

SEVENTIP N.V

Business Plan

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1. EXECUTIVE SUMMARY

MISSION STATEMENT

Trading as 'WPT Global', Seventip N.V is set on becoming the prime destination for online poker, offering players a fair game through its state of the art AI driven platform. A venue where tradition meets the future of poker, placing the player at the heart of the business with a holistic view on experience, interaction and immersive gameplay.

Seventip N.V is making this application for a Curacao Licence to allow B2C activity as well as opportunities to enter into agreements with other operators in numerous jurisdictions under the auspices of a gambling regulator.

The company is pursuing the opportunity for a Curacao licence as part of its ongoing growth strategy and sees Curacao as the ideal jurisdiction to base itself and develop its business.

Within five years, Seventip N.V endeavours to be one of the best online poker gambling providers within the industry. The Company has been built around a team of highly experienced poker and gambling executives who will utilise personal industry experience, connections and knowledge to compete against, disrupt, and displace already established actors within the iGaming space.

Seventip N.V is already licensed by Gaming Services Provider N.V under the Licence 365/JAZ issued for the provision of casino games. The Company has secured a brand licensing agreement with the World Poker Tour (WPT) and the product is released and marketed under the brand 'WPT Global' at the web address *WPTGlobal.com*. The iconic WPT brand has been at the forefront of poker innovation since 2002. By leveraging one of the best-known brands in the industry, Seventip N.V will exploit the credibility and brand recognition instantly afforded to its product by WPT and aggressively acquire customers.

Consumer Product

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.

Customer acquisition leverages our brand and partnership with the WPT and retention of the customers will increase as the Company cultivates a large player pool by providing a fun, safe and sustainable poker experience.

Seventip N.V is a safe and fair online poker platform that aims to bring the sophistication and quality of a world-class online poker platform to poker enthusiasts. The Seventip N.V team contains both experienced executives and knowledgeable poker players in order to deliver the best experience for players. It offers new and exciting poker games with a safe and lively game playing environment. Our platform offers an entire range of services including payment processing, transaction management and customer support to the highest of standards.

Seventip N.V uses the services of Bragg Gaming Group and Gametech to provide a competitive casino offering including casino slots, & casino table games. Additionally, Seventip N.V also utilises casino games such as 'Poker Flips' and 'Poker Master' provided by our main supplier A5 Labs.

All player information is kept confidential with particular focus on security and privacy of players' personal and financial data. Seventip N.V also adheres to a strict privacy policy in our

operations. There is a zero tolerance for fraud and collusion. Our systems perform random security checks to maintain system integrity and fairness at the tables. If a player is found colluding, chip dumping or any other deceptive practice, the business will close their account immediately.

Poker games can be thrilling, fun, and rewarding but like all good things, practice in moderation is key. In order to mitigate the negative effects of excessive or irresponsible gambling, Seventip N.V constantly monitors user data and patterns of game play.

Support Technology

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:

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

2. BUSINESS STRATEGY



The business has been operating for 2 years since April 2022. During this time the strategy was to get to market as quickly as possible, build the team and improve basic product features.

Going Forward - 3 year plan

Now that we have established our product, business and basic model we are focused on achieving the aim of being 'the best poker platform' in the countries that we operate in within 3 years.

To achieve our vision we have split the business into 4 key areas:

1. People - To be the best we need to have the best and brightest people in the business.
2. Product - We are constantly updating and improving the product
3. USPs - We have identified key areas where we can match or beat our competitors.

These areas will take time to bed in and become part of our brand.

- a. Value
- b. Trust & Security
- c. Customer Experience

4. Performance - Once the first 3 pillars are in motion it should in theory become easier for marketing and business teams to acquire and retain customers.

To be fully focused we will assign country managers and prepare business plans for every country. Each plan will contain actions, strategies and goals (long term and short term) across all areas of the business (UA, VIP, Affiliation, SEO, Poker, Casino, Events).

