

SEVENTIP N.V

Operational Manual



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Introduction

This Operational Manual has been prepared for Seventip N.V, a licensed online gaming operator offering Online Casino, Online Poker, and Online Sportsbook. It is designed in compliance with the new Curaçao legislation and covers critical aspects of operations, compliance, security, and responsible gambling.

Game Details

Seventip N.V provides a comprehensive suite of gaming products. Game content is supplied through leading providers. Each game category adheres to industry-standard payout structures, RNG certifications, and betting limits.

Poker

Seventip N.V has worked with software supplier A5 Labs to design and develop its front-end gaming platform to ensure that the product is user-friendly, modern, and reliable. The gaming application supports all major platforms (iOS, Android, MacOS, and Windows). The back-end was designed with a focus on game fairness and security. Protection of our player pool is paramount. In order to protect our player pool Seventip N.V will not only utilise traditional bot and collusion detection tools but also player identification based on in-game statistics. Our unique algorithms enable us to identify and deter predatory in-game behaviour, giving our product an edge over the competition.

Players can safely enjoy the product which includes Casino (RNG and live dealer) and several poker variants, including No Limit Texas and Pot Limit Omaha, in both cash game and tournament varieties. The plan is to enhance the product offering by introducing Sportsbook in the future.

The proprietary back-end provides a single point of management for all gaming systems, payment processors, bonus systems, responsible gaming and third-party services such as regulatory compliance, identity verification and affiliate management.

The backend operations dashboard enables management to have oversight of the following:

1. Players accounts including KYC and player tracking;
2. Back-Office Reporting & Functionality;
3. Payments and Accounting;
4. Promotions, Bonusing and Marketing.

Provider:

- A5 Labs

Poker rule variants available

- **No Limit Hold'em** -The most popular and common form of poker available, both in-app and globally. Players are dealt two private cards and use them with five shared community cards to make the best five-card hand. The key aspect is that players may bet all of their chips, or any amount below, at any juncture during the hand.
- **Pot-Limit Omaha** - a poker variant wherein each player is dealt four hole cards and must use exactly two of these to make the best possible hand with three of five shared community cards. Bets and raises cannot exceed the current total pot size at any juncture.
- **Short Deck** - also referred to as Six Plus Hold'em, Short Deck is a variant of Texas Hold'em that is played from a 36-card deck rather than a 52-card deck; all cards from six and below are removed from the deck. The play format matches Texas Hold'em, in that players receive two hole cards and must use them in conjunction with five shared community cards to make the best possible five-card hand, and can bet any amount of chips at any juncture in a given hand. Due to the 36-card deck, the odds of certain hand rankings are altered, and a key rule difference with Hold'em is that a flush beats a full house.

Poker game structure common to all poker offerings at WPT Global

1. **Pre-flop:** Each player is dealt hidden hole cards*. Betting round ensues.
2. **Flop:** Three community cards are dealt face-up. Betting round ensues.
3. **Turn:** One further community card is dealt face-up. Betting round ensues.
4. **River:** One final community card is dealt face-up. The final betting round ensues.
5. **Win Condition:** Last player standing in the hand, or strongest ranked hand (known as showdown) if two or more players remain after the final betting round

**Four hole cards in Pot Limit Omaha, two hole cards in all other variants*

Hand Rankings common to all poker offerings at WPT Global

Hand Ranking	Hand Ranking	Odds of Being Dealt
Royal Flush	A♠ K♠ Q♠ J♠ 10♠	1 in 649,740
Straight Flush	9♦ 8♦ 7♦ 6♦ 5♦	1 in 72,193
Four of a Kind	J♣ J♦ J♠ J♥ 5♠	1 in 4,165
Full House	K♠ K♦ K♣ 10♠ 10♦	1 in 693
Flush*	A♥ 10♥ 7♥ 5♥ 3♥	1 in 508
Straight	Q♣ J♦ 10♠ 9♠ 8♣	1 in 253
Three of a Kind	8♦ 8♣ 8♠ K♠ 2♣	1 in 46
Two Pair	J♠ J♣ 7♦ 7♣ 4♠	1 in 20
One Pair	Q♣ Q♦ 9♠ 5♣ 2♥	1 in 1.37
High Card	A♦ 10♣ 7♠ 4♦ 3♠	Occurs frequently

** please note that the ranking order for Short Deck poker varies, in that a Flush is higher than a Full house*

Types of poker games offered

Cash games

Online Poker Cash Games are real-money poker games in which players participate at virtual tables using cash-equivalent chips. Unlike tournament formats, cash games allow players to join or leave at

any time, and each chip in play directly represents a monetary value. Players wager real money on each hand, with blinds, antes, and table stakes remaining constant throughout play.

In a cash-game environment, players may buy in for any amount within the table's designated minimum and maximum limits. Each pot is settled immediately at the conclusion of the hand, and winnings or losses are reflected in the player's account balance in real time.

Cash games operate continuously, with tables available across various poker variants (ie., Texas Hold'em, Omaha, Short Deck), stake levels, and seat capacities. The gaming platform facilitates all card dealing, betting rounds, chip accounting, and hand resolution through secure, regulated software systems that comply with applicable online gaming regulations and responsible gaming standards.

Cash Game Table Sizes

Three variants are available. The same rules apply to all three, with only the number of players dealt into each hand differing:

- 2-handed: or 'heads up'
- 6-handed
- 8-handed

Cash Game Additional Features/Modifiers

- **Bomb Pot:**
 - when participating in a cash game with the 'bomb pot' modifier, a 'bomb pot' event may randomly occur.
 - Each player at the table participates with an ante of eight big blinds added to the pot from each stack.
 - The initial pre-flop stage of the hand is dealt, and the hand will begin proper with betting action at the beginning of the next round; the flop.
- **Big Ante:**
 - Cash game tables with the 'Big Ante' modifier post a higher ante than usual from all players at the table at the beginning of each hand

Flash Cash game variant

Flash Poker, or ‘fast-fold’ poker, mirrors the rules from cash games but differs in that players are instantly moved to a new table for a new hand upon folding or completing their previous hand. The player pool is composed of all players in the Flash Poker game at a given stake level.

