

Business Model

The current aim of 4AM QTF (hereafter: the "Company") is to facilitate a very small group of VIP players, (called Account holders) to Pari Mutuel wagering on Hong Kong horse racing. In principle this comes down to high frequency betting using mathematical models. For your reference - Licensed operators in Curacao operating a similar business are for example The Elite Turf Club. It is envisaged at the outset to facilitate wagering to one client who is already known to the Curacao license holder and UBO. This will provide further proof of concept.

Acceptance and AML

It is envisaged that the Company and its UBO will have personal contact with the Account Holders to establish the KYC.

The services of the Company are set up in such a way that an extensive backgroup check is done prior to accepting the Account Holder. Furthermore, there is a risk review cycle whereby all Account Holders are being checked every six months by a specialized third party, who uses numerous compliance tools to screen the specific Account Holder. The background check includes, but is not limited to, the following: verification of address, residency, and social security number (or applicable foreign ID number); inspection of public records (i.e. criminal records, sanction lists, etc.) verification of good standing, thus checks against OFAC matters, US terrorism watch lists, amongst others and banking sanctions.

Account holders are screened against specific lists if their country of residence or the country of employment indicates the need to consult applicable lists with relation to banking sanctions, terrorism watch lists and any criminal activities. These detailed risk assessments form part of each Account holder file.

Once such Account holder become an account holder of the Company, they enter pari-mutuel pools. This means that the Account Holders wage against each other and other pari-mutuel players instead of against the Company. Do note that as the Account holders wager against each other and other pari-mutuel players, the amount of deposit that the Company receives are quite limited, whereby the Company only accepts payment via controlled manners, such as wire-transfers. This is done as an additional safeguard, as these wire transfers are then executed via reputable financial institutions. Wholesale access contracts to the wagering pools are only awarded to entities with a gaming license.

All the Account Holders are well known to the Company and the Company is very reserved with accepting new Account Holders.

The proposed Curacao license holder (proposed) has over 20 years experience in this space.

Settlements are made either to the contracted racetrack, when the client loses (in this instance the HKJC) or from the contracted racetrack, when the client wins. All these transactions will flow through our bank in London which is also carrying out legal analysis and extensive due diligence.

The Company has full-time employees around the world who service the Account Holders, monitor wagering activity (which includes generating daily reports) and are available during racing hours to troubleshoot various technical and operational issue.

In addition to day-to-day transaction monitoring performed by the employees of the Company (in accordance with their AML Manual and reinforced through the Company its Training Program), the MLRO of the Company will also receive every month a summary of all incoming and outgoing transactions between the Company and the Account Holder. The MLRO will review these summaries in accordance with the industry best practices existing at that time, for the purpose of uncovering any suspicious activity. Among the tools at the Company's disposal when conducting this review are the Transaction Risk Assessment Form and Risk Mapping Matrix. In addition to the monthly review, random audits of Account Holder transactions may be initiated by the MLRO.

Based on the set-up of the Company, the interaction between the Company and the Account Holders and the extensive background checks and reviews that are being done, the Company is very familiar with the Account Holders.

We hope to have informed you adequately. In case of any queries, please do not hesitate to reach out to us.

C. Drommond

eMoore N.V. as Director

Executed by C. Drommond as Proxy Holder

24/10/2025

