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SDG Tech N.V

Business Plan

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Executive Summary

SDG Tech N.V. is a technology company focused on the development and operation of a mobile-first online poker platform serving the Asian regional market. The Company's core product is a real-money poker application designed for both mobile and desktop users, offering a secure, stable and compliant gaming environment.

The platform emphasizes game integrity, data security, and regulatory compliance. SDG Tech N.V. implements industry-standard encryption, secure payment processing, and strict operational controls. All gaming outcomes will be validated through independent RNG certification carried out by an accredited testing laboratory prior to commercial launch.

The Company applies a comprehensive compliance framework, including Know-Your-Customer (KYC), Anti-Money Laundering (AML) procedures, and Responsible Gaming policies to ensure full adherence to Curaçao regulatory requirements. Player funds are maintained separately from operational funds, and internal controls are implemented to prevent fraud, abuse, and financial misconduct.

SDG Tech N.V.'s technology infrastructure is built on cloud-based architecture using Amazon Web Services (AWS), providing high availability, scalability, and performance. The mobile application is developed using cross-platform technologies, while the backend system is designed to support real-time gameplay, secure transaction processing, and continuous monitoring.

The initial operational capital of USD 100,000 has been provided by the founders and seed investors. These funds are allocated primarily towards platform development, licensing and compliance, payment integration, security infrastructure, and initial market deployment. Based on conservative internal projections, the Company targets a serviceable market size of approximately USD 2 million in its initial operating regions.

Through a controlled and compliance-driven growth strategy, SDG Tech N.V. aims to establish a stable and fully regulated online poker operation under the Curaçao regulatory and licensing framework.

Opportunity

Problem & Solution

The online poker market in Asia continues to grow rapidly; however, it remains fragmented and largely underserved by fully regulated and compliance-driven operators. Many existing platforms prioritize rapid user acquisition over regulatory standards, resulting in increased risks related to player fund safety, payment transparency, data protection, and responsible gaming.

One of the key challenges in the current market is the lack of standardized compliance controls across many offshore poker platforms. Inadequate KYC and AML implementation exposes both players and operators to financial crime and regulatory risk. SDG Tech N.V. addresses this issue by implementing strict KYC verification, ongoing transaction monitoring, and AML procedures in full alignment with Curaçao regulatory requirements.

Another significant issue is the protection and segregation of player funds. On many unregulated platforms, player balances are not properly safeguarded. SDG Tech N.V. maintains full segregation between operational funds and player funds, supported by internal financial controls and payment flow monitoring to ensure transparency and financial security.

Payment reliability and processing transparency also remain a key challenge in the region. Delayed withdrawals and unclear transaction flows erode user confidence. SDG Tech N.V. integrates regulated payment service providers and establishes clear withdrawal processing standards to ensure timely, traceable, and secure transactions.

From a product and operational perspective, SDG Tech N.V. positions itself as a mobile-first, compliance-driven online poker platform, offering stable gameplay supported by secure infrastructure and continuous system monitoring. By addressing regulatory, financial, and operational risks simultaneously, the Company establishes a sustainable and fully compliant solution for the regional online poker market.

SDG Tech N.V.'s online poker platform is designed with a strong emphasis on regulatory compliance, data security, financial transparency, and responsible gaming. The Company's primary objective is to provide a stable and fully controlled operating environment under the Curaçao regulatory framework while ensuring a secure and fair gaming experience for all players.

The platform applies industry-standard encryption technologies to protect user data and financial information. All payment transactions are processed through regulated payment service providers, with full segregation between operational funds and player funds. Internal monitoring systems and audit-ready transaction records are maintained to ensure transparency and financial accountability.

Game fairness is ensured through independent Random Number Generator (RNG) certification conducted by an accredited testing laboratory prior to commercial launch. Continuous system monitoring and technical controls are implemented to prevent manipulation, abuse, or unauthorized system access.

From an operational perspective, SDG Tech N.V. implements comprehensive Know-Your-Customer (KYC), Anti-Money Laundering (AML), and Responsible Gaming policies. These measures are designed to protect users, prevent financial crime, and ensure full adherence to Curaçao regulatory requirements.

The platform is built on a scalable cloud-based infrastructure with real-time monitoring and controlled access management. All core systems are designed for auditability, regulatory reporting, and long-term operational stability.

Through this compliance-driven solution framework, SDG Tech N.V. aims to establish a sustainable, transparent, and fully regulated online poker operation in its initial target markets.

To further differentiate our platform and enhance user engagement, we've integrated unique social features that allow players to connect, chat, and compete with friends. This social aspect adds a new dimension to online poker and

iGambling, creating a more immersive and enjoyable experience. By combining these elements - security, accessibility, and social interaction - SGD Tech N.V. provides a secure, accessible, and engaging online poker and iGambling experience that stands out in the market and addresses the most pressing needs of today's players.

- **Security and Fair Play:** Advanced encryption and random number generation technology
- **Accessibility:** Intuitive user interface optimized for both mobile and desktop
- **Social Interaction:** Unique features for connecting and competing with friends
- **Comprehensive Platform:** Wide variety of poker variants and casino games

Target Market

SDG Tech N.V. primarily targets adult users aged 21 and above within selected Asian jurisdictions where online poker and regulated gaming services are legally permitted. The Company adopts a regional market focus rather than a global deployment model, ensuring all operations remain within applicable legal and regulatory frameworks.

The primary user segment consists of mobile-first adult poker players who engage in online gaming through smartphones and desktop devices. Secondary segments include desktop-based poker enthusiasts and casual casino game users within the same regulated jurisdictions.

Market entry and expansion will be conducted gradually based on regulatory approvals, payment infrastructure availability, and compliance readiness.

Competition

The regional online poker market consists of both licensed and offshore operators. While some established brands offer large player pools and tournament networks, many unregulated platforms lack adequate compliance controls, financial safeguards, and responsible gaming measures.

SDG Tech N.V. differentiates itself by operating strictly within a regulated framework, emphasizing KYC verification, AML monitoring, fund segregation, and payment transparency rather than competing solely on promotional intensity or player acquisition volume.

Our Advantages - Regulatory Version

SDG Tech N.V.'s competitive positioning is based on operational compliance, financial transparency, and system security rather than short-term promotional advantages. The platform incorporates:

- Regulated KYC and AML compliance procedures
- Full segregation of player and operational funds
- Secure payment processing via regulated PSPs
- Cloud-based infrastructure with continuous system monitoring
- Independent RNG certification prior to commercial launch

These measures support long-term regulatory sustainability and player protection.

Company Overview

SDG Tech N.V., a promising startup in the online poker and iGaming industry, is structured as a Private Limited Liability Company (N.V.) incorporated and registered in Curaçao, with its registered office at Trias Building, Hanchi Snoa 19, Willemstad, Curaçao.

This strategic choice of jurisdiction provides the company with a favorable regulatory environment for operating its innovative mobile and desktop gaming platforms. The company's ownership is currently distributed among its founding members, with plans to potentially expand ownership to include strategic investors as the business grows.

The ownership structure of SDG Tech N.V is as follows:

- THIRUCHELVAM KALAI ARASU: 100%

The management team of SDG Tech N.V is comprised of experienced professionals with diverse backgrounds in technology, gaming, and business development. The current leadership structure includes:

- Chief Executive Officer (CEO)
- Chief Operating Officer (COO)
- Chief Marketing Officer (CMO)
- Money Laundering Reporting Officer (MLRO)
- Chief Technology Officer (CTO)
- Chief Financial Officer (CFO)
- Compliance Officer

As SDG Tech N.V continues to grow, the company plans to expand its management team to include additional key roles such as Chief Financial Officer (CFO) and Chief Marketing Officer (CMO). The company is also in the process of establishing an Advisory Board consisting of industry experts to provide strategic guidance and support the company's rapid growth in the competitive online poker and igambling market. This lean and agile organizational structure allows SDG Tech N.V to make quick decisions and adapt swiftly to market changes, positioning the company for success in the dynamic USD 2M online poker and igambling industry.

Local Managing Director / Corporate Service Provider (CSP)