Flash Poker Table Sizes

- 4-handed
- 8-handed

Flash Poker Variants

Flash Poker is currently available for two poker variants, both of which mirror the rules for their cash game equivalents:

- Short Deck Poker
- No Limit Hold’em

Cash games offered & rake per stake level and variant

Rake and any additional fees vary by currency, game type and stake level. Where indicated the standard rake percentage is applied to pots according to the stake structure and any maximum cap defined by product

Representative fee highlights

- **USD Hold’em cash games:** standard rake **4.00%** across micro → high stakes unless otherwise noted.
- **USD Hold’em Big Antes:** **4.00%** across listed stakes.
- **CNY Hold’em cash games:** usually **4.00%**, rising to **5.00%** for certain high stakes.
- **CNY Short Deck:** **3.00%–4.00%** depending on stake band.
- **NLHE Flash Cash:** **4.00%–5.00%** depending on stakes (micro = 4%, certain low/mid stakes = 5%).

- **PLO cash games: 4.00%** across listed stakes.
- **Straddle** and **Ante** columns are published per stake level where applicable.
- For Big Ante tables, the parenthetical values in stake tables indicate the collective big-ante amount per hand.
- Tables must be correctly labeled in UI and lobby with stake, straddle and ante values.

USD Hold'em Cash Games			
Micro Stakes			
Stakes	Straddle*	Ante*	Rake
0.02/0.05	0.1	0.02	4.00%
0.05/0.1	0.2	0.05	4.00%
0.1/0.2	0.4	0.1	4.00%
Low Stakes			
Stakes	Straddle*	Ante*	Rake
0.2/0.5	1	0.2	4.00%
0.5/1	2	0.5	4.00%
1/2	4	1	4.00%
Mid Stakes			
Stakes	Straddle*	Ante*	Rake
2/4	8	2	4.00%
3/6	12	3	4.00%
5/10	20	5	4.00%
High Stakes			
Stakes	Straddle*	Ante*	Rake

10/20	40	10	4.00%
25/50	100	25	4.00%
50/100	200	50	4.00%
100/200	400	100	4.00%
200/400	800	200	4.00%
400/800	1600	400	4.00%
500/1000	2000	500	4.00%
1000/2000	4000	1000	4.00%
2000/4000	8000	2000	4.00%

USD Hold'em Big Antes Cash Games			
Micro Stakes			
Stakes			Rake
0.01/0.02 (0.04)			4.00%
0.02/0.05 (0.1)			4.00%
0.05/0.1 (0.25)			4.00%
0.1/0.2 (0.5)			4.00%
Low Stakes			
Stakes			Rake
0.2/0.5 (1)			4.00%
0.5/1 (2.5)			4.00%
1/2 (5)			4.00%
Mid Stakes			
Stakes			Rake

2/4 (10)	4.00%
3/6 (15)	4.00%
5/10 (25)	4.00%
High Stakes	
Stakes	Rake
10/20 (50)	4.00%
25/50 (125)	4.00%
50/100 (250)	4.00%
100/200 (500)	4.00%
200/400 (1000)	4.00%
400/800 (2000)	4.00%
500/1000 (2500)	4.00%
1000/2000 (5000)	4.00%
2000/4000 (10000)	4.00%

CNY Hold'em Cash Games	
Micro Stakes	
Stakes	Rake
0.02/0.05/0.1	4.00%
0.1/0.2/0.4	4.00%
0.2/0.5/1	4.00%
0.5/1/2	4.00%
Low Stakes	
Stakes	Rake
1/2/4	4.00%

2/4/8	4.00%
3/6/12	4.00%
Mid Stakes	
Stakes	Rake
5/10/20	4.00%
10/20/40	4.00%
25/50/100	4.00%
50/100/200	5.00%
High Stakes	
Stakes	Rake
100/200/400	5.00%
200/400/800	5.00%
250/500/1000	5.00%
300/600/1200	5.00%
400/800/1600	5.00%
500/1000/2000	5.00%
1000/2000/4000	5.00%
2000/4000/8000	5.00%

CNY Short Deck Cash Games (CNY&USD)	
Micro Stakes	
Stakes	Rake
0.02	4.00%
0.1	4.00%
0.2	4.00%

0.5	4.00%
Low Stakes	
Stakes	Rake
1	3.00%
2	3.00%
3	3.00%
Mid Stakes	
Stakes	Rake
5	3.00%
10	3.00%
25	3.00%
50	3.00%
100	3.00%
High Stakes	
Stakes	Rake
200	3.00%
500	3.00%

NLHE Flash Cash Games (CNY&USD)

Micro Stakes

Stakes	Rake
0.01/0.02/0.04	4.00%
0.02/0.05/0.1	4.00%
0.1/0.2/0.4	4.00%
0.2/0.5/1	4.00%

0.5/1/2	4.00%
Low Stakes	
Stakes	Rake
1/2/4	5.00%
2/4/8	5.00%
3/6/12	5.00%
Mid Stakes	
Stakes	Rake
5/10/20	5.00%
10/20/40	5.00%
25/50/100	5.00%
50/100/200	5.00%
High Stakes	
Stakes	Rake
100/200/400	5.00%

PLO Cash Games	
Micro Stakes	
Stakes	Rake
0.02/0.05	4.00%
0.1/0.2	4.00%
0.2/0.5	4.00%
0.5/1	4.00%
Low Stakes	
Stakes	Rake

	1/2	4.00%
	2/4	4.00%
Mid Stakes		
	Stakes	Rake
	5/10	4.00%
	10/20	4.00%
	25/50	4.00%
	50/100	4.00%
High Stakes		
	Stakes	Rake
	100/200	4.00%

Multi-Table Tournaments

Definition

A scheduled poker event for which players buy-in and play until last man standing with increasing blinds levels at regular intervals, in which the sum of the total buy-ins or guaranteed prize is divided proportionally among the approximately 10%-20% of final finishers. While the payment structure may differ, it is always displayed within the tournament info tab prior to registering for a given event.

