

OPERATIONAL MANUAL

Deep Dive Tech BV

Curaçao Gaming Control Board (GCB)

Company Name

License Type

Company Registration No

Registered Office

Deep Dive Tech B.V.

Curaçao Gaming License (issued under the
authority of the GCB)

154314

Fransche Bloemweg 4, Curacao

Contents

1. INTRODUCTION	3
1.1. Purpose of the Manual	3
1.2. Company Overview	3
2. CORPORATE GOVERNANCE & ORGANIZATIONAL STRUCTURE	4
3. GAMING OPERATIONS	5
3.1. Game Portfolio Overview	5
3.2. Game Fairness, Rules, and Player Information	5
3.3. Payout Structures and Betting Limits	6
3.4. Game Release and Version Control	7
4. PLAYER ACCOUNT MANAGEMENT	7
4.1. Registration Process	7
4.2. Know Your Customer (KYC) and Verification	8
4.3. Account Security and Data Protection	8
5. AML/CFT FRAMEWORK	9
5.1. Legal and Regulatory Context	9
5.2. Customer Due Diligence (CDD)	9
5.3. Transaction Monitoring	10
5.4. Record Retention and Confidentiality	10
5.5. AML/CFT Training	11
6. RESPONSIBLE GAMING & SOCIAL RESPONSIBILITY	11
6.1. Overview	11
6.2. Player Protection Tools	11
6.3. Player Information & Help Resources	12
6.4. Prevention of Underage Gambling	14
6.5. Detection and intervention	15
6.6. Staff Training and Awareness	15
7. INFORMATION SECURITY & DATA PROTECTION	16
7.1. Security Framework	16
7.2. Incident Management	16
8. SUPPORTING POLICIES SUMMARY	16
9. DECLARATION	17

1. INTRODUCTION

1.1. Purpose of the Manual

This Operational Manual describes the operational, compliance, and control frameworks implemented by Deep Dive Tech B.V., in alignment with the requirements of the Curaçao Gaming Control Board (GCB).

It presents the company's structure, policies, and technical and procedural safeguards that ensure integrity, player protection, and full regulatory compliance under Curaçao's legal framework; specifically, the National Ordinance on the Prevention and Combating of Money Laundering and Terrorist Financing (NORUT), the National Ordinance on Identification when Rendering Services (NOIS), and the GCB AML/CFT and Player Protection Guidelines.

The manual demonstrates Deep Dive Tech B.V.'s commitment to maintaining a fair, responsible, and secure gaming environment through proper governance, clear internal controls, and transparent operations.

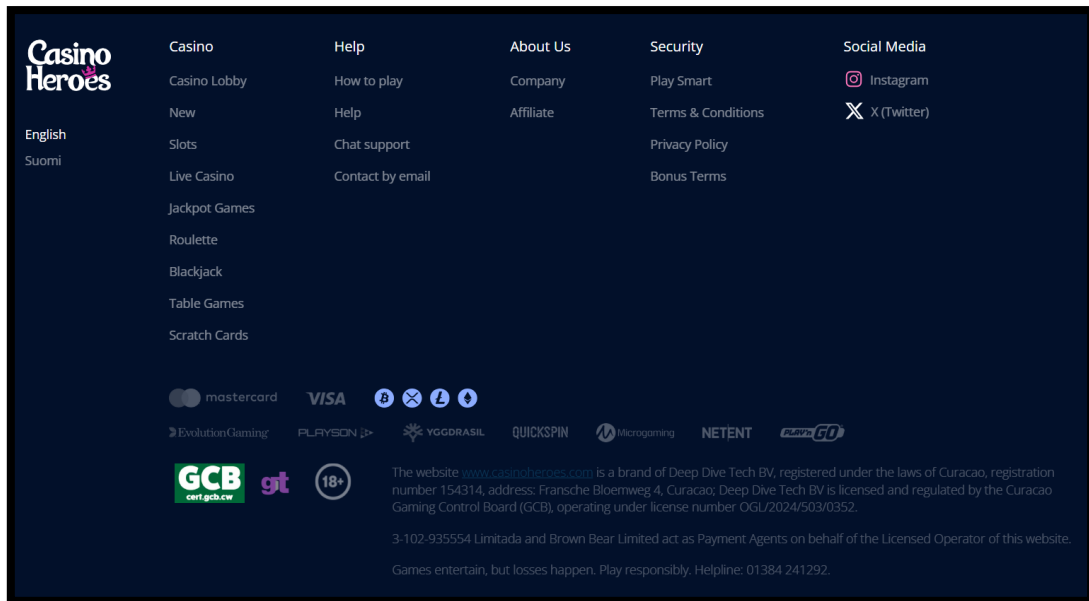
1.2. Company Overview

Deep Dive Tech B.V. is a Curaçao-registered entity operating under a Curaçao gaming license issued by the Curaçao Gaming Control Board (GCB).