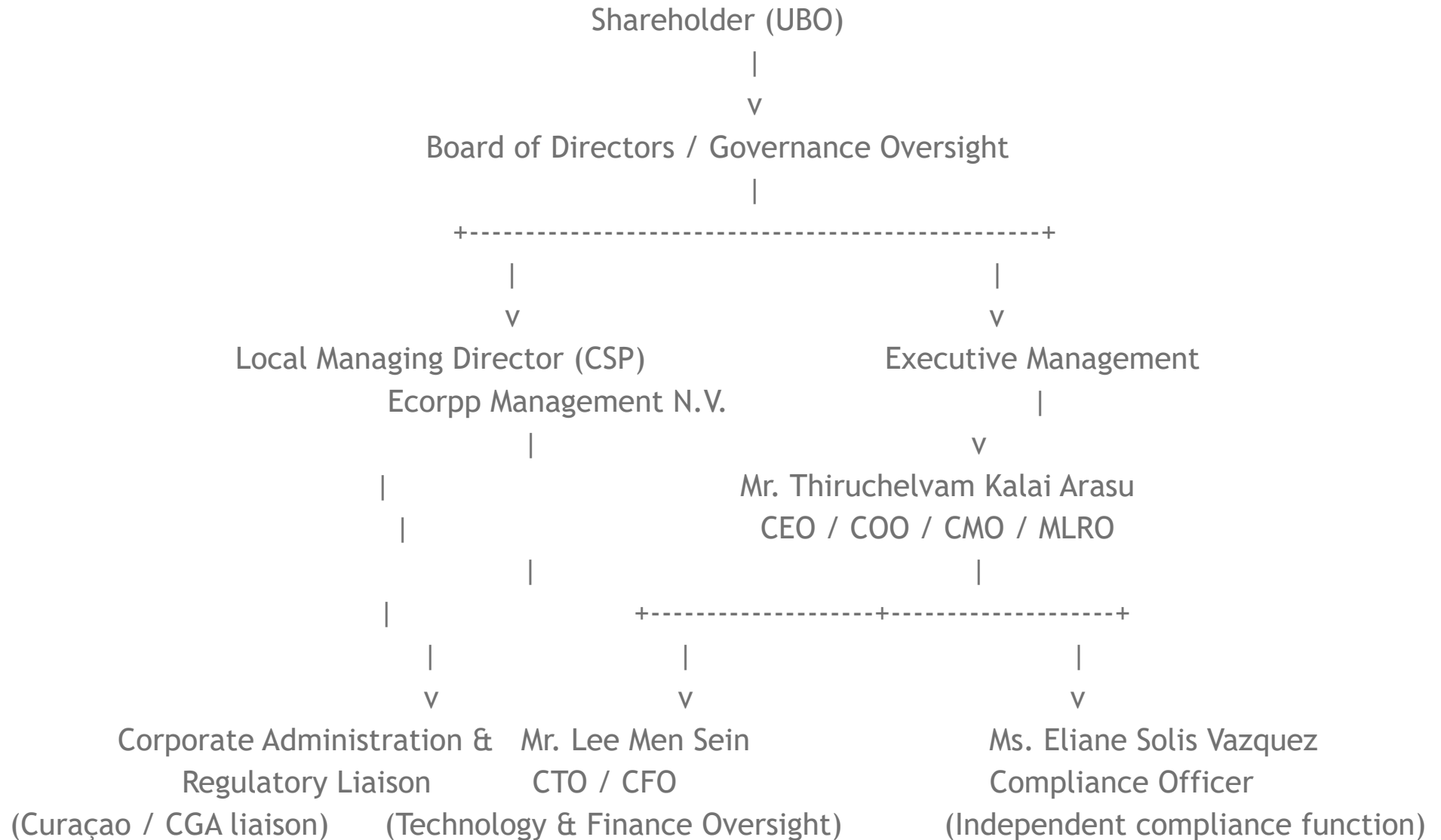
Local Managing Director / CSP:

Ecorpp Management N.V.

Role & Responsibility:

Ecorpp Management N.V. acts as the local managing director and corporate service provider in Curaçao and is responsible for:

- Local corporate governance and statutory representation
- Liaison with Curaçao Gaming Authority (CGA)
- Maintenance of statutory records and regulatory correspondence
- Ensuring ongoing compliance with Curaçao LOK (2024)



Management Team

SDG TechN.V. is spearheaded by a dynamic and highly skilled management team, each bringing a unique set of expertise to propel the company's growth in the fiercely competitive online poker and iGaming industry. The leadership team is strategically positioned to capitalize on the rapidly evolving mobile and desktop gaming market, combining deep knowledge of cutting-edge technology, gaming mechanics, business development, and innovation. Here's an overview of the key leadership roles:

Key Management and Compliance Functions

The following individuals are appointed to key management and compliance functions within SDG Tech N.V.:

Chief Executive Officer (CEO)

Chief Operating Officer (COO)

Chief Marketing Officer (CMO)

Money Laundering Reporting Officer (MLRO)

Mr. Thiruchelvam Kalai Arasu

Mr. Thiruchelvam Kalai Arasu holds the roles of Chief Executive Officer, Chief Operating Officer, Chief Marketing Officer, and Money Laundering Reporting Officer (MLRO). He has over 15 years of experience in the iGaming and online poker industry, with extensive expertise in business strategy, platform operations, player acquisition, and market expansion.

In his capacity as MLRO, Mr. Arasu is responsible for oversight of the Company's anti-money laundering framework, including transaction monitoring, internal reporting procedures, escalation of suspicious activities, and coordination with compliance personnel and relevant authorities where required.

In his executive roles, Mr. Arasu is responsible for overall strategic leadership, operational oversight, marketing governance, and ensuring that the Company operates in accordance with applicable regulatory and licensing requirements.

Chief Technology Officer (CTO)

Chief Financial Officer (CFO)

Mr. Lee Men Sein

Mr. Lee Men Sein serves as both Chief Technology Officer and Chief Financial Officer of SDG Tech N.V. He has over 10 years of experience in software engineering, system architecture, financial planning, and technology-driven business operations.

His responsibilities include oversight of platform architecture, infrastructure security, system scalability, financial controls, budgeting, and coordination between technical and financial functions to support regulatory compliance and operational stability.

Compliance Officer

Ms. Eliane Solis Vazquez

Ms. Eliane Solis Vazquez is appointed as Compliance Officer of SDG Tech N.V. She has relevant professional experience in regulatory compliance, governance, and internal control frameworks within regulated industries.

She is responsible for monitoring compliance with Curaçao Gaming Authority requirements, overseeing responsible gaming controls, maintaining internal compliance policies, and supporting regulatory reporting, internal audits, and ongoing compliance monitoring.

SDG Tech N.V recognizes the importance of having a strong advisory board to guide the company through the challenges of the competitive online poker and igambling industry. As a startup, we are in the process of assembling a team of experienced advisors who can provide valuable insights, industry connections, and strategic guidance to support our rapid growth and market penetration efforts.

Our advisory board will consist of experts from various fields relevant to our business, including:

- Kishan Srivastava, a veteran in the online gambling industry with over 20 years of experience, who will provide insights on market trends and regulatory compliance.
 - Anuj Yadav, a technology expert specializing in mobile app development and user experience design, to help refine our mobile-first strategy.
- Prabhakar Posam, a financial advisor with expertise in startup funding and growth strategies for the igambling sector.
- Akshay Jadhav, a legal expert well-versed in international gambling laws and regulations, particularly in the Asian market.

These advisors will play a crucial role in shaping SDG Tech N.V's strategic direction, helping us navigate regulatory challenges, optimize our technology stack, and identify growth opportunities. Their collective experience and network will be invaluable as we seek to establish ourselves as a leading player in the USD 2M online poker and igambling industry.

As our business evolves, we plan to expand our advisory board to include additional experts in areas such as blockchain technology, artificial intelligence, and responsible gambling practices. This dynamic approach to our advisory structure will ensure that SDG Tech N.V remains at the forefront of innovation and responsible business practices in the rapidly changing online gambling landscape.

Staffing Plan

SDG Tech N.V. operates with a lean and scalable staffing model appropriate for its initial operational phase.

At launch, the Company's core functions are managed by approximately 3–5 full-time equivalent (FTE) personnel, covering executive management, technology, operations, finance, marketing, and compliance oversight.

Key staffing structure includes:

- Executive management and strategic oversight – internal
- Technology development and system administration – internal
- Compliance oversight and reporting – internal
- Customer support, payment processing support, and certain technical services – outsourced to vetted third-party service providers where appropriate

Outsourced service providers are subject to due diligence, contractual controls, and ongoing performance and compliance monitoring. Staffing levels may be expanded in line with business growth, regulatory requirements, and operational demand.

Compliance Function Description

SDG Tech N.V. maintains a dedicated compliance function designed to ensure adherence to the requirements of the Curaçao Gaming Authority and applicable regulatory standards.

Money Laundering Reporting Officer (MLRO)

The MLRO function is performed by Mr. Thiruchelvam Kalai Arasu. The MLRO is responsible for oversight of the Company's anti-money laundering (AML) and counter-terrorist financing (CTF) framework.

Key responsibilities of the MLRO include:

- Oversight of transaction monitoring and suspicious activity detection
- Review and escalation of suspicious transactions in accordance with internal policies
- Maintenance of AML policies, procedures, and internal reporting mechanisms
- Coordination with the Compliance Officer and relevant authorities where required

The MLRO operates with functional independence and reports directly to senior management. Adequate authority and access to information are provided to enable effective performance of the role.

Compliance Monitoring Framework and Tools

The compliance function is supported by system-level controls and monitoring tools, including:

- Automated transaction monitoring rules and alerts
- Risk-based customer profiling and ongoing due diligence
- Audit logs and reporting dashboards for compliance review
- Periodic internal compliance reviews and reporting

Compliance activities are reviewed on an ongoing basis to ensure effectiveness and alignment with regulatory expectations.

Marketing&Sales

SDG Tech N.V.'s marketing strategy is developed and implemented in strict accordance with Curaçao regulatory requirements, applicable international advertising standards, and local laws within each target jurisdiction. The Company adopts a compliance-first approach to all promotional and marketing activities to ensure that user acquisition is conducted responsibly, transparently, and within legally permitted regions only.

All marketing content is reviewed internally prior to publication to ensure that it does not target prohibited jurisdictions, minors, or vulnerable individuals. Geo-restriction, IP filtering, and age-verification mechanisms are implemented across all advertising and traffic acquisition channels to prevent access from restricted regions.

The primary objectives of the marketing plan are:

- To acquire users through lawful and compliant channels
- To establish a trustworthy and regulated brand image
- To achieve sustainable user growth without reliance on aggressive or high-risk promotional tactics
- To promote responsible gaming principles across all communication channels

Marketing performance is continuously monitored through internal reporting systems, and all campaigns are subject to compliance audits where required by regulatory authorities.

2. Permitted Marketing Channels

2.1 Search Engine Optimization (SEO) – Compliant Visibility

SDG Tech N.V. utilizes compliant search engine optimization practices to enhance organic visibility in legally permitted markets. SEO activities focus on informational and brand-related content rather than aggressive gambling solicitation. All website content complies with responsible gaming guidelines and includes clear regulatory disclosures.

Key SEO activities include:

- Optimization of website metadata and structure
- Educational content related to poker, gaming rules, and responsible gaming
- Publication of compliance-related information, licensing disclosures, and player protection policies
- Mobile performance optimization to ensure accessibility and usability

All SEO content avoids misleading claims and does not promote illegal gambling in restricted jurisdictions.