Fees

Multi-table tournament fees operate at a baseline of 10% fees. Prior to registration, the buy-in is broken down as follows:

- Standard Tournament: Buy-in + Fee
- Bounty Tournament: Buy-in + Bounty + Fee

Tournament Formats

- **Standard Guaranteed Tournament** - full buy-in minus fee is added to the guaranteed prize pool
- **Hyper/Turbo variants** - Similar in format to a standard tournament except the rate at which the blinds increase is faster, with lower intervals between blind levels.
- **Bounty Tournament** - whereby X% of a player's buy-in, usually 50%, constitutes their 'bounty'. Eg. \$55 WPT Knockout Kings buyin = Fixed bounty: \$25, prize pool: \$25, where knocking out a player will instantly award the fixed bounty to the winner of the hand in which they were expelled from the event.
- **Satellites** - step tournaments that feed into higher-buyin tournaments, where the prize pool consists of a number of entries to the target event proportional to the sum of buy-ins.
- **Live event feeders** - satellites whereby the target event is a live event entry in partnership with WPT Global.
- **Re-entry** - players may re-enter the event after being knocked out until a certain blind level, or a certain number of times.
- **Freezeout (One Shot)** - players register a single entry and cannot re-enter the event once knocked out.

Breaks

All tournaments, regardless of starting time, pause for a six minute break every hour at 55 minutes past the hour .

Global Spins

Definition

Global Spins are a Sit & Go poker single-table tournament format. Once three players have registered, a game is created with a hyper blinds structure. At the beginning of each game, a random multiplier is attributed to the prize pool, up to 6,000x.

Starting Chip Stack per Multiplier

Multiplier	2x	3x	5x	10x	25x	100x+
Starting Stack	400	500	600	700	800	1000

Prize Pool Multiplier

Multiplier	1st	2nd	3rd	Probability in 1M
6,000x	5,000x	500x	500x	1
240x	200x	20x	20x	10
120x	100x	10x	10x	100
25x	20x	2.5x	2.5x	1000
10x	8x	1x	1x	10000
5x	5x			100000
3x	3x			396822

2x

2x

492067

Global Spins Progressive Jackpot

A 1% fee is levied on all registrations to Global Spins as a contribution towards the progressive jackpot.

In the event that the maximum multiplier is randomly applied, the entire progressive jackpot for the respective buy-in level is added to the prize pool for that Global Spin game.

The current progressive jackpot total is displayed in the game lobby for each stake prior to registration.

Global Spins Rake and Fees

All Global Spins games levy a 5% rake plus an additional 1% contribution towards the progressive jackpot at each stake level.

Blind Levels and Structure for all Global Spins games

Blind Level	Blinds	Hands per Level
Blind Level 1	10/20	4
Blind Level 2	15/30	4
Blind Level 3	20/40	4
Blind Level 4	30/60	4
Blind Level 5	40/80	4
Blind Level 6	50/100	4

Blind Level 7	75/150	4
Blind Level 8	100/200	4
Blind Level 9	150/300	4
Blind Level 10	200/400	Unlimited

Casino

Summary

WPT Global's casino offering consists of two in-house developed games and a range of casino and slots games provided by Bragg and Pragmatic Play as aggregator

Casino Partners

- A5 Labs
- Bragg
- GAMETECH
- ATG
- GTech

List of Casino games

Please note that all of the below games are served through Bragg or Pragmatic Play as aggregator:

Game Title	Supplier	Desktop	Mobile
Poker Flips	WPT Global		

Poker Master	WPT Global	✓	✓
Blackjack	Pragmatic Play	✓	✓
Casino Hold'em	Pragmatic Play	✓	✓
Mega Roulette	Pragmatic Play	✓	✓
Mega Baccarat	Pragmatic Play	✓	✓
Speed Baccarat B	Evolution	✓	✗
American Roulette	Evolution	✓	✗
Caribbean Stud Poker	Evolution	✓	✗
Live Fortune Roulette	Pragmatic Play	✓	✓
Power Blackjack	Evolution	✓	✗
XXXTreme Lightning Roulette	Evolution	✓	✗
Immersive Roulette	Evolution	✓	✗
Super Sic Bo	Evolution	✓	✗
Free Bet Blackjack	Evolution	✓	✗
2 Hand Casino Hold'em	Evolution	✓	✗
Dragon Tiger	Pragmatic Play	✓	✓
Live Snakes & Ladders	Pragmatic Play Live	✓	✓
Aviator	SPRIBE	✓	✓
High Flyer	Pragmatic Play Live	✓	✓
Spaceman	Pragmatic Play	✓	✓
Big Bass Crash	Pragmatic Play Live	✓	✓
Plinko	SPRIBE	✓	✓

Mines	SPRIBE	✓	✓
Dice	SPRIBE	✓	✓
Dega Baby	O2X	✓	✓
Samurai Ikusa	O2X	✓	✓
Crash Golfing Glory	O2X	✓	✓
Odds On Winner	Pragmatic Play	✓	✓
Stock Market	Evolution	✓	✗
Hi Lo	SPRIBE	✓	✓
Hotline	SPRIBE	✓	✓
Mini Roulette	SPRIBE	✓	✓
Goal	SPRIBE	✓	✓
Keno	SPRIBE	✓	✓
Sweet Bonanza	Pragmatic Play	✓	✓
5 Lions Megaways	Pragmatic Play	✓	✓
Sugar Rush	Pragmatic Play	✓	✓

RTP for all Casino Games

Each game has a published **RTP** (Return to Player) percentage that must be shown to players where regulations require and must match supplier/contractual values.