The company offers a range of licensed online casino products including slot games, live dealer tables and sports betting through its gaming platform. Operations currently target players in Finland, with expansion plans subject to regulatory approval.

Deep Dive Tech B.V. adheres to the following guiding principles:

- Operate with honesty, transparency, and fairness.
- Prevent underage or irresponsible gambling.
- Detect and deter money-laundering and terrorism-financing risks.
- Protect player information and ensure data security.
- Maintain continuous compliance with Curaçao's legal obligations.



2. CORPORATE GOVERNANCE & ORGANIZATIONAL STRUCTURE

Deep Dive Tech B.V. maintains a defined management structure that supports accountability, transparency, and effective oversight. Each department operates within clearly documented lines of responsibility to ensure that operational and compliance obligations are met. Some of these key positions are as follows:

Role	Name	Key Responsibilities
Chief Operating Officer (COO)	Andreas Dahl	Oversees daily operations, manages game integrations, provider relations, and ensures platform stability and fair play.
Chief Financial Officer (CFO)	Eleazer Borg Calleja	Supervises all financial functions including reconciliations, cash-flow control, and financial compliance reporting.
Chief Technology Officer (CTO)	Dmytro Strumilenko	Responsible for IT infrastructure, cybersecurity, data management, and disaster-recovery planning.
Compliance Officer & MLRO	Mark Taylor	Implements AML/CFT framework, monitors player transactions, files reports to the FIU Curaçao.
Responsible Gaming Manager	Valentina Pirnau	Ensures responsible gaming tools and procedures are active, manages player interventions, and staff RG training.

The governance structure encourages close collaboration between the Compliance, Operations, and Customer Support divisions, ensuring timely reporting, effective controls, and alignment with GCB expectations.

3. GAMING OPERATIONS

3.1. Game Portfolio Overview

Deep Dive Tech B.V. partners exclusively with licensed and reputable providers to deliver a secure and diverse gaming environment.

All games are certified by recognized testing laboratories (e.g., GLI, iTech Labs, BMM Testlabs) ensuring compliance with fair-play standards and accurate RTP values.

The company currently collaborates with:

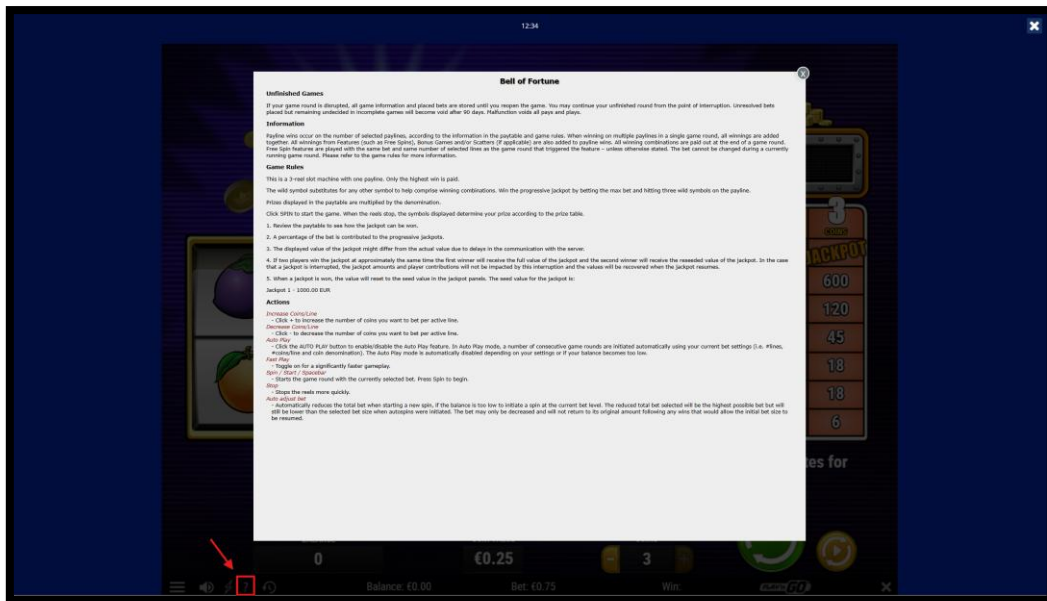
Provider	Jurisdiction/License	Certification Body
Hub88 International B.V.	Curaçao	iTech Labs
Evolution Gaming	Malta	GLI
Yggdrasil Gaming Ltd	Malta	BMM Testlabs
Play'n GO Malta Limited	Malta	iTech Labs
N2 Digital Technologies Limited	Curaçao	GLI
Gameshop Limited (Octoplay)	Malta	iTech Labs
Earlybird Ltd (Betby)	Lithuania	BMM Testlabs
Slotegrator	Cyprus	GLI
PragmaticPlay Limited	Malta	BMM Testlabs