2.2 Affiliate Marketing – Regulated Partnerships

Affiliate marketing is conducted exclusively through registered and contractually bound partners. All affiliate partners are subject to internal due diligence, compliance screening, and ongoing monitoring to ensure alignment with regulatory requirements.

Affiliate agreements include:

- Mandatory compliance with Curaçao gaming regulations
- Prohibition of misleading advertising and prohibited traffic sources
- Restrictions on targeting minors and restricted territories
- Obligations to display responsible gaming warnings and licensing disclosures

Affiliate activity is continuously tracked through monitoring platforms to ensure transparency and regulatory accountability.

2.3 App Store Visibility & Distribution Compliance

SDG Tech N.V. maintains app store listings in compliance with the policies of Apple App Store and Google Play Store. Distribution regions are restricted according to legal approvals and licensing arrangements.

All app descriptions, keywords, and promotional materials comply with:

- Platform-specific real-money gaming guidelines
- Local regulatory advertising standards
- Age-restriction and responsible gaming disclosure requirements

No unauthorized distribution or sideloading practices are permitted.

2.4 Direct Marketing with User Consent

Direct marketing communication with registered users (including email and in-app messages) is strictly based on explicit user consent and opt-in mechanisms. Users are provided with clear options to unsubscribe or opt out at any time.

Direct marketing communications are limited to:

- Verified registered users
- Users within legally permitted jurisdictions
- Messaging that includes responsible gaming notices

3. Promotions & Incentives – Risk-Controlled Framework

All promotional activities at SDG Tech N.V. are governed by a centralized incentive control framework designed to ensure transparency, financial security, and regulatory compliance. Promotions, rebates, loyalty programs, and tournament incentives are implemented only after internal risk assessment and compliance approval.

Key principles governing all promotional programs include:

- Clearly defined wagering requirements
- Bonus value limits and transaction thresholds
- Anti-money laundering (AML) transaction monitoring
- Bonus abuse detection and prevention mechanisms
- Responsible gaming limits and self-exclusion controls

All promotion terms and conditions are published transparently and remain fully auditable. Promotional abuse, arbitrage behavior, and suspicious activity are flagged automatically by internal monitoring systems for further review.

Guaranteed prize pools, where applicable, are supported by defined internal financial controls and separate accounting treatment to ensure prize fund availability and traceability.

4. Responsible Advertising & Player Protection

SDG Tech N.V. integrates responsible gaming messaging across all marketing and promotional materials. The Company ensures that no communication encourages excessive gambling behavior, misleading financial expectations, or unlawful participation.

Key responsible advertising controls include:

- Prohibition of marketing to minors
- Clear display of age restrictions
- Display of responsible gaming disclaimers
- Promotion of self-exclusion tools and player control features
- Referral to responsible gaming support resources where applicable

All marketing staff and affiliates receive compliance guidance and training to ensure consistent application of responsible advertising standards.

5. Sales Plan – Regulatory-Oriented Growth

The sales strategy of SDG Tech N.V. focuses on sustainable acquisition, lawful conversion, and long-term player retention within regulated environments. The Company emphasizes quality of users and compliance integrity over volume-based growth.

The sales structure is organized around four key pillars:

5.1 User Acquisition

User acquisition is driven through compliant digital channels, regulated affiliates, and approved app store distribution. All onboarding processes require full KYC verification prior to account activation or financial transactions.

5.2 User Conversion

Conversion is achieved through transparent registration processes, secure payment onboarding, and clear information disclosure. All deposits and withdrawals are processed through regulated payment service providers with full audit trails and AML transaction monitoring.

5.3 Player Retention

Player retention is supported through responsible engagement mechanisms, loyalty programs with risk controls, and performance-based incentives that comply with regulatory requirements. Retention strategies avoid excessive promotional dependency and prioritize user trust and platform reliability.

5.4 Player Engagement

Engagement initiatives are designed around controlled community interaction, regulated tournaments, and compliant social features. All interaction tools remain subject to moderation, age verification, and behavioral monitoring to ensure regulatory compliance.

6. Geographic Market Compliance & Expansion

Market deployment and expansion are conducted on a phased basis. The Company only accepts players from jurisdictions where online poker services are legally permitted and commercially supported by compliant payment infrastructure.

Geo-restriction technologies are actively enforced to:

- Block access from prohibited territories
- Prevent illegal cross-border operation
- Ensure jurisdictional integrity of the platform

Market expansion decisions are reviewed continuously based on regulatory approvals, payment partner availability, and operational readiness.

7. Marketing & Sales Governance and Monitoring

All marketing and sales activities are subject to internal governance procedures, including:

- Compliance review prior to campaign launch
- Ongoing transaction and traffic monitoring
- Affiliate performance audits
- Bonus abuse detection reporting
- Regulatory reporting where required

Marketing performance metrics are evaluated in conjunction with compliance risk indicators to maintain a balanced and sustainable growth strategy.

Locations & Facilities

SDG Tech N.V. operates as a fully digital online gaming business and has structured its physical and technical facilities to support secure, compliant, and stable operations in accordance with Curaçao regulatory requirements. The Company's primary place of management and core compliance functions are established in Curaçao, serving as the central point for regulatory oversight, corporate governance, and key operational decision-making.

The Company adopts a hybrid operational model combining limited physical office facilities with secure cloud-based infrastructure. This structure ensures operational efficiency, regulatory control, and business continuity while maintaining proper separation between development, live operations, and compliance monitoring functions.

All physical facilities used by SDG Tech N.V. are access-controlled and restricted to authorized personnel only. Internal access rights are governed by role-based permissions, and all sensitive operational systems are protected through multi-factor authentication and internal audit logging.

Jurisdictions & Market Access Control

Target Jurisdictions (Permitted Markets)

SDG Tech N.V. offers its online gaming services exclusively in jurisdictions where online gaming is not expressly prohibited by law and where offshore gaming operators are commonly permitted to operate under an international gaming license.

Based on regulatory risk assessment, market permissibility, and internal compliance review, the Company targets players located in the following jurisdictions:

Latin America

- Mexico
- Brazil
- Chile
- Peru
- Colombia
- Argentina

Africa

- Nigeria
- Ghana
- Kenya
- South Africa

Central Asia & CIS

- Kazakhstan
- Uzbekistan
- Kyrgyzstan

Market availability is reviewed on an ongoing basis, and access may be restricted or withdrawn in response to regulatory developments or compliance risk assessments.

Explicitly Prohibited and Excluded Jurisdictions

SDG Tech N.V. does not offer its services to players located in jurisdictions where online gaming is prohibited, restricted, or subject to local licensing requirements not held by the Company.

The following jurisdictions are explicitly blocked and excluded:

Asia

- Mainland China
- Hong Kong
- Macau
- Singapore
- Malaysia
- Thailand
- Indonesia
- Vietnam
- Japan
- Taiwan

Europe

- United Kingdom
- All European Union member states

North America

- United States of America (all states and territories)

Oceania

- Australia
- New Zealand

Other

- Curaçao (domestic market excluded)
- Any jurisdiction subject to international sanctions, embargoes, or FATF high-risk classification

Jurisdictional Access Controls

To enforce jurisdictional restrictions, SDG Tech N.V. implements the following controls:

- IP-based geo-blocking and country-level access restrictions
- KYC verification of player identity and country of residence
- Detection and mitigation of VPN, proxy, and location masking technologies
- Account suspension or termination upon detection of prohibited jurisdiction access
- Ongoing monitoring and compliance review by the Compliance Officer

These measures are applied prior to account activation and continuously throughout the player lifecycle.

Data Centers & Hosting Environment

SDG Tech N.V. operates its gaming platform on a secure cloud-based infrastructure utilizing Amazon Web Services (AWS).

All hosting locations are selected based on data security, redundancy, latency optimization, and regulatory risk assessment.

Primary Hosting Regions

- AWS Asia Pacific (Singapore – ap-southeast-1)
- Primary production environment for application servers and game orchestration services.

Secondary / Redundancy Regions

- AWS Asia Pacific (Tokyo – ap-northeast-1)
- Used for failover, disaster recovery, and system redundancy.
- AWS Europe (Frankfurt – eu-central-1)
- Used for backup storage, log archiving, and compliance-related data retention where applicable.

Player data, transaction records, and audit logs are stored in encrypted databases with role-based access controls.

Cross-region replication and daily backups are implemented to ensure business continuity and disaster recovery.

Data Protection & Cross-Border Data Compliance

All personal data, transactional data, and operational records are processed in accordance with internationally recognized data protection principles. User and financial data are encrypted at rest and in transit. Cross-border data transfers are strictly controlled, logged, and restricted to authorized compliance and technical personnel only.

SDG Tech N.V. maintains full segregation between:

- Player data
- Operational data
- Financial and payment data

to prevent unauthorized access and systemic risk.

Technology

SDG Tech N.V. utilizes a secure, scalable, and auditable technology architecture designed to meet the operational and regulatory standards required for licensed online gaming operations under Curaçao jurisdiction.

The platform is built on a cloud-native infrastructure powered by Amazon Web Services (AWS), ensuring:

- High system availability
- Redundancy and disaster recovery
- Real-time scalability
- Continuous security monitoring

This infrastructure supports both mobile and desktop platform functionality while maintaining consistent performance during peak traffic periods.

Application Architecture

The mobile client is developed using cross-platform technologies to ensure compatibility with both iOS and Android operating systems. Desktop applications operate on a unified backend environment that supports real-time synchronization of game data, wallets, and user activity.

Backend services are built under enterprise-grade development frameworks with clear separation between:

- Game logic
- Wallet and payment processing
- Compliance monitoring systems
- User account and identity management

All system changes are subject to version control, internal testing, and staged deployment procedures.