Game

RTP

Poker Flips	-
Poker Master	-
Blackjack	99.59%
Casino Hold'em	97.6%
Mega Roulette	97.5%
Mega Baccarat	98.79%
Speed Baccarat B	98.34%
American Roulette	94.74%
Caribbean Stud Poker	96.3%
Live Fortune Roulette	95.07% - 97.30%
Power Blackjack	98.8%
XXXTreme Lightning Roulette	97.1%
Immersive Roulette	97.3%
Super Sic Bo	92.13%
Free Bet Blackjack	95.9%
2 Hand Casino Hold'em	97.84%
Dragon Tiger	97%
Live Snakes & Ladders	-
Aviator	97%
High Flyer	97%
Spaceman	95%
Big Bass Crash	95.5%

Plinko	97%
Mines	97%
Dice	97%
Dega Baby	94%
Samurai Ikusa	92%
Crash Golfing Glory	96%
Odds On Winner	96.51%
Stock Market	99%
Hi Lo	97%
Hotline	97%
Mini Roulette	97.75%
Goal	97%
Keno	97%
Sweet Bonanza	96.5%
5 Lions Megaways	96.5%
Sugar Rush	96.5%

Providers:

- ARCADEM
- ATOMIC SLOT LAB

- BLUBERI
- CANDLE BETS
- EVOLUTION
- GAMOMAT
- Golden Hero Gaming
- GIVME
- Gametech
- INDIGO MAGIC
- KALAMBA
- KING SHOW GAMES
- NETENT
- ORYX
- PRAGMATIC
- RED TIGER
- SAKURAGATE
- SEGA SAMMY
- SPRIBE

Sportsbook

Details

WPT Global's sportsbook offering is conducted through an integrated third party partner. User participation in sportsbook mirrors the casino experience, in that a user's balance is transferred to a new sportsbook window upon selecting 'sportsbook' in the WPT Global app. Once the player exits the sportsbook window, their balance is returned to the main lobby.

Sports covered

- Football (soccer)
- Basketball
- Esports
- Baseball
- Volleyball
- Table Tennis
- American Football

- Ice Hockey

Sportsbook rules

The full sportsbook rules are available through <https://wptglobal.com/sportsbooks-rules>, and also available in the app at all times through a 'rules' link, available in both the accordion menu and in the bottom left corner of the main sportsbook tab.

Types of Betting Offered

- **Single bets** - outright bets or individual standard wagers
- **Parlay** - or 'accumulator', a single bet that links together two or more individual bets, where winning is dependent on all placed wagers within the parlay winning

Provider:

- Saba

AML & KYC

Seventip N.V follows a comprehensive Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) framework in compliance with Curaçao regulations.

Player Identity Verification, AML Controls, Transaction Monitoring & Controls

Seventip N.V shall maintain accurate and up-to-date identification records for all customers. As part of a risk-based approach, Seventip N.V may obtain new or additional identification documents under the following circumstances:

- **Change in Payment Method:** When a customer changes their payment method, operators should verify the authenticity of the new payment method and may request additional documentation to support the change.
- **Expiration of Identity Documents:** Operators must ensure that the identification documents on file are current and valid. When an identity document expires, operators should obtain a new, valid document from the customer.
- **High-Risk Transactions or Behaviors:** In cases where a customer engages in high-risk transactions or displays behaviors indicative of higher risk, operators should consider obtaining updated identification documents and conducting enhanced due diligence as appropriate.

Required Customer Information

The Company's KYC procedures will require prospective customers to create a full profile at the point of registration (Simplified Due Diligence). The mandatory information required at the registration stage includes:

- Full name
- Permanent residential address
- Date of birth

The below are collected upon requesting KYC:

- Place of birth
- Nationality
- Identity number

Customer Due Diligence “CDD”

By following a risk-based approach, the appropriate due diligence can be applied to such a customer. This means that the higher the ML/FT risk is, the greater the level of due diligence will be applied. The Company identifies and performs verification checks on all players, as set out by the Curacao regulations. Verification may be carried out before the customer reaches the Curacao regulations if suspicious activity is detected.

When a player engages in any financial transaction, whether single, series, combination, or pattern, that equals or exceeds \$2,000 USD (4,000 NAF), CDD measures must be carried out. For occasional transactions that exceed the monetary equivalent of \$2,000 USD, CDD measures are mandatory.

If there is any suspicion of money laundering or terrorist financing activities, CDD measures must be performed regardless of the transaction amount. If there are any doubts regarding the veracity or adequacy of previously obtained customer identification data, CDD measures must be reinitiated.

The \$2,000 USD threshold also includes peer-to-peer transfers, and CDD/KYC measures must be applied once this limit is reached. Once customer due diligence is requested the customer will have 30 days to provide these documents.

A risk-based approach is applied in regards to obtaining up to date ID documents, when a customer is requested to provide new documents, any pending withdrawals will be held until satisfactory documents are received.

Due Diligence documentation

In order to verify the details on their player account, the company will request the customer to provide a copy of one document from each of the categories listed below:

Personal Identification

- Valid Passport
- Valid driving License
- Valid National identification Document (Picture ID)
- Where any such document does not allow verification of one's residential address,
- the following documents will be requested.

Address verification

- Valid National Identification Document (Picture ID) including residential address

- Utility Bill, which is less than 3 months old. Mobile phone bills are not sufficient. The bill provided must pertain to a service delivered to the address provided
- Tax Bill, which is less than 3 months old
- Copy of Bank Statement, which is less than 3 months old

Source of Payment Verification

- When we are unable to verify the ownership of the payment method, the customer will be required to provide:
- Registered credit or debit card (Front only)
- Account Bank statement / Wallet statement of payment registered with the account.
- All documents received are vetted by team members and authenticity checks ensure the documentation is genuine and have not been tampered or are fake.

Transaction Monitoring and Reporting

Any transaction or series of transactions that meets or exceeds the \$2,000 USD threshold triggers the requirement for CDD/KYC measures. Upon reaching the \$2,000 USD threshold, the player will be restricted from depositing additional funds into their account or withdrawing funds from their account until the required CDD/KYC measures have been completed.

If the \$2,000 USD threshold is met, the business relationship with the player must be terminated within 30 days. The transaction(s) must be reported to the Financial Intelligence Unit (FIU) in accordance with the regulatory requirements.

Enhanced Due Diligence

Enhanced Due Diligence (EDD) must be conducted in situations where the risks of money laundering or terrorist financing are deemed to be higher. Specific scenarios where EDD is mandatory include, but are not limited to:

- Residents of Higher Risk Geographic Areas: Customers residing in or transacting from regions identified as having a higher risk of money laundering or terrorist financing must be subject to EDD. This includes countries with inadequate AML/CFT regulations or those identified by international bodies such as the Financial Action Task Force (FATF).
- Politically Exposed Persons (PEPs): Customers who are Politically Exposed Persons (PEPs), including their family members and close associates, require EDD. PEPs are individuals who hold or have held prominent public positions and are at a higher risk due to their potential exposure to corruption and bribery.