3 Year Forecast:

	2023 Total	2024 Total	2025 Total	2026 Total
Net Gaming Revenue (NGR)	\$ 35,128,862	\$ 104,889,768	\$ 160,138,737	\$ 240,852,192
Marketing (not inc Affiliate)	\$ (13,166,584)	\$ (25,016,510)	\$ (47,531,369)	\$ (90,309,600)
Affiliate marketing	\$ (15,594,220)	\$ (23,391,331)	\$ (31,578,296)	\$ (42,630,700)
JV Partnership Cost	\$ (2,210,417)	\$ (3,315,626)	\$ (4,476,095)	\$ (6,042,728)
Referral Revenue Share	\$ (851,437)	\$ (1,277,156)	\$ (1,724,161)	\$ (2,327,617)
Brand Licensing	\$ (4,500,000)	\$ (6,750,000)	\$ (9,112,500)	\$ (12,301,875)
Casino Royalty Fee	\$ (564,527)	\$ (846,790)	\$ (1,143,166)	\$ (1,543,275)
Chargebacks	\$ (2,064)	\$ (3,096)	\$ (4,179)	\$ (5,642)
Payment processing fees	\$ (3,283,382)	\$ (4,925,073)	\$ (6,648,848)	\$ (8,975,945)
Distribution Costs	\$ (40,172,631)	\$ (65,525,581)	\$ (102,218,614)	\$ (164,137,382)
Gross Profit / (Loss)	\$ (3,304,770)	\$ 39,364,188	\$ 57,920,122	\$ 76,714,811
Compensation & Benefits	\$ (5,078,449)	\$ (6,348,062)	\$ (7,935,077)	\$ (9,918,846)
Office & General	\$ (498,218)	\$ (622,773)	\$ (778,466)	\$ (973,083)
IT Costs	\$ (3,215,318)	\$ (4,019,147)	\$ (5,023,934)	\$ (6,279,918)
Bank Charges	\$ (266,379)	\$ (332,973)	\$ (416,217)	\$ (520,271)
FX	\$ (779,277)	\$ (974,096)	\$ (1,217,620)	\$ (1,522,025)
Legal & Professional Fees	\$ (609,686)	\$ (762,108)	\$ (952,634)	\$ (1,190,793)
Travel and entertainment	\$ (3,250)	\$ (4,063)	\$ (5,078)	\$ (6,348)
Administrative costs	\$ (10,450,577)	\$ (13,063,221)	\$ (16,329,027)	\$ (20,411,283)
Net Profit / (Loss)	\$ (13,755,348)	\$ 26,300,966	\$ 41,591,096	\$ 56,303,527

Marketing Strategy

For its marketing strategy, Seventip N.V. believes that the most cost-effective ways to penetrate the selected target jurisdictions are digitally, including social media; the Company website and via live poker events and activations. Seventip N.V. believes that the Gaming industry is lagging behind when it comes to focused targeting: it's never been more important to know what your customer wants before they land on your doorstep and to then target players with their preferred events and game types.

Planning, as well as SMART innovation, will be the aim of Seventip N.V. The company runs and continually optimises a 360° customer journey that focuses on customer retention. This will not only improve ROI, but also maximise all traffic and enable the Company to use the data analytically.

Acquisition Plan Phase 1

In terms of approach, we utilise performance-based acquisition campaigns, to raise brand awareness, learn from player behaviours and get us growing in the market to maximise ROI.

Affiliation

Seventip N.V. works with many great affiliates, with new affiliates continually being integrated as partners. The deals are done on an ad-hoc basis, working closely with the partners to know what they're looking for, as well as what has worked best for them and how hard they are willing to work with the Company. Media deals are performance-based and include marketing collateral such as:

- Banners;
- Emails to their database;
- Website advertising takeovers;
- Social media content.

Seventip N.V. is engaged with CellXPert who will be pivotal in helping Seventip N.V. track the performance and impact of each affiliate partner.

Affiliate marketing is and will continue to be one of Seventip N.V.'s primary strategies for entering any market. Taking into account the specific nature of a given region, the business will take advantage of localised expertise to build a network of local affiliates who will promote the company's poker product by earning a small share of the profit generated per player or with a one off pre-negotiated value per acquisition.