Security & System Integrity

Security and fairness are fundamental to all system implementations. The platform implements:

- Industry-standard encryption protocols for all user communications and transactions
- Secure authentication mechanisms for users and internal staff
- Continuous vulnerability scanning and penetration testing

The Random Number Generator (RNG) system used across all games is independently certified and subject to periodic re-certification as required by the licensing authority. All game outcomes are auditable, verifiable, and protected from external manipulation.

AML, Fraud & Monitoring Systems

All deposits, withdrawals, and in-platform transactions are subject to:

- Real-time transaction monitoring
- Automated suspicious activity detection
- Withdrawal approval controls
- Full audit trails for regulatory inspection

Advanced rule-based and behavioral monitoring systems are implemented to identify:

- Fraudulent activity
- Bonus abuse
- Multi-accounting
- Collusion and money laundering patterns

KYC & Customer Due Diligence Workflow

All players are subject to a structured KYC and customer due diligence process, which includes:

- Automated identity verification at account registration and prior to withdrawals
- Risk-based customer profiling and ongoing monitoring
- Enhanced due diligence (EDD) for higher-risk users based on transaction behavior and jurisdictional risk indicators
- Manual compliance review and escalation procedures where automated checks flag potential risks

AML Workflow

1. AML Monitoring Framework

SDG Tech N.V. operates a risk-based Anti-Money Laundering (AML) monitoring framework combining automated transaction monitoring systems with manual compliance review.

AML monitoring is applied to all players, regardless of risk classification, and is enhanced for medium- and high-risk profiles.

Monitoring covers, at a minimum:

- Deposit and withdrawal behavior
- Transaction velocity and frequency
- Cross-border payment activity
- Wallet-to-wallet movement patterns
- Gameplay behavior inconsistent with player profile
- Attempts to circumvent limits or controls

Automated alerts are generated in real time and reviewed by the Compliance function.

2. Monitoring Rules & Thresholds

The following non-exhaustive monitoring rules and thresholds are applied:

Transaction Thresholds

- Cumulative deposits exceeding USD 10,000 within a rolling 30-day period
- Single or multiple withdrawals exceeding USD 5,000 within 24 hours
- Rapid deposit-withdrawal cycles with minimal gameplay
- Structuring behavior designed to avoid reporting thresholds

Behavioral & Risk Indicators

- Use of multiple payment methods within a short timeframe
- Frequent changes in IP address or device fingerprint
- Transactions involving high-risk or sanctioned jurisdictions
- Repeated failed KYC or document resubmissions
- Alerts triggered by PSP-level or third-party fraud systems

Thresholds are reviewed periodically and adjusted based on regulatory guidance, operational risk, and observed trends.

3. Alert Handling & Escalation Process

When an alert is generated:

1. Initial Review
2. Automated alerts are reviewed by Compliance within 48 hours.
3. Risk Assessment
4. The transaction and player profile are assessed against AML risk indicators.
5. Escalation
6. Where activity cannot be reasonably explained, the case is escalated to the MLRO for further investigation.
7. Action Taken
8. Depending on the outcome:
 - Continued monitoring
 - Application of Enhanced Due Diligence (EDD)
 - Temporary account restrictions
 - Suspension pending investigation

4. Suspicious Transaction Reporting (UTR / STR – NORUT)

Where there are reasonable grounds to suspect money laundering, terrorist financing, or related criminal activity, SDG Tech N.V. submits a Suspicious Transaction Report (STR) or Unusual Transaction Report (UTR) to the Curaçao Financial Intelligence Unit via NORUT / goAML.

Reporting obligations include:

- Reports are submitted without delay once suspicion is formed
- Reporting is conducted independently of whether a transaction is completed
- Players are not informed of any report submission (tipping-off prohibition)

The MLRO is responsible for determining reportability and ensuring timely submission.

5. goAML Registration & Regulatory Reporting

SDG Tech N.V. is registered (or in the process of registration) with the Curaçao Financial Intelligence Unit reporting system (goAML / NORUT) for the submission of UTRs and STRs.

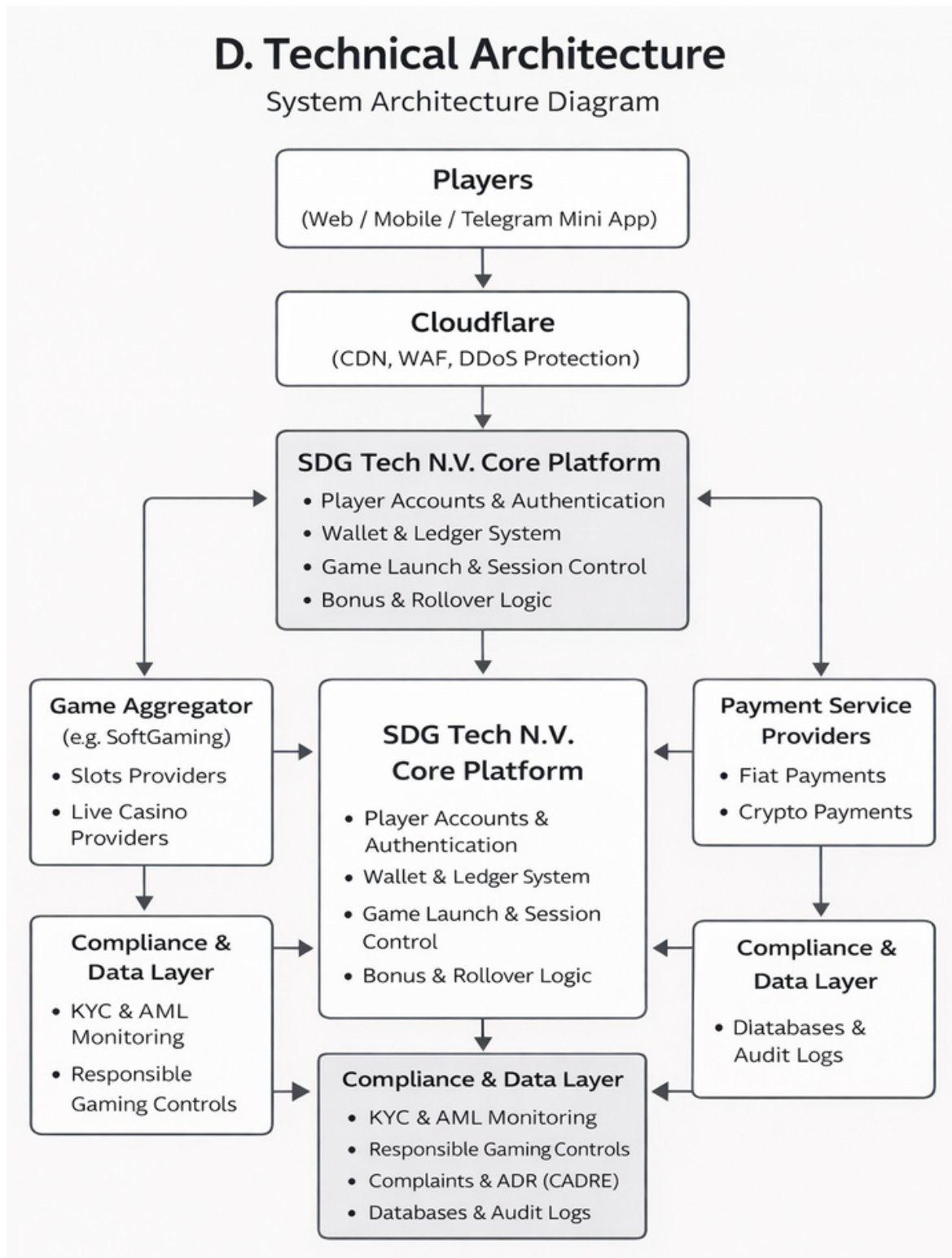
Access to the reporting system is restricted to authorized personnel only. Reporting credentials, submissions, and correspondence are securely maintained.

6. Governance & Oversight

- Overall responsibility for AML compliance rests with the MLRO
- The Compliance Officer supports monitoring, investigations, and reporting
- AML controls are reviewed periodically and updated based on:
 - Regulatory developments
 - CGA guidance
 - Internal risk assessments

D. Technical Architecture

System Architecture Diagram



Account restrictions, withdrawal limits, or account suspension measures may be applied until verification requirements are fully satisfied.

Responsible Gaming Controls

The platform implements system-level responsible gaming tools designed to promote safe and controlled gameplay, including:

- Player-configurable deposit limits, loss limits, and session limits
- Temporary self-exclusion and cooling-off period functionality
- Automated monitoring of potentially problematic gaming behavior
- Clear access to responsible gaming information and player support resources

Responsible gaming controls are enforced at the system level and monitored by compliance personnel in accordance with regulatory requirements.

Payment Methods & Payment Service Providers

SDG Tech N.V. supports multiple payment methods to facilitate player deposits and withdrawals, integrated through licensed third-party payment service providers (PSPs).

The platform supports the following payment categories:

- Bank transfers and local payment methods, processed via regulated PSPs operating in recognized financial jurisdictions
- E-wallet payment solutions, subject to provider availability and jurisdictional compliance
- Cryptocurrency payments, supported through compliant crypto payment gateways with blockchain-level transaction traceability

All payment service providers are subject to due diligence, contractual compliance obligations, and ongoing monitoring.

PSPs utilized by the platform are established in regulated jurisdictions, including but not limited to:

- European Union jurisdictions
- Asia-Pacific jurisdictions

At the time of license application:

- Core payment integrations are in testing and pre-production stages
- Additional PSP integrations may be activated post-licensing, subject to regulatory approval and internal compliance review

No payment service provider is granted unrestricted access to player wallets or internal ledger systems.