- **Products or Transactions that Might Favor Anonymity:** Transactions or products that provide a higher level of anonymity, such as certain types of online payment methods or virtual currencies, require EDD to mitigate the risks associated with anonymity.
- **New Products and New Business Practices:** The introduction of new products, business practices, delivery mechanisms, or the use of new or developing technologies (both for new and pre-existing products) necessitates EDD. Operators must assess the associated risks and implement appropriate measures to mitigate them.
- **Unusual Transactions or Activities:** Any transactions or activities that appear unusual or inconsistent with the customer's known behavior or profile must be subject to EDD. This includes large or complex transactions, patterns of transactions that are unusual, or any other activities that raise suspicion.

EDD Measures

In conducting EDD, operators should implement the following measures:

- **Obtain Additional Information:** Gather more detailed information on the customer, their source of funds, and the purpose of the transactions.
- **Increased Monitoring:** Increase the frequency and intensity of monitoring the customer's transactions and activities to identify any unusual or suspicious behavior.
- **Senior Management Approval:** Obtain approval from senior management before establishing or continuing business relationships with high-risk customers.
- **Enhanced Documentation:** Maintain comprehensive and detailed records of the EDD process, including the rationale for considering the customer or transaction as high risk and the measures taken to mitigate these risks.

Acceptable EDD Documentation

- The below documentation is accepted when requesting EDD documentation:
- Payslips;
- Bank statement showing salary being received;
- Tax Return;
- Company's financials;
- Savings.
- Other types of documents may be requested depending on the person's occupation and activity on the account.

Politically Exposed Persons “PEP” Screening

PEP screening must be conducted when a player's cumulative deposits reach or exceed \$2,000 USD (4,000 NAF) over their lifetime. This screening helps identify individuals who may hold or have held prominent public positions and are considered to present higher risks due to their potential exposure to corruption.

All customers who are re-screened are screened against the PEP database as part of on-going monitoring. Customer-facing team members are also provided with AML/CTF training during induction, as well as on an annual basis, in order to detect any suspicious activity.

Enhanced Due Diligence for PEPs

Players identified as PEPs require senior management approval to continue their business relationship with the casino. Enhanced measures must be taken to establish the source of the player's wealth and the source of their funds.

These measures are crucial to ensure that the funds are from legitimate sources and to mitigate risks associated with corruption and other illicit activities. Ongoing Monitoring for PEPs:

- Players identified as PEPs require senior management approval to continue their business relationship with the casino.
- Players identified as PEPs must be subject to increased scrutiny through ongoing monitoring.
- The frequency of ongoing monitoring should be tailored to the risk level associated with the PEP, ensuring any suspicious activity is promptly detected and addressed.

Screening Systems:

Our company will implement robust systems and processes to screen all players against the specified sanctions and PEP lists during the onboarding process and on an ongoing basis. Staff will be trained to understand the importance of sanctions and PEP screening, how to conduct these checks, and the necessary steps to take when a match is found.

Any positive matches to the sanctions or PEP lists will be documented and reported to the appropriate authorities as required by law. Detailed records of all screenings and actions taken will be maintained for regulatory compliance and audit purposes.

Transaction Monitoring Tool – Comply Radar AML Integration

ComplyRadar is an end-to-end, AI-driven financial crime compliance platform that provides real-time AML transaction monitoring, behavioural analysis, risk scoring, fraud detection, and case management. It ensures that regulated entities maintain effective oversight of customer activity, identify suspicious behaviour promptly, and comply with global AML/CFT regulatory obligations.

1. Core Purpose & Compliance Framework

ComplyRadar enables organisations to detect, analyse, and manage suspicious activities relating to money laundering and fraud.

Its modules operate within recognised international standards, including **FATF**, **EU AML Directives**, and **FinCEN** expectations, ensuring regulatory alignment and fully auditable processes.

The system provides a **risk-based approach**, continuous monitoring, automated reporting, and transparent investigation workflows, all designed to minimise false positives and strengthen operational efficiency.

2. AML Transaction Monitoring Module

Continuously monitors customer transactions, detecting anomalies such as unusual transaction sizes, frequency anomalies, transfers involving high-risk jurisdictions, and deviation from expected behavioural patterns.

Advanced Behavioural Analysis

- Uses **AI and machine learning** to identify subtle patterns such as layering, structuring, or cumulative behavioural risk not visible through rules alone.

Customer Risk Profiling

- Generates holistic customer risk profiles combining historical transactions, geographical indicators, and other AML risk factors to prioritise high-risk cases.

Regulatory Alignment & Auditability

- I. Provides **regulator-ready reports**, complete audit trails, and workflow logs documenting every investigation step and decision.

Rules Engine & Back-Testing

- A configurable rules engine allows institutions to tailor scenarios to their risk appetite.
- A sandbox environment supports risk-free back-testing of new rules.

3. Risk Scoring Module

Purpose

Provides an automated, flexible, and transparent risk-based approach aligned with FATF recommendations for assessing customer and transactional risk.

How It Works

- Calculates risk scores using predefined rules, demographic data, transaction patterns, jurisdictions, behavioural indicators, and client-specific business risk metrics.
- Supports **multiple models** (AML / Fraud / Responsible Gaming).
- Tracks **historical risk trends** to identify changes in customer risk over time.
- Allows full drill-down into rules contributing to each score.

4. Fraud Detection Module

Real-Time Fraud Identification

- Monitors activity for anomalies such as rapid deposits, unusual spending, irregular device usage, or suspicious access attempts.

Machine Learning & Behavioural Analytics

- o Identifies complex or emerging fraud patterns by analysing deviations from customer baseline behaviour.

Covers multiple fraud typologies:

- o **Account Takeover Prevention**
- o **Payment Fraud Protection**
- o **Promotion & Affiliate Fraud Monitoring**

5. Case Management Module

Centralised Investigation Platform

Provides a unified hub for AML, fraud, and responsible gambling investigations, consolidating all related data, alerts, and documentation.

