

		Location	Checked	Instructions	Comments
cs	Corporate Structure				
1.	Start up / New company	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao.</i>	4.4.2022 BCIF Q7 indicates the company as a start up/new operation A CL was raised, to which the applicant replied: Question 7: Answer: The company recently obtained a new URL, which is not yet operational. For this reason, the startup option was selected The company is also found in sub license registry.
BCIF	Existing operating company holding sub license	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao. If you notice that the company is Tier 1 (known) company please make a note.</i>	Cyberluck, 2 domains removed on 27.6.2025
	GoAML				BCIF: Yes Uncertified FIUC screen shot submitted

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	Check if any person is already approved under other applications. If missing information check Business Plan and Q 12 BCIF		Y	<i>List Approved People with their QPATE</i>	Stefanie Knoester and Jarid Vivas as reps of eMoore CO Deborah McKenzie, sat on a total of 12 and currently on 10 applications (is currently at maximum) UBO: Jae Hong Kim BCIF and business plan align
e	Updated company structure diagram showing equity and control percentages, signed by a company director of the applicant company.	BCI 10.1	Y	<i>Must be dated within the last 3 months of submission. Check Director with submission CS.3</i>	Yes
CS.1.3	Shows Control Percentage		Y		Yes
CS.1.4	Equity Adds Up		Y	<i>Remark if there are minority shareholders.</i>	yes
CS.2.1	Share ledger of the applicant company including companies holding 10% or more shareholding in the applicant company and all persons holding 10% or more shareholding in the applicant company. (Ultimate Beneficiary Owners) or trust deed.	BCI 10.2	Y	<i>Make sure share ledger lists all involved parties . Request trust deed.</i>	Yes
	Calculate all percentages equal to or more to ten percent.		Y		Yes

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	List all Companies in Share Ledger of the applicant company					Y		
	% share	Company Name.	Company Reg. No	Country	BCI 10.2	Y	List all companies having 10% or more shareholding here. If no companies are involved then delete this section.	
	100	Bspoon Holdings Limited	HW 431634	Cyprus		Y		
CS 2.2	External Sources Verification		NorthData				Using the external reference sources to verify company structure. Use country specific company registries to trace more information on the company.	Company verified on the Cyprus Registry: BSPOON HOLDINGS LTD Als, DR and SL submitted, duly certified. The sole director is Jae Hong Kim.
ICIJ								
Lexis Nexis								
AMLRISK								
LinkedIn								
Address (Google Maps)								
CS.2.3	List all persons in Share Ledger over 10% -				BCI 10.2	Y	There has to be at least one UBO. All UBOs of companies with controlling interest must be listed. This section is linked to BC.	
	Company Belonging to:	Full Name	Passport Number	Country of Issue				
100	BSpoon Holdings Limited	Jae Hong Kim	M984M8097	Republic of Korea		Y		Q32: Answered ‘Yes’. Offence history: Causing bodily injury to another person in violation of the special actin traffic accident treatment ,on the 12.1.2020, with the result being ‘suspension of prosecution (No conviction)

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								Declared to be self-employed as CEO of OzLabs Inc since 1.8.2021 and was a director of a gaming company, Netmarble, from 2019-1.7.2025 He declared an annual income of USD 40,000 and a net worth of USD 450,000 acquired through savings from employment income SOW submitted: - Property Transaction Contract Report Completion Certificate, dated 26.7.22 showing the UBO as a buyer, of a land in Seoul, of 218m(2) for the amount of won 640,000,000 (circa Eur 366,000) - A real estate ownership status,

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								showing UBO as registered owner of land in point 1) 3. A certified of income for Tax year 2024, wherein UBO declared total amount received from OzLabs WON 51,600,000 (Circa Eur 29500) and amount of income: won 39,270,000 (circa Eur 22,500); and another for 2003 showing amount of income of circa Eur 19,200) 4. A certificate of account balance dated 23.10.2025,

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								showing a balance of USD 77,576.09 with 'no attachment and pledge applicable' 5. A certificate of employment, indicating the UBO employed as a CEO in OzLabs Inc since 1.8.2021 to present (dated 3.3.2026) Note: SOW of UBO submitted aligns with the UBO's declarations on annual income and net worth. Financial position appears to be weak; with the majority of his net wealth dependent upon his immovable property; The losses of OzLabs Inc, also makes it questionable how it could provide and support a Eur 500,000 loan to the applicant company. In the event of any

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								shortfall, no liquid assets to make good have been proven.
	External Sources Verification	NorthData	X				Using the external reference sources to verify company UBO are involved in other gaming companies or business. Also remark if we suspect that this is a shadow UBO.	LN searches done for the applicant company, holding company and Ozlabs. No results found Jae Hong Kim, Cyprus Jae Hong Kim, Preston (unverified) Bspoon Holdings Ltd., Nicosia, Cyprus, MCIT HE 431634: Network, Financial information
		ICIJ	X					
		PRADO						
		Lexis Nexis						
		AMLRISK	x					
		LinkedIn	-					
		Onfido						
		Address (Google Maps)						
2.4	SOW declaration including supporting documents				Check question 1	Y	Insufficient documentation – send a ticket	
	SOF for new companies and reactivating companies					Y	In the event of insufficient funding a ticket is sent for clarification.	Q8BCIF(bank account), Applicant replied ‘Pendihng CGA License to get the bank account opened