3.2. Game Fairness, Rules, and Player Information

Each game includes a dedicated Information Panel accessible from within the interface. This section explains gameplay mechanics, RTP percentage, volatility, bonus features, and payable details.

Prior to gameplay, the player can view:

- “How to Play” instructions explaining betting options and win combinations.
- Theoretical RTP percentages, typically ranging from 94 % – 98 %.
- Minimum and maximum wagers.
- Information about jackpots, bonuses, and game version.

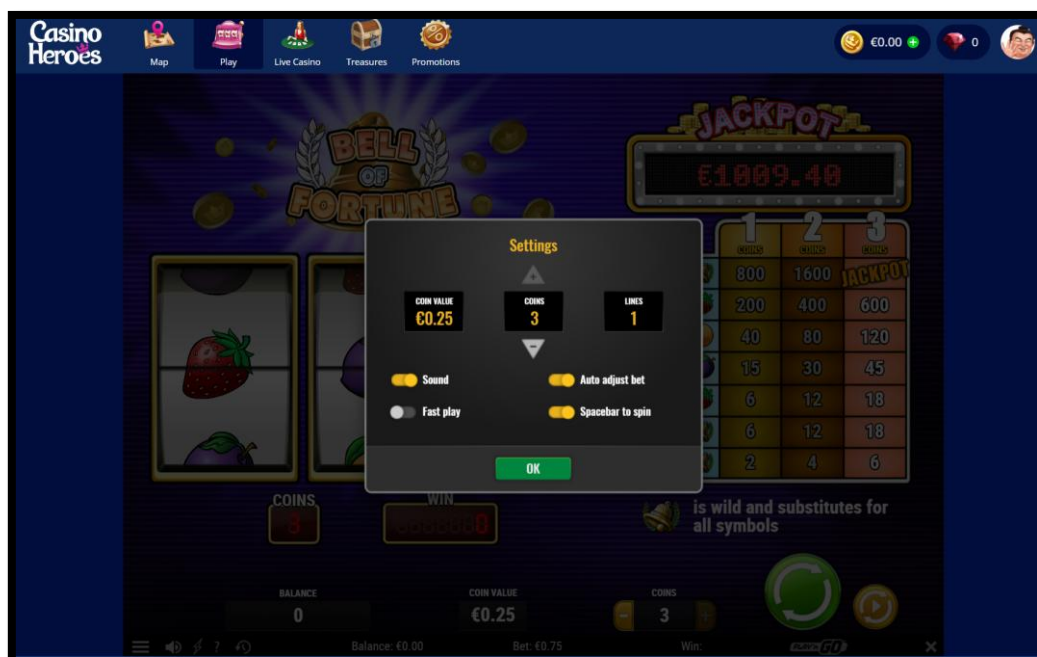


Game outcomes are determined exclusively by certified RNG software; neither players nor Deep Dive Tech B.V. staff can influence results.

3.3. Payout Structures and Betting Limits

All games operate within predefined betting parameters:

- Minimum Bet: € 0.10 (or equivalent in other currencies).
- Maximum Bet: Typically, up to € 100 per spin or hand.
- Jackpot Contributions: Where applicable, clearly displayed within the game.



Balances, wagers, and winnings are visible in real-time. RTP data is verified periodically by the Compliance team against provider documentation.



3.4. Game Release and Version Control

Before a new game is released, the COO and CTO review the provider's certificate, verify correct display of RTP and rules, and test integration stability. Any update or modification triggers re-testing to ensure compliance.

4. PLAYER ACCOUNT MANAGEMENT

4.1. Registration Process

Deep Dive Tech B.V. operates under a Pay and Play registration model, allowing players to create and verify their accounts instantly through a secure online banking identification process. This method enables immediate access to gaming services while ensuring that player identity verification and payment authentication occur simultaneously and in full compliance with Curaçao's KYC and AML requirements.

When a player initiates gameplay or a deposit, the integrated payment identification system retrieves verified information directly from the player's financial institution.