Workflow Automation

- Automatically assigns alerts based on workload.
- Standardises investigation procedures with structured workflows.
- Automates repetitive processes such as case intake, report preparation, EDD requests, STR/SAR preparation, and reminders.

Integration & Scalability

- Connects seamlessly with banking systems, payment gateways, CRM platforms, and proprietary systems.

User-Friendly Dashboards

- Intuitive interface requiring no technical expertise.
- Role-based access and clear navigation for investigators.

Record Keeping

Seventip N.V shall maintain records, containing the information and documentation necessary to decide whether the objective of the CDD measures referred for at least five (5) years after the business relationship is ended, or after the date of the occasional transaction.

Responsible Gaming

In order for the relevant departments and teams to ensure Responsible Gaming the company is currently preparing to automate the tools for customers to request limits, timeouts and self-exclusions. Due to product limitations, the business faced considerable efforts in developing tools that allow customers to regulate their gambling by requesting limits, checks as well as timeouts and self-exclusions. By the end of Q1 2026, the business should have these tools successfully implemented¹.

Self-Exclusion Mechanisms, Limits & Controls

Here is an overview of the various tools that are available to the players:

- o Self-exclusion, permanent or for a specific period of time (6 months, 1 year, 2.5 years and 5 years)
- o Cool off for a specific period of time - (24hrs, 72hrs, 1 week, 1 month, 3 months)

Customers who asked to set a permanent or temporary self-exclusion will not have their accounts automatically re-opened on the expiry of the exclusion period. Such customers can only have their accounts re-opened after contacting us themselves and after the RG team reviews the customer case. Moreover, all marketing communication is switched off for all self-excluded player accounts.

Reports

Our reporting system focuses on various indicators of harm such as High-Risk Deposit Amounts, Increase in Deposits, Increase of Stakes and/or Losses, Overnight and/or Long-Lasting Game play sessions.

- o Reports on deposits within 24 hours
- o Reports on failed deposits due to insufficient funds
- o Reports on percentage of days active within a month
- o Reports on player gaming activity (stakes)
- o Reports on losses
- o Reports on the number of different payments methods used by the player

¹ Kindly refer to appendix 1

Triggers and flags

- o Total deposits are 15 times greater than the ones of the previous month
- o Deposited amount equals or exceeds 10k within 24 hours
- o Number of cancelled withdrawals exceeds the number of 4 in 24 hours
- o Number of failed deposits due to insufficient funds exceeds 5 within 24 hours
- o Percentage of losses is 100% higher than the previous quarter
- o Spikes in customer contacts
- o Number of used payment methods is equal or greater than 3 within a calendar year

Customers that hit any of the above triggers, will be flagged to the Responsible Gambling Team for further review.

Tools for Vulnerable Individuals

Customers must confirm that they are of legal age upon registration stage and accept the following statement: 'I accept WPTGlobal's Terms and Conditions. I have read and understood WPTGlobal's Privacy Policy & Cookie Policy as published on the site and confirm I am 18 years of age or over'.

Protecting Minors

WPTGlobal, will be providing following information in the footer section:

- the company's details within the footers;
- a sign which indicates that underage gaming is not permissible. Clicking on the logo the customer is directed to a page where information with the below content can be found:

'Over 18s only

It is an offense for anyone under the age of 18 to open an account or to gamble with WPTGlobal. We carry out age-verification checks on all customers who use payment mechanisms which are available to under 18s and additionally perform random age-verification checks on customers using other forms of funding mechanisms. We may ask for information to verify your age and could restrict or suspend your account until your age is confirmed.

PLEASE NOTE THAT ANYONE UNDER THE AGE OF 18 YEARS OLD FOUND TO BE USING THIS SITE WILL HAVE ANY WINNINGS FORFEITED AND MAY ALSO BE REPORTED TO THE POLICE'.

Players with minors in the house that use the Internet are advised to set up parental controls in their operating system or install specialist software. There are a number of third-party applications available that parents or guardians can use to monitor or restrict the use of their computer's access to the Internet. These include:

- o Net Nanny filtering software protects children from inappropriate web content:
www.netnanny.com
- o CYBERSitter filtering software allowing parents to add their own sites to block:
www.cybersitter.com

Furthermore, there are responsible gambling messages displayed on the website such as “Gambling can be addictive. Please play responsibly” that are linked with our dedicated RG page that informs the customer about the possible risks and the strategies that could be employed to make gambling an enjoyable experience. Other useful info/tools to practise RG, for example info on how to gamble responsibly, a self-assessment, information for concerned third parties with the behaviour of their loved ones, indicators of when gambling can be considered an issue and what to do in those circumstances, information on support organisations and tools to blocking gambling sites.

How to Protect the vulnerable customers

One of our biggest priorities is to provide our Services for fun and entertainment. In cases where our Responsible Gambling team notices that this is no longer the case for a customer, action is being taken to protect the vulnerable person and its family and close environment.

The customer is contacted from our side via our established communication channels and is asked how he or she feels: if gambling has affected his/her life in any way; if personal commitments are neglected and deadlines missed; if the customer is having financial difficulties or struggling with payments and expenses in general, etc. (RG to be checked template to be linked here)

Once the customer has shared more information on the above, the Responsible Gambling Team will review the account and take all necessary actions, which can vary from proposing or imposing the setting of limits, providing a cool off so that customers can distance themselves from gambling, permanent closure of the account in case the customer indeed faces a problem and of course assisting and proposing professional help through official phone lines and websites.

Affordability Checks

At WPTGlobal, our aim is to ensure that all our customers are comfortable with their spendings and in line with their income. Therefore, our Responsible Gambling Team is performing regular

affordability checks on the flagged player accounts. The customers might be asked to send over documentation on their monthly and/or yearly income such as Payslips or Bank statements or any other official document showing their financial status.

In the event where a customer refuses to hand in the required documentation the company reserves the right to suspend the player account temporarily or permanently.

Complaints and Communication

As part of the operational process, we will keep for at least 2 calendar years from the date of the last interaction a record of:

- all player interactions/complaints;
- date of each interaction; and
- whether an interaction has been ruled out and the reasons for this.

Our RG team will respond to player complaints within 3 days from when these were logged. The players can find all communication details on our website and reach us via email.