Third-Party Integrations

All integrations with payment service providers, game providers, and third-party platforms are conducted through secured APIs with strict access controls and logging. No third-party system is granted unrestricted access to core wallet or compliance systems.

All third-party providers are subject to due diligence, contractual compliance obligations, and ongoing monitoring.

SDG Tech N.V. maintains essential equipment and internal tools to support software development, quality assurance, compliance monitoring, and internal administration. No physical equipment located on company premises is used to process live player funds or execute real-money gaming transactions.

Software & Hardware Tools/Equipment

The Company uses enterprise-standard software systems for:

- Cloud hosting and infrastructure management
- Secure software development and deployment
- Source code version control and access logging
- System monitoring and performance reporting
- Fraud detection and compliance review

All internal systems are protected by strict user authentication policies and access monitoring.

Physical equipment is maintained strictly for:

- Development and quality assurance
- Internal testing environments
- Compliance administration and reporting

This includes:

- High-performance workstations for development and testing teams
- Cross-platform mobile and desktop testing devices
- Controlled internal servers used solely for development and non-production testing
- Secure networking equipment with firewall and intrusion protection systems

Third-Party Service Providers

SDG Tech N.V. engages only reputable and licensed third-party providers that have undergone internal due diligence and compliance review.

Payment Service Providers (PSP)

- **CoinPaid** – Crypto payment processing (Estonia)
- **PayCrypto** – Fiat and alternative payment processing (Malta)

Game Aggregator

- **SoftGaming** – Game aggregation platform integrating multiple certified slot and live casino providers

KYC / Identity Verification

- **Sumsb** (or equivalent provider, subject to final onboarding)
- Used for player identity verification, document validation, liveness checks, and sanctions screening.

Fraud & Risk Monitoring

- Transaction monitoring and risk scoring are implemented via:
- PSP-level fraud detection tools
- Internal behavioral monitoring rules
- Manual compliance review for flagged accounts

All third-party providers are subject to ongoing monitoring, contractual compliance obligations, and periodic review.

Penetration Testing & Security Assessments

SDG Tech N.V. conducts regular security testing to ensure the integrity, availability, and confidentiality of its systems.

Penetration Testing

- Frequency: At least once annually, and after any major system changes
- Scope:
 - Web application security
 - API endpoints
 - Wallet and transaction systems
 - Authentication and access controls
- Provider: Independent third-party cybersecurity firm (to be appointed prior to go-live)

Identified vulnerabilities are tracked, prioritized, and remediated according to internal security policies.

Penetration testing reports are retained and made available to regulators upon request.

Change Management Policy (Summary)

SDG Tech N.V. maintains a structured change management process to ensure system stability and regulatory compliance.

Change Categories

- Minor updates (UI improvements, non-critical fixes)
- Major changes (wallet logic, payment flows, game integrations, compliance features)

Change Management Controls

- All changes are documented and approved internally prior to deployment
- Major changes undergo:
 - Risk assessment
 - Regression testing
 - Compliance impact review
- Production deployments are logged and auditable

Emergency Changes

- Emergency fixes are permitted where required to address security or operational risks
- Post-implementation review is mandatory for all emergency changes

This framework ensures operational continuity while minimizing risk to players and regulatory obligations.

Compliance Requirements – Know Your Customer (KYC) Framework

SDG Tech N.V. implements a mandatory, risk-based Know Your Customer (KYC) framework in accordance with the Curaçao Gaming Authority (CGA) LOK requirements, applicable AML/CFT laws, and international regulatory standards.

KYC verification is required prior to withdrawal and may be triggered earlier based on risk indicators.

1. KYC Onboarding Workflow (Mandatory Process)

The KYC onboarding process is executed as follows:

1. Player creates an account by providing basic personal information (full name, date of birth, nationality, country of residence).
2. Account is created in restricted status until KYC requirements are satisfied.
3. Player is prompted to submit identity verification documents via a secure verification interface.
4. Submitted documents are verified through an independent third-party KYC provider.
5. Verification outcome is reviewed automatically and, where required, manually by Compliance.
6. Account status is updated to one of the following:
 - Verified
 - Pending Compliance Review
 - Rejected / Suspended

No withdrawals are permitted until KYC verification is completed and approved.

2. Documents Required

Standard KYC (Mandatory for All Players)

- Government-issued photo identification:
 - Passport or
 - National Identity Card
- Live selfie / liveness check for biometric comparison

Additional Documents (Risk-Based)

- Proof of address (utility bill or bank statement issued within the last 3 months)
- Source of Funds (SOF) declaration where required

All documents must be valid, legible, and match the registered player information.

3. Verification Tools & Providers

Identity verification is performed using independent third-party KYC service providers approved by SDG Tech N.V. following due diligence.

Verification tools include:

- Document authenticity and forgery detection
- Facial recognition and liveness verification
- Sanctions and Politically Exposed Persons (PEP) screening
- Adverse media screening

Examples of approved KYC providers include Sumsub or equivalent providers subject to onboarding and contractual approval.

4. Risk Scoring & Player Classification

Each player is assigned a dynamic risk score based on automated system rules and manual compliance assessment. The risk scoring framework considers, at a minimum, the following criteria:

- Country of residence and IP geolocation
- Payment methods and funding sources used
- Transaction volume, velocity, and frequency
- Gameplay behavior and betting patterns
- Sanctions, Politically Exposed Person (PEP), and adverse media screening results

Risk Classification

Players are classified into the following risk categories:

- Low Risk – standard behavior, low transaction volume, no risk indicators
- Medium Risk – elevated transaction activity, cross-border payments, or minor behavioral anomalies
- High Risk – high-value transactions, rapid fund movements, high-risk jurisdictions, PEP matches, or AML system alerts

Risk scores are reviewed:

- Continuously through automated monitoring
- Manually upon alerts or periodic compliance review
- At minimum annually, or immediately upon material changes in player behavior

5. Enhanced Due Diligence (EDD) – Mandatory Triggers

Enhanced Due Diligence (EDD) is applied automatically or manually when one or more of the following conditions are met:

Mandatory EDD Triggers

- Player is identified as a Politically Exposed Person (PEP)
- Player is resident in, connected to, or transacting with high-risk or sanctioned jurisdictions
- Unusual transaction patterns, including but not limited to:
 - Rapid deposits and withdrawals
 - Structuring or repeated high-value transactions
- High transaction thresholds, including:
 - Cumulative deposits exceeding USD 10,000 within a rolling 30-day period, or equivalent
- Inconsistencies or discrepancies in submitted KYC documentation
- Alerts generated by AML monitoring systems or third-party providers

EDD Measures

EDD measures may include one or more of the following actions:

- Request for additional identification or source-of-funds documentation
- Manual compliance investigation and senior compliance approval
- Temporary transaction limits or account restrictions
- Temporary suspension of account activity pending investigation

Where suspicious activity cannot be reasonably explained, the matter is escalated internally and, where required, reported to the Curaçao Financial Intelligence Unit via NORUT / goAML, in accordance with applicable reporting obligations.

6. Ongoing Monitoring & Re-Verification

KYC compliance is subject to continuous monitoring.

Players may be required to undergo re-verification in the event of:

- Material changes in risk profile
- Significant increases in transaction volume
- Regulatory or compliance alerts

Records of all KYC checks are retained in accordance with data protection and regulatory requirements.

Games & Operational Scope

Overview of Gaming Products

SDG Tech N.V. operates an online gaming platform offering poker and casino gaming services, including RNG-based slot games and live dealer casino games. The platform is designed to provide a broad and diversified gaming portfolio while ensuring compliance with the regulatory, technical, and fairness requirements of the Curaçao Gaming Authority (CGA).

All games made available on the platform are supplied either through the Company's in-house poker system or by licensed third-party game providers whose products are independently certified and subject to ongoing compliance review.

Poker Games

The poker offering is operated through an in-house poker platform and includes commonly accepted international poker formats such as **Texas Hold'em (No-Limit Hold'em)** and **Pot-Limit Omaha**, offered in both cash game and tournament formats, including **Sit & Go** and **multi-table tournaments**.

Poker game outcomes are determined through a certified Random Number Generator (RNG). The poker system is tested prior to go-live and following any material system changes to ensure fairness, integrity, and compliance with applicable technical standards.

Casino Games

Slot Games

The casino offering includes a wide range of RNG-based slot games supplied by multiple established and licensed game providers. Slot content is sourced from providers including, but not limited to:

1spin4win, PlayAce, AvatarUX, Belatra, Betsoft, BGaming, Endorphina, Evoplay, Hanabero, JDB, JILI, Mancala, Microgaming, NetGame, OnlyPlay, Play'n GO, Playtech, Pragmatic Play, Relax Gaming, Spinomenal, Tom Horn Gaming, Yggdrasil (YGG), and YGR.

All slot games are supplied by providers whose products are independently certified by accredited testing laboratories and comply with applicable fairness and technical standards. Game availability may vary by jurisdiction and regulatory requirements.

Live Casino Games

Live dealer casino games are offered through licensed live casino studios and delivered via real-time video streaming. Live casino content includes standard table games such as roulette, blackjack, baccarat, and other live-hosted formats.

Live casino games are supplied by providers including **Pragmatic Play Live, PlayAce Live, Evolution, and Ezugi**. These providers operate certified live studios and systems that meet applicable regulatory and technical requirements.