The data received includes:

- Full legal name
- Date of birth
- Residential address
- Verified bank account details
- Contact information (email or mobile number)

This automated process eliminates the need for traditional manual registration forms and ensures that only verified individuals can access the platform.

Before completing the initial deposit and account activation, each player must actively confirm that they have read, understood, and agreed to the Terms & Conditions and Privacy Policy.

The system automatically prevents access by anyone under the age of 18, as the identity and age are verified in real time through the banking authentication process. Any attempt by a minor to register or deposit is automatically rejected.

All personal and transactional data obtained during registration are securely transmitted using encrypted channels and stored in accordance with Curaçao's NOIS and NORUT requirements for identification, data protection, and record retention. age.

4.2. Know Your Customer (KYC) and Verification

Identity verification is conducted through a combination of automated and manual methods. Deep Dive Tech B.V. employs the third-party providers Shufti Pro Ltd for KYC document verification and SEON for ongoing transaction monitoring and risk scoring.

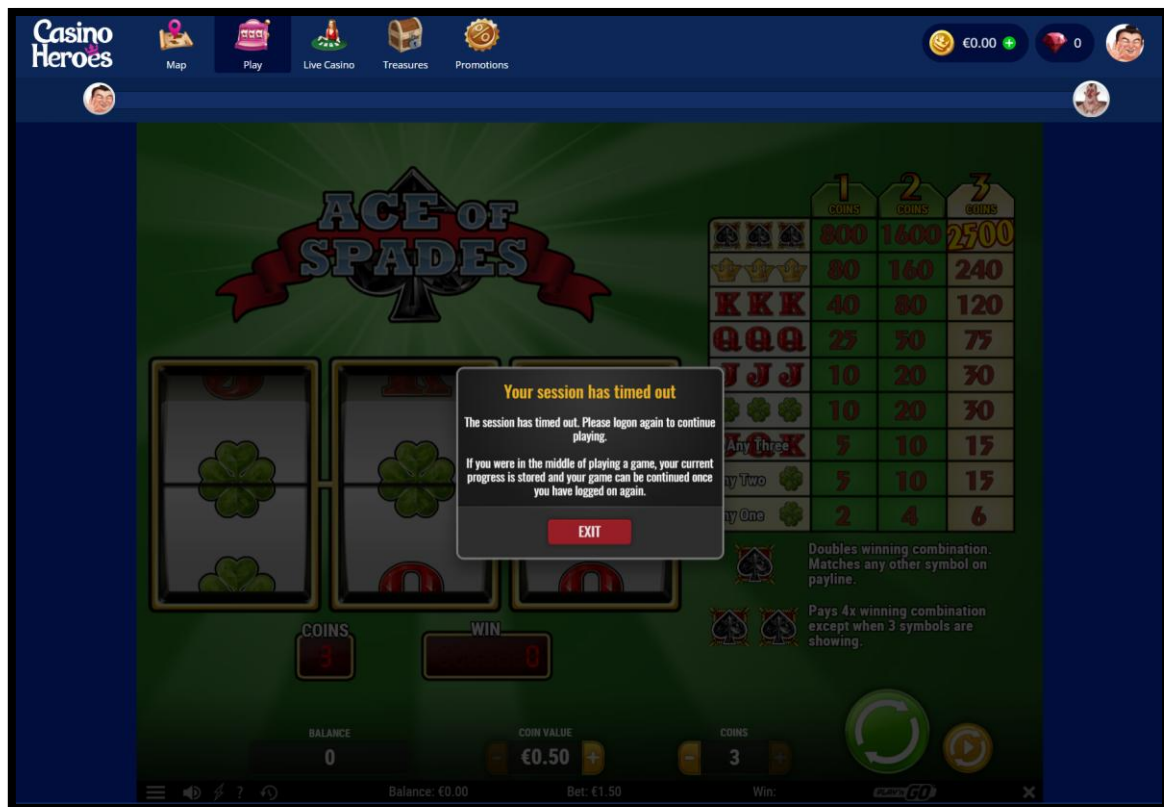
Verification process:

1. Document Submission: Players upload photo ID and proof of address.
2. Automated Check: Shufti Pro verifies authenticity and expiration of the document.
3. Manual Review: Conducted by Customer Support Team when automation yields uncertainty.
4. High-Risk Handling: PEPs or individuals flagged under sanctions screening are not accepted due to elevated risk.

4.3. Account Security and Data Protection

All communication between the player and platform is encrypted using SSL/TLS. The platform enforces strong password requirements.

User accounts are locked after several failed login attempts, and sessions automatically expire after periods of inactivity.