Staff Training & Intervention Protocols

Training and Identification of Potential Gambling Problem

WPTGlobal is taking Responsible Gaming very seriously and therefore has invested in external and internal Training of its employees by experts who are very well trained and have a vast knowledge in Responsible Gambling or Gambling Addiction.

- External Training is conducted by ARQ Group yearly, and our staff obtains a certificate of attendance.
- As for internal trainings these happen when an employee is onboarded as well as during frequently during refresher sessions to ensure everyone is up to date with the the requirements

Our aim is to ensure that our Customer Support and Responsible Gambling team can identify any potential harm, monitor and interact with customers that might show some signs of problematic gambling behaviour demonstrating signs of agitation, distress, intimidation, aggression, and/or any other behaviour.

Following (but not limited to) statements can act as indicators that the customer might be at risk:

- o I have lost too much money;
- o I have financial difficulties, debts;
- o It is very difficult to keep up with the expenses now;
- o What I am doing is not healthy anymore;
- o I am suffering/ I have problems;
- o My family is being affected;
- o Please refund me anything, I really need this money;
- o Please process my withdrawal now I need the money urgently;
- o Customer is begging for a bonus constantly;
- o Customer contacts via chat/email are increasing rapidly;
- o Constant change in limits set.

Our CS agents are trained to pick up on these cues and when they suspect that a customer is experiencing difficulty as a result of their gambling, they will point them to the support organizations that could assist them. They would also notify the Responsible Gambling Team about their concerns, who would then need to perform a thorough check on the player account and advise on the next steps. Those can vary from temporary or permanent account closure, refund of any remaining balance, block of financial and game play activity, block of all payment methods used by the customer and others.

Support Organisations and Helplines



The Responsible Gaming Foundation was founded in 2014 in Malta, and a national helpline was set up to provide support and guidance to individuals, family members, or significant others who are experiencing any problems related to gambling. www.rgf.org.mt



BeGamble Aware: aims to provide the facts about gambling in an accessible manner and supports initiatives that help prevent gambling from becoming a problem and minimise gambling-related harm. It is administered by The GREaT Foundation, a charity which raises funds from the gambling

industry to support research, education and treatment of Problem Gambling.
www.begambleaware.org / Freephone 24-7 National Gambling Helpline :0808 8020 133.



Gambling Therapy: In addition to these English language services, help is available in several other languages at Gambling Therapy. www.gamblingtherapy.org.

Data & Cybersecurity Measures

Seventip N.V. relies on AWS cloud infrastructure for secure data storage, eliminating the need for physical servers. Data is encrypted at rest (AES-256) and in transit (TLS/HTTPS).

Key security measures include:

- Role-based access control (RBAC) and two-factor authentication.
- Regular penetration testing and vulnerability assessments.
- Secure development lifecycle (SDLC) for all gaming applications.
- Incident response procedures including monitoring, containment, eradication, and recovery.
- Daily backups stored in secure offsite locations with regular restore testing.
- VPN access with 2FA for all remote staff connections.

Compliance with GDPR and Curaçao data protection standards is maintained, supported by regular internal and external audits.

Amazon Web Services

Seventip N.V. engages with Amazon Web Services (“AWS”) for hosting services. AWS began offering IT infrastructure services to businesses in the form of web services - now commonly known as cloud computing. One of the key benefits of cloud computing is the opportunity to replace up-front capital infrastructure expenses with low variable costs that scale with your business. With the Cloud, businesses no longer need to plan for and procure servers and other IT infrastructure weeks or months in advance. Instead, they can instantly spin up hundreds or thousands of servers in minutes and deliver results faster.

Today, AWS provides a highly reliable, scalable, low-cost infrastructure platform in the cloud that powers hundreds of thousands of businesses in 190 countries around the world. With data centre locations in the U.S., Europe, Brazil, Singapore, Japan, and Australia. Seventip N.V. has considered the following benefits of utilising AWS for its services:

- Exemplary AWS documentation
- Transparent billing system with no “hidden costs”
- Effortless scalability and flexibility

- Integrations with 3rd party services and delivery automation
- Integrated audit service and high security measures: <https://aws.amazon.com/security/>
- Closer to Asia and therefore do not expect latency issues
- Future plans also include EU expansion and some regulated markets require servers to be in EU
- The business would like to reduce investment in hardware for launch, to be in a position to invest into product development and its expansion instead during the first years.

Data Storage Strategies

WPTGlobal employs a multi-tier data storage strategy on Amazon Web Services (AWS), optimized for performance, durability, security, and operational efficiency. The data infrastructure leverages dedicated AWS data services aligned with workload characteristics and access patterns.

1. Object & Analytical Storage — Amazon S3

Unstructured and semi-structured data is stored in **Amazon Simple Storage Service (S3)**. This includes raw application data, media assets, and post-processed analytical outputs. Processed datasets are stored as **Parquet files**, enabling highly efficient compression and columnar querying for downstream analytics.

S3 serves as the basis for scalable and cost-efficient data retention, with lifecycle policies and data tiering capabilities enabling future optimization for archival and analytical workloads.

2. Transactional Storage — Amazon RDS

Player profile, in-game transactional data, and relational entities are stored in **Amazon Relational Database Service (RDS)**. RDS provides managed SQL functionality, delivering automatic patching, monitoring, and high-availability capabilities.

To accommodate read-heavy workloads and ensure minimal latency for queries, the primary database instance is augmented with a **Read Replica**. This architecture distributes load, ensures high performance, and enables asynchronous replication for operational resilience.

3. High-Speed Cache & Session Store — Redis

Session-level state and ephemeral data are stored in **Redis**, used as a high-speed in-memory cache to reduce database query overhead and maintain low-latency session management for gameplay and user onboarding flows. Redis ensures rapid lookups, reduces database pressure, and improves overall application responsiveness.

4. Security & Network Controls

All data services operate within a **private network**, leveraging VPC-level isolation and controlled ingress/egress paths. Sensitive data at rest is encrypted using AWS-managed encryption keys, and encryption in transit is enforced via TLS across service boundaries to meet industry compliance expectations.