Game Category	Provider	Certification Status
Casino – Slots	1spin4win	Certified
Casino – Slots	PlayAce	Certified
Casino – Slots	AvatarUX	Certified
Casino – Slots	Belatra	Certified
Casino – Slots	Betsoft	Certified
Casino – Slots	BGaming	Certified
Casino – Slots	Endorphina	Certified
Casino – Slots	Evoplay	Certified
Casino – Slots	Hanabero	Certified
Casino – Slots	JDB	Certified
Casino – Slots	JILI	Certified
Casino – Slots	Mancala	Certified
Casino – Slots	Microgaming	Certified
Casino – Slots	NetGame	Certified
Casino – Slots	OnlyPlay	Certified
Casino – Slots	Play’n GO	Certified

Casino – Slots	Playtech	Certified
Casino – Slots	Pragmatic Play	Certified
Casino – Slots	Relax Gaming	Certified
Casino – Slots	Spinomenal	Certified
Casino – Slots	Tom Horn Gaming	Certified
Casino – Slots	YGG (Yggdrasil)	Certified
Casino – Slots	YGR	Certified

Game Category	Provider	Certification Status
Live Casino	Pragmatic Live	Studio & RNG certified
Live Casino	PlayAce Live	Studio & RNG certified
Live Casino	Evolution	Studio & RNG certified
Live Casino	Ezugi	Studio & RNG certified

Return to Player (RTP) Disclosure Standards

Return to Player (RTP) values for casino games offered by SDG Tech N.V. are defined, configured, and certified by the respective game providers. RTP settings are embedded within the certified game logic and cannot be altered by the operator.

RTP information is clearly disclosed to players via in-game information panels, game detail pages, or provider-supplied disclosures, in accordance with Curaçao Gaming Authority transparency expectations. Any change to RTP configurations requires prior certification by an accredited independent testing laboratory and is subject to applicable regulatory approval requirements. SDG Tech N.V. does not deploy or modify any game version unless the certified RTP configuration is maintained.

Poker RTP is derived from rake and tournament fee structures, which are disclosed within the platform and applied consistently across all poker games and tournaments.

PSP & Third-Party Due Diligence Framework

Provider Type	Provider Name	Jurisdiction	Service	Due Diligence Performed
PSP	CoinPaid	Estonia	Crypto Payments	License review, KYC/AML policy review
PSP	PayCrypto	Malta	Fiat Payments	Regulatory status check, sanctions screening
Game Provider	SoftGaming	Malta	Aggregator	License verification, compliance review
ADR Provider	CADRE	Curaçao	Dispute Resolution	CGA-approved ADR

SDG Tech N.V. performs ongoing due diligence reviews at least annually and upon any material change in the service provider's licensing status, ownership, or risk profile.

Player Protection & Responsible Gaming Measures

RG Tool	Description
Deposit Limits	Daily / weekly / monthly limits configurable by player
Loss Limits	Player-defined maximum loss thresholds
Session Time Limits	Automatic session reminders and forced time-outs
Cooling-Off Period	Temporary suspension upon player request
Self-Exclusion	Voluntary self-exclusion (6 months / 12 months / permanent)
Reality Check	Periodic in-session notifications
Account History	Full access to betting and transaction history

All responsible gaming tools are mandatory and available to all players at all times.

Decreases to limits take effect immediately, while increases are subject to a cooling-off period of at least 24 hours.

Self-exclusion requests are irrevocable for the selected duration and enforced system-wide.

ADR & Complaint Management

1. Alternative Dispute Resolution (ADR)

In accordance with Curaçao Gaming Authority LOK Article 5.3, SDG Tech N.V. provides players with access to an independent Alternative Dispute Resolution (ADR) mechanism for unresolved complaints.

SDG Tech N.V. has appointed CADRE (Curaçao Alternative Dispute Resolution) as its ADR provider. The ADR provider operates independently from the Company and offers a fair, impartial, and transparent dispute resolution process.

Item	Description
ADR Provider	CADRE
Jurisdiction	Curaçao
Independence	Independent third-party organization
Cost to Player	Free of charge
Scope	Player complaints unresolved through internal process
Access Method	Via website link and contact details published in T&Cs

2. Player Complaints Handling Process

SDG Tech N.V. maintains a structured and transparent complaints handling procedure to ensure timely and fair resolution of player concerns.

Step	Description	Timeline
Step 1	Player submits complaint via support ticket or email	Day 0
Step 2	Initial review by Customer Support	Within 48 hours
Step 3	Escalation to Compliance Officer if unresolved	Within 7 days
Step 4	Final internal resolution provided	Within 14 days
Step 5	Referral to ADR provider (CADRE)	After 14 days if unresolved

3. Publication & Player Notification Commitments

SDG Tech N.V. is committed to transparency and ensures that all players are informed of their rights regarding complaints and dispute resolution. The following information is clearly published within the Company's Terms & Conditions and made accessible on the website:

- Description of the internal complaints handling process
- Expected resolution timelines
- ADR provider name and contact details
- Player right to escalate unresolved complaints to ADR
- Confirmation that ADR services are free of charge

Any material changes to the complaints handling process or ADR arrangements will be updated in the Terms & Conditions and communicated to players accordingly.

4. Governance & Oversight

The Compliance Officer is responsible for:

- Oversight of complaints handling procedures
- Ensuring adherence to regulatory timelines
- Liaison with the ADR provider when required
- Reporting material complaints to management and regulators where applicable

Financing

SDG Tech N.V. will operate with an initial capital injection provided solely by its shareholder(s). The initial paid-up capital of the company is USD 100,000, which will be fully allocated to support the lawful establishment, operation, and ongoing compliance of the company's online gaming platform under the Curaçao regulatory framework.

The company confirms that all funds originate from legitimate sources and are not derived from any illegal or prohibited activities. All financial activities will be conducted through regulated financial institutions and in full compliance with applicable AML/CFT regulations.

The initial funds will be utilized for the following purposes:

1. Platform Development & IT Infrastructure

A significant portion of the capital will be allocated to:

- Backend system development and maintenance
- Server hosting and cloud infrastructure
- Cybersecurity systems and data protection measures
- Integration of payment gateways and third-party gaming providers

2. Licensing & Regulatory Compliance

Funds will be used for:

- Curaçao gaming license application and annual renewal fees
- AML, KYC, and compliance system implementation
- External compliance consultancy and audit services

3. Operational Expenses

Including but not limited to:

- Staff salaries and professional service fees
- Customer support operations
- Office systems, software subscriptions, and administrative costs

4. Marketing & Business Development

A controlled portion of funds will be used for:

- Branding and digital marketing campaigns
- User acquisition and promotional activities
- Market expansion within permitted jurisdictions

5. Reserve & Risk Management Fund

A reserve fund will be maintained to:

- Cover unforeseen operational expenses
- Maintain financial stability and liquidity
- Mitigate business and regulatory risks

The initial operational capital of USD 100,000 is fully funded by the company's beneficial owner(s) through legitimate personal and business income. No public fundraising, crowdfunding, or third-party investment activities are currently involved.

The company does not accept deposits from players as operating capital. All player balances are segregated from company operational funds and are managed in accordance with applicable financial safeguarding requirements.

SDG Tech N.V. may consider additional shareholder capital injections in the future should business expansion require additional funding. Any future funding will comply with all applicable laws and regulatory requirements.

 Source of Funds Declaration (Shareholder)

Item	Description
Shareholder	Thiruchelvam Kalai Arasu
Amount	USD 100,000
Nature of Funds	Personal savings & retained business income
Source Jurisdiction	Malaysia
Method of Transfer	crypto
Third-party Funding	No
Loans / Debt	No
Gambling-derived Funds	No
Use of Funds	Operating capital for SDG Tech N.V

 Banking & Account Structure Overview

Account Type	Purpose	Currency	Status
Operating Account	Company operating expenses & revenues	USD	To be opened
Player Fund Account	Holding player balances	USD / Multi-currency	To be opened
Payment Gateway Settlement	Temporary settlement account	USD / Crypto	Via licensed PSP

SDG Tech N.V. maintains separate bank accounts for operating funds and player funds. Player funds are held in segregated accounts and are not commingled with company operating capital. The Company does not use player funds to finance operational expenses.

 2026 - Monthly P&L (USD)

Revenue	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Poker Rake &	18,000	18,900	19,800	20,700	21,600	22,500	23,400	24,300	25,200	26,100	27,000	27,900
Tournament Fees	8,000	8,400	8,800	9,200	9,600	10,000	10,400	10,800	11,200	11,600	12,000	12,400
Casino GGR	14,000	14,700	15,400	16,100	16,800	17,500	18,200	18,900	19,600	20,300	21,000	21,700
Total Revenue	40,000	42,000	44,000	46,000	48,000	50,000	52,000	54,000	56,000	58,000	60,000	62,000

Expense Item	Monthly
Platform & Hosting	7,000
Game Providers / Aggregator	6,000
Payment Processing	3,000
Marketing & Affiliates	6,000
Compliance & Licensing	2,000
Customer Support & Operations	4,000
Admin & Miscellaneous	2,000
Total Operating Expenses	30,000

 2027 - Monthly P&L (USD)

Revenue	Jan	Feb	Mar	Apr	May	Jun	Jul	Aug	Sep	Oct	Nov	Dec
Poker Rake &	29,250	30,600	31,950	33,300	34,650	36,000	37,350	38,700	40,050	41,400	42,750	45,000
Tournament Fees	13,000	13,600	14,200	14,800	15,400	16,000	16,600	17,200	17,800	18,400	19,000	20,000
Casino GGR	22,750	23,800	24,850	25,900	26,950	28,000	29,050	30,100	31,150	32,200	33,250	35,000
Total Revenue	65,000	68,000	71,000	74,000	77,000	80,000	83,000	86,000	89,000	92,000	95,000	100,000

Expense Item	Monthly
Platform & Hosting	9,000
Game Providers / Aggregator	8,000
Payment Processing	4,000
Marketing & Affiliates	10,000
Compliance & Licensing	3,000
Customer Support & Operations	6,000
Admin & Miscellaneous	4,000
Total Operating Expenses	44,000

 Cashflow Forecast - Year 1 (2026)

Month	Opening	Operating Inflow	Operating Outflow	Net Cashflow	Closing
Jan	100,000	40,000	(30,000)	10,000	110,000
Feb	110,000	42,000	(30,000)	12,000	122,000
Mar	122,000	44,000	(30,000)	14,000	136,000
Apr	136,000	46,000	(30,000)	16,000	152,000
May	152,000	48,000	(30,000)	18,000	170,000
Jun	170,000	50,000	(30,000)	20,000	190,000
Jul	190,000	52,000	(30,000)	22,000	212,000
Aug	212,000	54,000	(30,000)	24,000	236,000
Sep	236,000	56,000	(30,000)	26,000	262,000
Oct	262,000	58,000	(30,000)	28,000	290,000
Nov	290,000	60,000	(30,000)	30,000	320,000
Dec	320,000	62,000	(30,000)	32,000	352,000

The Company maintains positive operating cashflow throughout the 24-month forecast period. Initial capital of USD 100,000 is sufficient to support operations without liquidity stress.