Personal data is processed only for legitimate gaming and compliance purposes and is never shared with third parties except as legally required.

5. AML/CFT FRAMEWORK

5.1. Legal and Regulatory Context

Deep Dive Tech B.V. fully complies with Curaçao's AML/CFT obligations under NORUT and NOIS, as well as the GCB's 2024 AML Guidance. The company is registered with and reports suspicious activity to the Financial Intelligence Unit (FIU Curaçao).

5.2. Customer Due Diligence (CDD)

Deep Dive Tech B.V. applies a risk-based approach to Customer Due Diligence (CDD), ensuring that every player's identity and financial activity are verified in accordance with Curaçao's NORUT and NOIS obligations.

Under the company's Pay and Play operational model, player identity verification takes place automatically through secure online banking authentication at the time of the first deposit. This process confirms the player's identity and financial ownership in real time, effectively establishing CDD at the very start of the business relationship.

This ensures that all customers are verified before any gaming or transactional activity occurs.

CDD is additionally performed or reviewed when:

- Conducting a transaction equal to or exceeding ANG 4,000 (objective indicator),
- There are doubts regarding the authenticity or completeness of identification data,
- The player's behaviour, deposits, or withdrawals raise suspicion of financial crime or misuse of the platform.

Enhanced Due Diligence (EDD) is applied to customers considered higher-risk, such as those with complex transaction patterns, high turnover behaviour, or foreign financial connections.

Players identified as Politically Exposed Persons (PEPs) or found on sanctions lists are not accepted due to elevated compliance risks. Where necessary, manual verification and document review are conducted by the Compliance team to supplement the automated verification process.

5.3. Transaction Monitoring

All financial activity is continuously monitored using SEON, which evaluates player deposits, withdrawals, and gameplay patterns for anomalies. Transactions triggering red flags (e.g., rapid deposit-withdrawal cycles, mismatched details, or third-party funding) are manually reviewed and escalated to the MLRO if needed.

If suspicion persists, a Suspicious Transaction Report (STR) is filed electronically to FIU Curaçao.

5.4. Record Retention and Confidentiality

All KYC documents, verification results, transaction logs, and STRs are retained for at least six (6) years after the end of the player relationship, in line with NOIS obligations. Access is limited to authorized compliance personnel.

5.5. AML/CFT Training

All employees receive mandatory AML training at onboarding and annually thereafter. The program covers Curaçao legislation, typologies, red-flag indicators, and proper escalation procedures. Attendance is recorded and made available to auditors.

6. RESPONSIBLE GAMING & SOCIAL RESPONSIBILITY

6.1. Overview

Deep Dive Tech B.V. is firmly committed to responsible gambling and the protection of vulnerable individuals. The Responsible Gaming framework integrates controls, education, and proactive intervention, reflecting GCB standards and industry best practice.

6.2. Player Protection Tools

Players can manage their own gaming behaviour using built-in self-management tools available through their account dashboard:

- Deposit Limits: Set per day, week, or month to control spending.
- Loss Limits: Restrict cumulative losses during chosen timeframes.
- Wager Limits: Cap total bets per period.
- Reality Check: On-screen pop-ups reminding players of session duration and total wagers.
- Self-Exclusion: Enables players to block access temporarily or permanently.

All limits take effect immediately upon confirmation.

Casino Heroes | Map | Play | Live Casino | Treasures | Promotions | €0.00 | 0 | [Avatar]

Money Limits | Reality Check | Time Out | Self-exclusion

Deposit Limit

Control your deposit amount over a specific period of time. This will help you limit your payments, as you will not be able to exceed the limit until the limit has been reset. Keep in mind that, regardless if you wish to increase or revoke your limit, the process will take 1 days. Daily means 00:00-23:59, Weekly means Monday-Sunday, and Monthly equals the time period starting with the 1st and ending with the last day of the month.

DAILY	WEEKLY	MONTHLY
€ Amount	€ Amount	€ Amount
Confirm	Confirm	Confirm

Wager Limit

Control your wagering amount over a specific period of time. This will help you limit your payments as you will not be able to exceed the limit until it has been reset. Keep in mind that regardless if you wish to increase or revoke your limit the process will take 1 days.

DAILY	WEEKLY	MONTHLY
€ Amount	€ Amount	€ Amount
Confirm	Confirm	Confirm

Casino Heroes | Map | Play | Live Casino | Treasures | Promotions | €0.00 | 0 | [Avatar]

[Avatar]

This is a reminder

You have been playing for 60 min.