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					Q9 BCIF (Wallets):: Applicant replied: The company does not currently own or operate any virtual assets. However, we plan to set this up Q11 (On the most recent and approved BCIF) : Loans by shareholders in the amount of Eur 500,000 (Note: The credit was actually provided by a company which the UBO appears to own the majority of shares in and in which he is the sole representative) (Valid) SOF documents submitted: A certificate of business registration showing the UBO as 'sole representation' of OzLabs Inc, as well as a translate shareholder's register of Ozlabs Co lts, showing the UBO as an 83% shareholder, together with 3 other minority shareholders. A certified credit facility agreement, dated 26.3.2026 between OzlabsInc as the lender and Bettingspoon BV as

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					the Borrower, for the amount of USD 500,000, with a 5% interest rate, with the 31.3.2028 being the maturity date. A certificate of standard financial statements for OzLabs Inc, as of 12.31.2025, wherein a standard balance sheet showed current assets of KRW 26, 435,440 (circa Eur 15,100) of which circa 2.7m(Circa Eur 1544) are cash and cash equivalents. Total liabilities amount to KRW 2,158.659. 860 (circa Eur 1.2m) of which short term borrowings are 1,769,713,984 (circa Eur 1m) with a negative retained earnings of 1,258.492,490 (circa Eur 720,000) The year resulted in a net loss of

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					102,996,392 (circa Eur 60,000) Note: Updated financial figures for the first quarter for 2026 are required, wherein the loan was granted. The company does not appear financially sound to enter into such a loan agreement as at 31..12.2025 FS 2022 of the applicant company, showing a net loss of Eur 30,964. The company did not generate any income. Was in start up year, and likely not trading as yet – does not

		Location	Checked	Instructions	Comments
					provide sufficient financial data for review. A CL was raised requesting fs 2023,2024 and financials 2025, to which the applicant replied: The 2022 financial statements are the latest approved FS. We are currently working on the 2023 Financial Statements and will submit the same as soon as these have been finalized. FS 2023 were submitted, which shows a

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					net loss of Eur 75,807, with a payable to related parties of Eur 125,831 and an accumulated deficit of Eur 30,964 FS 2024 were also submitted, which show a net loss of Eur 7304, with a payable to related parties of Eu 125,831
	Verify objects of the company are for gaming	AI	Y		Yes
	Certificate of Good Standing (for tax purposes)			\	No. This is a mandatory requirement. A CL was raised, to which the applicant replied: The debtor's list has been re-uploaded on this section. At this time, we

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					are unable to provide the Declaration of Good standing as the Financial statements 2023 and 2024 have just been finalized . Consequently we will now arrange for the respective tax filings with the Tax Authorities. Therefore, we are not able to receive nor submit the declaration of good standing yet. As soon as this process have been completed with the tax authority, we will submit the declaration.

		Location	Checked	Instructions	Comments
					<u>[Sent by Jared Vivas - 08-05-2026 15:37]</u>
					<u>[Sent by George Van Zinnicq Bergmann - 20-04-2026 14:41]</u>
					The debtor's list has been uploaded on this section. At this time, we are unable to provide the Declaration of Good standing as the Financial statements are still in preparation following the recent acquisition of the company and the request with the Tax Authorities can

							Location	Checked	Instructions	Comments															
										not be finalized until these have been completed.															
	Ensure board management requirements are met							Y	Check voting rights and appointment.	Yes. One or more managing directors															
CS 3.4	Articles of .Incorporation of companies holding 10% or more shareholding in the applicant company:							Y																	
	%	Company Name		Company Reg. No		Country	BCI 10.3	Y	Replicate 3.4. and 3.4. 1 for every company																
								Y																	
CS 3.4.1	External Sources Verification		<table border="1"> <tr><td>NorthData</td><td></td></tr> <tr><td>ICIJ</td><td></td></tr> <tr><td>PRADO</td><td></td></tr> <tr><td>Lexis Nexis</td><td></td></tr> <tr><td>AMLRISK</td><td></td></tr> <tr><td>LinkedIn</td><td></td></tr> <tr><td>Address (Google Maps)</td><td></td></tr> </table>		NorthData		ICIJ		PRADO		Lexis Nexis		AMLRISK		LinkedIn		Address (Google Maps)							For each company verify links and registrations	
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CS.4.1	Directors list for the applicant company including companies holding 10% or more shareholding in the applicant company.						BCI 10.3																		
	Company	VP	ST	Full Name	Passport Number	Country of Issue	AI		Lis all Directors. Check VP if director has voting powers. ST if it has statutory powers. Check with CS 3.4 above																

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							Y																	
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CS.4.2	Managing Directors as Official Representatives						BCI 10.3																	
	Trust Company	Full Name		Passport Number			AI		List all Managing Directors. Check VP. Must at least have one.															
	eMoore N.V			Co Reg 98108				Y		Sole director Verified www2.curacao-chamber.com/excerpt.asp														
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CLs to be raised:

1. To obtain signed financials in whatever form, of the applicant company, for year 2025
2. To request again, the declaration of good standing - Requested
3. Query: Given the 2025 net loss and financials of Ozlabs Inc and the SOW evidenced by the UBO, from where will the funds for the loan emerge? In the event of a shortfall, who will support the loan and the business?
4. Certify GoAML registration.