 Cashflow Forecast - Year 1 (2027)

Month	Opening	Operating Inflow	Operating Outflow	Net Cashflow	Closing
Jan	352,000	65,000	(44,000)	21,000	373,000
Feb	373,000	68,000	(44,000)	24,000	397,000
Mar	397,000	71,000	(44,000)	27,000	424,000
Apr	424,000	74,000	(44,000)	30,000	454,000
May	454,000	77,000	(44,000)	33,000	487,000
Jun	487,000	80,000	(44,000)	36,000	523,000
Jul	523,000	83,000	(44,000)	39,000	562,000
Aug	562,000	86,000	(44,000)	42,000	604,000
Sep	604,000	89,000	(44,000)	45,000	649,000
Oct	649,000	92,000	(44,000)	48,000	697,000
Nov	697,000	95,000	(44,000)	51,000	748,000
Dec	748,000	100,000	(44,000)	56,000	804,000

The Company maintains positive operating cashflow throughout the 24-month forecast period. Initial capital of USD 100,000 is sufficient to support operations without liquidity stress.

 Capital Consumption Summary

Item	Amount
Initial Paid-in Capital	100,000
Avg Monthly OPEX (Year 1)	30,000
Avg Monthly OPEX (Year 2)	44,000
Peak Capital Utilization	~60,000
Break-even	Month 1
External Funding Required	No

 Capital Usage Timeline

Period	Capital Used	Remaining Buffer
Month 1	30,000	70,000
Month 3	60,000	40,000
Month 6	Self-funded	>100,000
Month 12	Profitable	>350,000
Month 24	Profitable	>800,000

Capital consumption remains conservative. The Company does not rely on player funds or external financing to meet operational requirements.

Player Fund Exposure Overview

Item	Year 1 (2026)	Year 2 (2027)
Avg Monthly Player	150,000	300,000
Peak Player Exposure	250,000	450,000
Player Fund Account	Segregated	Segregated
Operating Account	Separate	Separate
Use of Player Funds for OPEX	Not Allowed	Not Allowed
Reconciliation	Daily	Daily

Player funds are fully segregated from operational accounts and are not included in capital consumption, operating cashflow, or working capital calculations.

Player Fund Exposure Overview

Item	Year 1 (2026)	Year 2 (2027)
Avg Monthly Player	150,000	300,000
Peak Player Exposure	250,000	450,000
Player Fund Account	Segregated	Segregated
Operating Account	Separate	Separate
Use of Player Funds for	Not Allowed	Not Allowed
Reconciliation	Daily	Daily

Player Fund Protection Controls

Control	Description
Segregation	Separate trust / safeguarded account
Access	Restricted to authorized personnel
Monitoring	Daily reconciliation
Reporting	Internal audit & compliance review

Player funds are fully segregated from operational accounts and are not included in capital consumption, operating cashflow, or working capital calculations.

Player Funds vs Company Capital Separation

Category	Player Funds	Company Capital
Ownership	Players	SDG Tech N.V
Account Type	Segregated Trust	Operating Account
Used for OPEX	Not Allowed	Allowed
Included in Cashflow Forecast	No	Yes
Included in Capital Consumption	No	Yes
Reconciliation	Daily	Monthly
Regulatory Treatment	Protected Funds	Business Capital

Player funds are fully segregated from operational accounts and are not included in capital consumption, operating cashflow, or working capital calculations.

Governance Requirements

1. Board Governance Approach

SDG Tech N.V. adopts a formal governance framework designed to ensure effective oversight, regulatory compliance, and prudent risk management in accordance with the Curaçao Gaming Authority (CGA) Licensee Ordinance (LOK).

The Company operates under a two-tier governance structure comprising:

- Board-level oversight, responsible for strategic direction, regulatory accountability, and risk governance; and
- Executive management, responsible for day-to-day operations and implementation of approved policies and controls.

The Board of Directors retains ultimate responsibility for compliance with all applicable gaming, AML/CFT, and player protection obligations. Operational decision-making authority is delegated to executive management within defined limits approved by the Board.

The governance framework ensures:

- Clear segregation between oversight and execution
- Independent supervision of compliance-related matters
- Accountability for outsourced and third-party activities
- Transparent reporting to regulators where required

2. Board Composition

The Board of Directors of SDG Tech N.V. is composed of the following individuals and entities:

- **Ecorpp Management N.V.**
 - Role: Local Managing Director (Corporate Service Provider – Curaçao)
 - Responsibilities:
 - Statutory corporate governance
 - Regulatory liaison with the Curaçao Gaming Authority
 - Oversight of license conditions and CSP obligations
- **Thiruchelvam Kalai Arasu**
 - Roles: Executive Director, Chief Executive Officer (CEO), Chief Marketing Officer (CMO)
 - Responsibilities:
 - Overall business strategy and commercial direction
 - Product positioning, marketing, and player acquisition strategy
 - Executive accountability to the Board
- **Lee Men Sein**
 - Roles: Executive Director, Chief Operating Officer (COO), Chief Technology Officer (CTO)
 - Responsibilities:
 - Platform operations and technical infrastructure
 - IT security, system availability, and operational continuity
 - Oversight of game integrations and third-party technology providers

The Board meets as required to review strategic, operational, and compliance matters and maintains authority over all material decisions affecting the licensed operations.

3. Governance Responsibilities & Oversight

The Board of Directors is responsible for:

- Approving the Company's business strategy and risk appetite
- Oversight of AML/CFT, KYC, Responsible Gaming, and player protection frameworks
- Appointment and supervision of key control functions, including the Compliance Officer and MLRO
- Approval and periodic review of outsourcing and third-party arrangements
- Ensuring segregation and safeguarding of player funds
- Monitoring regulatory developments and ensuring timely compliance

Executive management is responsible for implementing Board-approved policies, maintaining internal controls, and reporting material issues or incidents to the Board without delay.

4. Reporting Lines & Accountability

- Executive management reports directly to the Board of Directors
- Compliance and AML matters are escalated to the Board where regulatory or material risk is identified
- Ecorpp Management N.V., as Local Managing Director, provides independent governance oversight and acts as the primary point of contact with the Curaçao Gaming Authority

This governance structure ensures that SDG Tech N.V. maintains effective control, transparency, and regulatory accountability throughout its licensed operations.

Internal Policies & Procedures

SDG Tech N.V. has adopted a comprehensive suite of internal policies and procedures designed to ensure compliance with the Curaçao Gaming Authority (CGA) Licensee Ordinance (LOK), applicable AML/CFT legislation, and international best practices for online gaming operations. All policies are approved by management, reviewed periodically, and made available to relevant staff and regulators upon request.

List of Internal Policies Maintained

The Company maintains, at a minimum, the following policies and procedures:

1. Anti-Money Laundering & Counter-Terrorist Financing (AML/CFT) Policy
2. Covers customer due diligence, transaction monitoring, suspicious activity reporting, and MLRO responsibilities.
3. Know Your Customer (KYC) & Customer Due Diligence Policy
4. Defines onboarding procedures, verification requirements, risk classification, and enhanced due diligence triggers.
5. Responsible Gaming (RG) Policy
6. Sets out player protection measures, limits, self-exclusion, time-outs, and responsible gambling communications.
7. Player Complaints & Dispute Resolution Policy
8. Governs internal complaint handling procedures and escalation to the approved ADR provider in accordance with LOK Article 5.3.
9. Player Funds Segregation & Safeguarding Policy
10. Ensures segregation of player funds from operational accounts and defines reconciliation and safeguarding controls.

- 11. Data Protection & Privacy Policy
- 12. Covers personal data handling, storage, access control, and retention in line with GDPR principles.
- 13. Information Security & IT Security Policy
- 14. Addresses system access control, encryption, incident response, and cybersecurity measures.
- 15. Risk Assessment & Risk Management Policy
- 16. Establishes the Company's risk-based approach to operational, financial, regulatory, and AML risks.
- 17. Outsourcing & Third-Party Management Policy
- 18. Governs selection, due diligence, monitoring, and oversight of third-party service providers.
- 19. Change Management Policy
- 20. Defines procedures for system changes, updates, testing, approvals, and rollback controls.
- 21. Business Continuity & Disaster Recovery Policy
- 22. Ensures operational resilience, backup procedures, and recovery time objectives.
- 23. Record Retention & Audit Trail Policy
- 24. Defines record-keeping requirements for transactions, player data, and compliance records.

All policies are subject to periodic review and updates to reflect regulatory developments and operational changes.

Outsourcing Statement

SDG Tech N.V. utilizes third-party service providers to support specific operational and technical functions while retaining full responsibility and accountability for compliance with CGA licensing requirements. Outsourcing arrangements do not transfer regulatory responsibility away from the Company.