Your current session statistics:
During this session you have collected winnings of € 0

☐ I have read the message

Continue playing

Leave game

History

ACE OF SPADES

1	2	3
800	1600	2700
80	160	240
40	80	120
20	40	60
10	20	30
5	10	15
2	4	6

Doubles winning combination
Matches any other symbol on
payline

Pays 4x winning combination
except when 3 symbols are
showing

COINS: 3 | WIN: [Redacted]

BALANCE: 0 | COIN VALUE: €0.50 | COINS: 3

Balance: €0.00 | Bet: €1.50 | Win: [Redacted]

6.3. Player Information & Help Resources

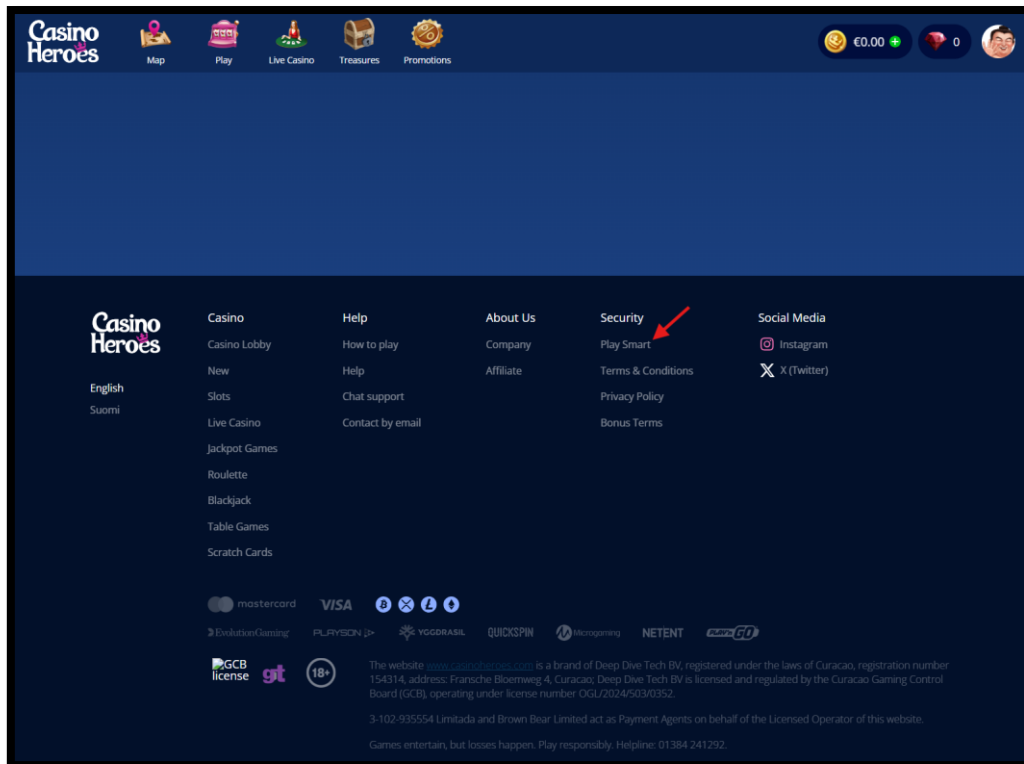
In addition to the in-account player protection tools, Deep Dive Tech B.V. provides dedicated Responsible Gaming information accessible directly from the website's footer. This page contains guidance on maintaining healthy gaming habits, identifying

potential signs of gambling-related harm, and contact details for professional support organizations.

The Responsible Gaming help page can be accessed at:

<https://www.casinoheroes.com/en/responsible-gaming>

<https://www.casinoheroes.com/fi/responsible-gaming>



Furthermore, Responsible Gaming information is reiterated in the Terms and Conditions under the “Responsible Gaming” section, where players are reminded of the available limits, self-exclusion tools, and contact options for obtaining assistance.

7. Responsible Gaming

7.1 Limits: You may at your discretion choose to limit the amount you are allowed to deposit (withdrawals increases the allowed deposit amount) during a day (00:00-23:59 CET), week (Monday-Sunday) or monthly (first - end of calendar month, or from the time of activation until end of month when limit is set). If you reach this limit for how much you deposit (with consideration also to withdrawals during the period), you will not be able to deposit more money. All limits are administrated and initiated by contacting the Casino support, through 'My Account' or email/chat. When a limit is set for the first time, it will immediately come to affect once it has been registered. If you wish to decrease a limit set, such change will take place immediately once registered. If you wish to remove or increase a limit set, such change shall become effective immediately. Please note that limits apply per Casino and not per license holder / company.