5. Backup & Recovery Strategy

Regular backups are implemented across all critical storage tiers:

- **Hourly incremental backups** support near-term operational recovery.
- **Nightly full backups** support disaster recovery scenarios.
- **Retention Policy:** 30 days for all critical datasets.
- **RDS PITR** allows recovery to any second within the retention window.
- **Encryption at Rest:** enforced using AWS managed encryption (KMS).
- **Encryption in Transit:** TLS enforced for intra-service communication.
- **S3 durability mechanisms** ensure resilience against hardware failures.

6. Data Durability & Availability

The combination of RDS replication, Redis caching, and S3 redundancy ensures a balance of durability and performance. S3 guarantees **11 nines durability (99.999999999%)**, while RDS replicas enhance availability with minimal impact on transactional throughput.

Outcome & Benefits

This architecture provides:

- Optimized data performance for heterogeneous workloads.
- Reduced operational overhead via managed AWS services.
- High durability and resilience against failures.
- Enhanced data security through encryption and private networking.
- Future scalability for data analytics and query processing.

AWS & Google Workspace Configuration

1. Access Control & Authentication Policies

1.1 Identity Federation & SSO

Organizational access to AWS and cloud applications is federated through **Okta SSO**, providing centralized identity governance. Session tokens have a **maximum validity of 60 minutes**, minimizing exposure from stale sessions. MFA enforcement uses **Google MFA**, ensuring strong authentication.

1.2 IAM Roles & Service Access

IAM access follows least-privilege principles:

- User-level permissions are not granted directly; roles are assumed.
- **IAM Keys** are restricted to automated workflows and third-party workloads with defined scope and minimal permissions.
- **AWS Root Account** is secured with MFA and remains unused except for governance functions.

1.3 Tagging-Oriented Access Enforcement

AWS **Service Control Policies (SCPs)** enforce mandatory tagging for all resource creation events. This ensures accountability across business units, cost allocation, security scope, and lifecycle management.

Tag keys typically cover:

- Department
- Environment (e.g., Dev, Staging, Prod)
- Project
- map-migrated

Resource creation without valid tagging is programmatically denied.

2. MFA & Credential Security Enforcement

- **Okta + Google MFA** enforced for cloud access.
- AWS **Root user** MFA locked and access controlled.
- Google Workspace admin access restricted to IT administrators with MFA.
- Password rotation and device trust policies enforced via corporate identity provider.

No privileged access is permitted without MFA; remote administrative access routes are consolidated under SSO flows.

3. Secrets & Credential Storage

Secrets are centrally managed through:

- **AWS Secrets Manager** for infrastructure and runtime-level secrets.
- **Keeper** for human-level credential vaulting and shared-password control.

Access to secrets follows **role-based access control (RBAC)** with principle of least privilege. Secrets are versioned and rotated where required by policy.

4. Infrastructure Deployment & Change Management

Infrastructure provisioning, configuration, and updates are executed through Infrastructure-as-Code (IaC) using **Terraform**. Benefits include:

- Reproducibility & idempotent deployments
- Version control & auditability (via Git)
- Reduced manual configuration risk
- Automated compliance guardrails

CI/CD workflows ensure infrastructure changes undergo validation and pull request approvals prior to promotion.

5. Operational Governance & Least Privilege Model

Operational governance objectives include:

- Minimizing data exposure surfaces
- Isolating workloads via VPC and subnet segmentation
- Applying least privilege to identities, services, and third-party integrations
- Reducing credential footprints through SSO and ephemeral tokens

Audit logs are retained for operational and compliance review, and cloud access is periodically reviewed by IT security stakeholders.

Cybersecurity Protocols

Cloudflare solutions protect the main WPTG applications, APIs, and websites. Some of the solutions we offer include a Web Application Firewall (WAF) to protect APIs and websites against well-known attacks such as SQL injection, XSS, generic malicious payloads, known vulnerabilities, and some 0-days.

The Cloudflare security solution also protects the WPTG infrastructure against DDoS and bot attacks. It combines machine-learning algorithms with the Turnstile CAPTCHA to mitigate such attacks. Some parts of our infrastructure are also prepared to scale horizontally during traffic spikes for a period of time to avoid impacting users' experience. On the application-layer side, we also implement rate limiting and one-time passwords for critical functionality, such as the login, signup, and money transfer pages, to mitigate more sophisticated automated attacks.

Governance & Compliance Framework

Seventip N.V.'s Directors and MLRO oversee implementation of compliance, security, and responsible gaming obligations. Annual internal reviews, and training, ensure ongoing alignment with Curaçao's National Ordinances and Gaming Control Board requirements.

Appendix 1

Some of the below limits can be changed by the customer. When a customer selects to set a stricter limit, this must be immediately applied. When a customer wants to reduce/remove an already set limit, the request can only be implemented after 24hrs from when the request was received.

Customers that set a permanent or temporary self-exclusion will not have their accounts automatically re-opened on the expiry of the exclusion period. Such customers can only have their accounts re-opened after contacting the business themselves and after the RG team reviews the customer case. When a customer revokes an indefinite period of self-exclusion, this can only be effective after the lapse of not less than 7 days from the day we receive the notice. Moreover, all marketing communication is switched off for all self excluded player accounts.

For customers who opted to set a cool off period, the account is reopened automatically after the set time frame has elapsed.

Deposit Limit

The deposit limit mechanism allows customers to limit their deposit:

- Daily;
- Weekly;
- Monthly.

Loss Limit

A loss limit mechanism allows customers to set a limit on the amount they can afford to lose over a period of their choice. The loss limit can be set at:

- 24 hours;
- 7 days;
- 30 days.

Once the customer sets a loss limit, it can only be increased after the elapse of 24 hours.

Time-Out

The time-out mechanism allows customers to take a break from our products for a time of their choice:

- o 24 Hours;
- o 7 Days;

- o 30 Days.

Self-Exclusion

The Self-Exclusion Mechanism is a mechanism that allows customers to block themselves from their accounts for a period of:

- 6 Months;
- 1 Year;
- 3 Years;
- 5 Years;
- Permanent.

Once a customer has self-excluded and cannot access their account, Seventip N.V has a procedure in place to ensure customers do not receive any marketing or promotion communications.