Outsourced Functions

The following key functions are outsourced:

- Payment Processing (Fiat & Crypto)
- Game Content & Aggregation
- Cloud Hosting & Infrastructure
- Alternative Dispute Resolution (ADR)
- Customer Verification & AML Screening Tools

Third-Party Service Providers

The Company currently engages, or intends to engage, the following providers:

- Payment Service Providers (PSPs):
 - CoinPaid – Crypto payment processing
 - PayCrypto – Fiat and alternative payment solutions
- Game Providers / Aggregators:
 - SoftGaming – Game aggregation platform
 - Multiple certified game studios integrated via aggregator
- ADR Provider:
 - CADRE (Curaçao Alternative Dispute Resolution)
- Hosting Provider:
 - Amazon Web Services (AWS)

Oversight & Control Measures

To ensure effective oversight of outsourced functions, SDG Tech N.V. applies the following controls:

- Pre-engagement due diligence, including licensing and regulatory status checks
- Review of AML/CFT, data protection, and security policies of third parties
- Contractual obligations requiring compliance with applicable laws and CGA requirements
- Ongoing performance and compliance monitoring
- Right to audit or request compliance information where necessary
- Immediate escalation procedures for incidents, breaches, or regulatory concerns

Critical outsourced services are reviewed periodically to ensure continued suitability and compliance.

Accountability

SDG Tech N.V. remains fully accountable for:

- Regulatory compliance
- Player protection
- Safeguarding of player funds
- Data protection and security

Outsourced providers act solely as service providers and do not assume regulatory responsibility.

Statements

Risk Evaluation and Management for SDG Tech N.V.

At SDG Tech N.V., effective risk management is regarded as a core component of our governance and a prerequisite for maintaining a stable, compliant, and sustainable online poker operation under the Curaçao regulatory framework.

Our risk framework is designed to:

- identify and assess all material risks in a systematic way;
- define clear ownership and accountability for each risk;
- implement proportionate mitigation and control measures; and
- monitor, review, and improve these measures on an ongoing basis.

The framework covers regulatory, financial, operational, technical, and market-related risks across the full lifecycle of our activities, from player onboarding and payment processing to game operation, data management, and marketing.

1. Risk Assessment Framework

1.1 Risk Identification

We operate a structured and continuous process to identify risks arising from both internal and external environments. Inputs include management workshops, incident reports, control testing results, audit findings, regulatory updates, and monitoring of industry developments.

key risk categories include, but are not limited to:

- Regulatory Compliance Risk – Potential non-compliance with Curaçao licence conditions, AML/CFT requirements, responsible gaming regulations, advertising and marketing rules, and data-protection legislation in relevant jurisdictions.

- Cybersecurity and Data Protection Risk – Threats to the confidentiality, integrity, and availability of user data, financial information, and system assets due to cyberattacks, data breaches, or inadequate access controls.
- Financial and Liquidity Risk – Exposure to market volatility, funding constraints, payment-processor disruptions, or errors in financial processes which could affect the segregation and safety of player funds or the company's solvency.
- Operational Risk – Risks arising from internal processes, systems, and people, including human error, inadequate procedures, third-party failures, and insufficient business continuity arrangements.
- Fraud, AML and Player-Behavior Risk – Abuse of bonuses or promotions, multi-accounting, collusion at poker tables, chargebacks, and misuse of the platform for money-laundering or terrorist-financing purposes.
- Market and Business Risk – Changes in player preferences, competitive pressure, regulatory changes in target markets, or macroeconomic events impacting demand for online gaming services.

1.2 Risk Evaluation

Once identified, each risk is evaluated based on its likelihood of occurrence and impact on our business, players, and stakeholders.

We apply a documented Risk Matrix that categorizes:

- Likelihood: Rare, Unlikely, Possible, Likely, Almost Certain
- Impact: Negligible, Minor, Moderate, Major, Catastrophic

This evaluation enables SDG Tech N.V. to:

- prioritize high-impact / high-likelihood risks;
- determine which risks require immediate mitigation or escalation; and
- identify risks that can be accepted with ongoing monitoring under defined risk-appetite thresholds approved by the Board.

2. Risk Mitigation Strategies

2.1 Mitigation Plans

For each material risk, SDG Tech N.V. develops targeted mitigation plans with clearly defined controls, responsible owners, and monitoring routines.

Key elements of our mitigation approach include:

- Regulatory Compliance
- Maintaining close dialogue with local legal advisors and the Curaçao regulator.
- Implementing robust Know Your Customer (KYC) and Anti-Money Laundering (AML) procedures that meet or exceed license requirements.
- Embedding regulatory checks into operational workflows (e.g., player onboarding, withdrawals, marketing approvals).
- Cybersecurity
- Use of industry-standard encryption for all data in transit and at rest.
- Multi-factor authentication for privileged system access.
- Segregation of environments (development, testing, production) and strict change-management.
- Regular vulnerability scanning and penetration testing by qualified specialists, with remediation tracked to completion.
- Financial Risk Management
- Full segregation of player balances from operational funds, with dedicated accounts and daily reconciliation.
- Use of regulated payment service providers and clear withdrawal approval workflows.
- Forward-looking cash-flow planning and maintenance of liquidity buffers to meet player obligations at all times.

- Operational Risk Mitigation
- Documented standard operating procedures (SOPs) for key processes (KYC, payments, game operations, incident response).
- Role-based access control and four-eyes principles for sensitive activities.
- Staff training programs on compliance responsibilities, information-security awareness, and responsible-gaming handling.
- Fraud, AML and Player-Behavior Controls
- Automated transaction-monitoring rules to detect suspicious betting patterns, collusion, chip-dumping, and bonus abuse.
- Manual review workflows and escalation paths for flagged activity.
- Clear policies for account suspension, enhanced due diligence, and reporting of suspicious transactions to competent authorities where required.

2.2 Contingency and Business Continuity Planning

To prepare for unforeseen events, SDG Tech N.V. maintains:

- Business Continuity Plans (BCPs) that define critical functions, recovery priorities, and fallback arrangements in case of major systems outage or operational disruption.
- Disaster Recovery Plans (DRPs) for restoration of key systems and data from secure backups, including defined Recovery Time Objectives (RTOs) and Recovery Point Objectives (RPOs).

BCPs and DRPs are periodically reviewed, tested, and updated following changes in the technology stack, infrastructure, or risk profile.

3. Auditing and Oversight

3.1 Internal and External Audits

SDG Tech N.V. subjects its operations to structured internal and external assurance:

- Internal Audits
 - Conducted on a scheduled basis by an internal audit function independent from day-to-day operations.
 - Focus areas include effectiveness of controls around KYC/AML, payment processing, IT security, player-fund segregation, game operations, and compliance with internal policies.
 - Findings are documented, rated by severity, and assigned to responsible owners with agreed remediation timelines.
- External and Regulatory Audits
 - Independent audits may be conducted by external firms or mandated by the Curaçao regulator in relation to licensing obligations, financial reporting, and technical standards.
 - RNG certification and periodical re-certification are carried out by an accredited testing laboratory as required by the licence.
 - Where applicable, data-protection and AML reviews are performed to confirm adherence to relevant legal frameworks.

3.2 Audit Procedures

Audit procedures follow a documented methodology including planning, evidence collection, testing of controls, interviews with key staff, and validation of remediation.

Audit results and remediation status are reported to senior management and to the relevant board-level committee.

4. Governance and Oversight Committees

Strong governance ensures that risk management is embedded at the highest level.

- Board of Directors
- Holds ultimate responsibility for oversight of SDG Tech N.V.'s risk management framework.
- Approves the company's risk appetite and reviews key risk reports, audit findings, and remediation progress at regular intervals.
- Risk and Audit Committee
- Composed of directors and key executives (including, at minimum, the CEO, CFO, and Compliance representative).
- Meets regularly to:
 - review internal and external audit results;
 - evaluate the effectiveness of mitigation measures;
 - monitor high-priority risks and incidents;
 - escalate any significant issues to the full Board.
- Compliance Committee
- Oversees day-to-day regulatory compliance across all operational areas.
- Monitors adherence to gaming regulations, AML/CFT standards, responsible-gaming requirements, and data-protection obligations.
- Coordinates policy updates, staff training, and regulatory reporting to ensure SDG Tech N.V. remains a responsible and trustworthy licensee.

5. Risk Register and Action Plans

5.1 Risk Register

SDG Tech N.V. maintains a central Risk Register that records:

- all identified material risks;
- their likelihood and impact ratings;
- existing controls and residual-risk evaluations;
- designated risk owners and escalation paths.

The register is a living document, updated whenever new risks emerge, existing risks change, or significant incidents occur. It serves as the primary reference for management and committees when reviewing the risk profile.

5.2 Action Plans

For each high-priority risk, we develop detailed Action Plans which specify:

- concrete mitigation or remediation tasks;
- accountable owners and supporting teams;
- target completion dates and success criteria.

Progress against action plans is monitored by the Risk and Audit Committee, with summary status reports submitted to the Board to ensure timely resolution of significant issues.

6. Continuous Improvement

Risk management at SDG Tech N.V. is treated as an ongoing, iterative process rather than a one-time exercise. To support continuous improvement, we:

- systematically incorporate lessons learned from incidents, near-misses, and audits into updated controls and procedures;
- conduct regular training and awareness programs for all staff, tailored to their roles and risk responsibilities;
- benchmark our practices against industry standards and evolving regulatory expectations;
- actively seek feedback from regulators, auditors, advisors, and key partners to refine our risk framework.

Conclusion

Through this structured risk-evaluation and management framework, SDG Tech N.V. aims to ensure that all material risks associated with its online poker operations are identified, assessed, mitigated, and monitored in a transparent and disciplined manner.

This approach supports our objectives of:

- protecting players and safeguarding their funds;
- maintaining full compliance with Curaçao licensing requirements; and
- operating a secure, resilient, and sustainable business in the highly regulated iGaming environment.