7.2 Self-exclusion: You may, at your discretion, choose to limit your ability to access your account for an indefinite period (indefinite self-exclusion) or a specified period (definite self-exclusion). Self-exclusions shall become effective immediately upon notification to our Support Team or upon submission directly through the Casino interface, when applicable.

7.2.1 A self-exclusion request is valid only for the specific Casino you are currently playing on and does not extend to any other brands operated by the same company.

7.2.2 If you wish to increase the duration of an active definite self-exclusion, such increase will take effect immediately. If you wish to decrease the duration of a definite self-exclusion or end it earlier, your request will be reviewed on a case-by-case basis and only after you have completed and submitted a Responsible Gambling questionnaire requested by our Customer Support. We reserve the right to deny such requests at our sole discretion.

7.2.3 We may, at our discretion and for any reason (including but not limited to concerns about problem gambling or security issues), refuse to re-open an account after any type of self-exclusion.

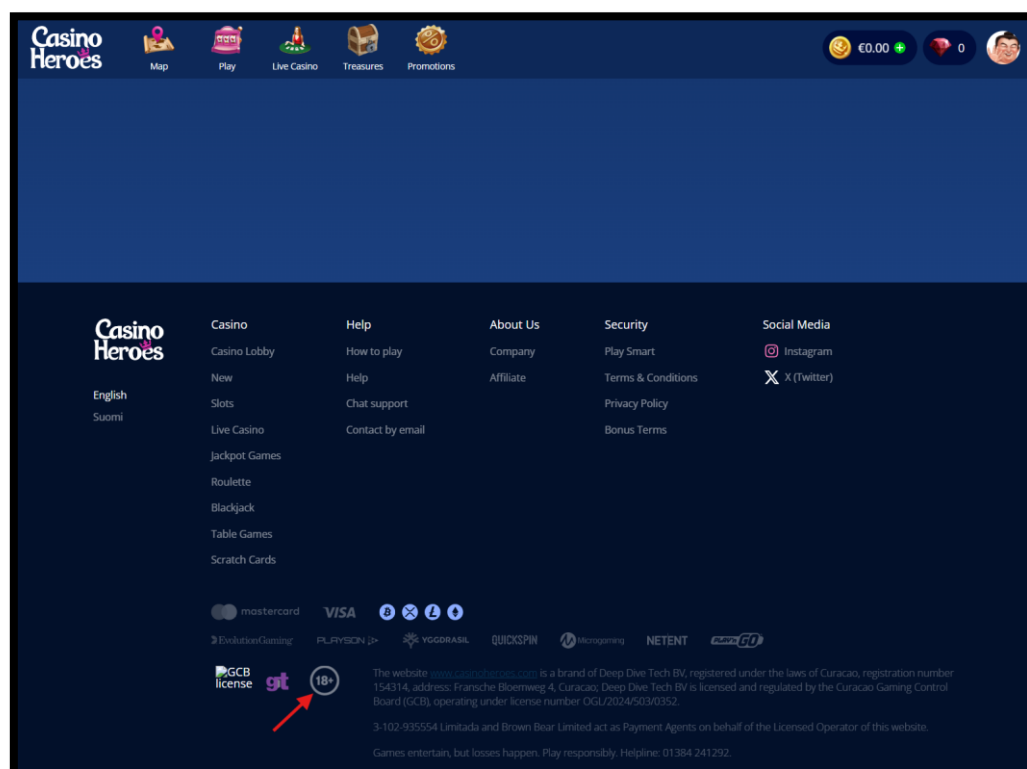
6.4. Prevention of Underage Gambling

Deep Dive Tech B.V. enforces a strict 18+ policy, ensuring that no individual under the legal gambling age can register or participate in gaming activities. Age and identity verification are performed automatically during the registration and account activation process through the secure BankID verification system, which authenticates player details directly with their financial institution.

This real-time verification confirms the player's full name, date of birth, and account ownership before access to gaming services is granted. As a result, only verified individuals aged 18 or older can create an account or make deposits. Any attempt by a minor to access the platform is automatically rejected.

The company clearly communicates its underage gambling policy to players in multiple locations to ensure full transparency and awareness.

- The 18+ logo is displayed visibly across all pages of the website and within marketing materials, reinforcing this restriction.
- The Terms and Conditions also include a dedicated section on underage gambling, where players are reminded that account creation and participation by minors are strictly prohibited and will result in account closure.
- The Responsible Gaming Help Page, available via the website footer, reiterates that access to the platform is strictly limited to individuals aged 18 years or older and provides educational information about the risks of underage gambling.



