transparency, and timely resolution consistent with Article 5.3 of the Ordinance.

11. Digital records of critical information

The Company maintains secure, tamper-evident digital records of all transactions routed through its API, including timestamps, game identifiers, and operator IDs. Relevant transaction logs are securely stored and replicated on servers located in a Tier-IV certified data centre in Curaçao, accessible for regulatory inspection by the CGA at any time.

12. Training

The Company ensures continuous professional education for all staff engaged in gaming-related activities, proportionate to their roles. Annual training covers mental wellbeing, anti-bribery, crime prevention, responsible gambling where applicable, anti-money-laundering awareness, communication ethics, and responsible advertising.

In regards to Information Security and AML awareness specifically, detailed explanations of the training provided can be found in their respective Information Security and AML/CFT documentation.

13. Operations Manual Updates and Reviews

The Company monitors all ministerial decrees or amendments affecting the content of the Operational Manual and updates its documentation accordingly to ensure continuous compliance.