Underage Gambling

It is illegal for anyone under the age of 18 to open an account or to gamble on the Company, and we treat this responsibility very seriously. We carry out age verification checks on all customers where payment methods are available to persons under 18 years of age, and also make random age verification checks on customers.

Please note that anyone under the age of 18 using the site will have any winnings forfeited and risk being reported to the authorities.

Gambling Counselling Organizations

GambleAware offers assistance and helps to stop people getting into problems with their gambling habits. For more information, visit <https://www.begambleaware.org/>.

Gamblers Anonymous is a fellowship of men and women who have joined together due to their own gambling problem-related issues and help other compulsive gamblers to do the same. There are regional groups around the world. The Gamblers Anonymous international service site can be found at, www.GamblersAnonymous.org/ga/

Gambling Therapy provides support and counselling for anyone adversely affected by gambling. Members of the Gambling Therapy Team operates from locations both within the UK and internationally. The site can be accessed at, www.GamblingTherapy.org. Helpline: 01384 241292

Should any instance of underage gambling be identified, the account is immediately closed, all transactions are voided, and any deposited funds are refunded.

6.5. Detection and intervention

Player behaviour is monitored for warning signs such as extended play sessions, repeated deposit attempts, or frequent reversal requests. When indicators appear, the Team reviews the case and may contact the player to offer assistance, recommend setting limits, or initiate self-exclusion.

Players demonstrating potential problem gambling are provided with responsible gaming resources and, when appropriate, referrals to professional support organizations.

6.6. Staff Training and Awareness

All employees complete Responsible Gaming training covering:

- Identification of risky play patterns.
- Communication techniques for sensitive interactions.
- Internal escalation and documentation procedures.

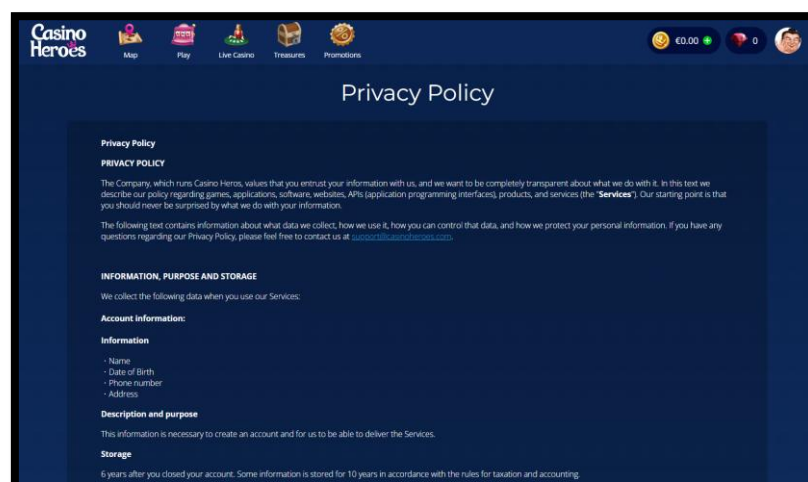
Training is refreshed annually and reinforced through periodic workshops.

7. INFORMATION SECURITY & DATA PROTECTION

7.1. Security Framework

The company's Information Security Policy establishes a comprehensive set of controls aligned with ISO 27001 principles. All sensitive data is protected using strong, industry-standard encryption methods both during transmission and while stored on company systems. Access to this information is strictly controlled through multi-factor authentication and role-based permissions to ensure that only authorized personnel can view or manage it.

The CTO oversees continuous monitoring, vulnerability testing, and disaster-recovery readiness. Regular penetration tests are conducted by external vendors to ensure ongoing protection of player and operational data.



7.2. Incident Management

All suspected security incidents are reported immediately to the CTO. Incidents are logged, investigated, and corrective measures implemented. Serious events are reported to the GCB without delay.

8. SUPPORTING POLICIES SUMMARY

To maintain regulatory alignment, Deep Dive Tech B.V. enforces the following internal policies (available to the GCB upon request):

- AML/CFT Policy
- Social Responsibility & Responsible Gaming Policy
- Information Security Policy
- Privacy & Data Protection Policy
- Marketing & Affiliate Compliance Policy

These documents collectively establish the foundation for ethical operations, transparency, and continuous compliance improvement.

9. DECLARATION

This Operational Manual accurately represents the structure, processes, and controls implemented by Deep Dive Tech B.V. in compliance with Curaçao legislation and the requirements of the Curaçao Gaming Control Board.

The company remains fully committed to safeguarding player welfare, ensuring fair play, and maintaining a culture of compliance throughout its operations.

Signature:  _____

Name: Andreas Dahl

Role: Chief Operations Officer

Date: 01/10/2025