Performance Based Affiliate network on email and SMS deals

Databases of potential customers are used to enable the targeting of like minded players with focused campaigns. Affiliates do this via Email and SMS, which yields a strong conversion rate. These campaigns are performance based and are usually paid on a CPA cost model basis, with minimum revenue goals required.

These database networks will receive Seventip N.V.'s promotional campaigns and will be notified in advance of upcoming events to help the Company grow. The campaigns will be monitored and analysed to ensure the affiliates are concentrating on the right demographics that will be most cost efficient for the business.

Content Marketing/PR/Blogs/Themed sites

These methods of marketing go hand in hand with the social media campaigns as the business publishes blog articles with topical information on live events, results and large tournaments, for example. This content will also be shared on social media to help with brand awareness and acquisition. The business publishes articles with focus and strong content that can be pushed on social media, as well as rank well on Search Engine Optimization (SEO). Content marketing is a strong strategy and does work at a fraction of outbound marketing costs providing it is approached methodically.

Social Media

Social media is a big way in which Seventip N.V. reaches existing and potential new customers. Seventip N.V. will target YouTube, Twitter, Instagram, Reddit, and Facebook, among potential additional social media channels we research and find to be effective.

The business will use tools such as Hootsuite or Sendible to control all its pre-prepared social media channels with the relevant information, designs, photos and content.

This will allow the business to measure its social ROI: monitor campaigns for sponsored posts, see how well they perform and make decisions according to this. The business will have massive leverage and it is believed that campaigns will be easy to run and should perform well.

Protect the brand: the business will be able to approve its mention online, thus allowing it to monitor how the brand name is being utilised.

Social Media is important to utilise relevant content, as well as keep fans engaged and have a verified account. One of the tactics from gaming social media accounts is to run competitions or simply ask questions and opinions, as well as do promotions.

PPC & Programmatic Campaigns

Pay per click campaigns, especially for gaming, are going to be highly competitive but provide a great opportunity to heavily target potential new customers as well as retarget existing customers to improve retention and revenue. There are also several tools that will help us keep an eye on these campaigns.

Firstly, identification of the right keywords for the site.

- **Brand terms** – any keywords containing our brand name and trademarked terms.
- **Generic terms** – terms relating to products or services offered.
- **Related terms** – terms that do not directly relate to what you're selling, but that users who want your products or services may be searching for.
- **Competitor terms** – the brand names of competitors who are offering similar products and services to yours.

Programmatic advertising allows for a specifically targeted way to acquire customers as there is the assumption that the person that is viewing your content is on a site that deals/talks about similar topics.

The more optimised the keywords and content, the better ROI from these campaigns.

Retargeting

'Retargeting' is a good way to target potential players that are known to have an interest in the product. With the use of cookies and other tools, the Company can cleverly re-propose itself. This can be done with a self-serving provider or going for a more complete package. Website visitors who are retargeted with display ads are 70% more likely to convert on our Website. In a study that evaluated various strategies in terms of the average lift in search activity generated for an advertised brand, retargeting represented the highest lift in trademark search behaviour at 1,046%. 30% of consumers have a positive or very positive reaction to retargeted ads, vs. 11% who feel negatively about them. Retargeting can boost ad response up to 400%.

SEO

Seventip N.V. will continue to develop SEO as part of its marketing strategy. As a long tail strategy, the Company intends to develop its Google Business account and Wikipedia page. Another factor that the Company uses in its strategy involves using link building that will aim to increase the Company's search engine ranking and to check where competitors are mentioned.

Seventip N.V. is focused on developing a presence in Canada and other unregulated English-speaking markets such as Ireland and New Zealand, as well as emerging markets in Asia and Latin America.

A key advantage of having our own product development, marketing, analytics, and localization and CRM teams working closely together is that it allows us to control the key drivers for our success. This ensures that the Company has the agility and skills to successfully and efficiently launch in newly regulated markets, taking into account local flavours, which allow brands to thrive.

CRM

Seventip N.V. will continue to develop its customer relationship management strategy as part of its marketing strategy. This includes utilising the vendor, Customer.io for marketing campaigns including email sends, newsletters, SMS and push notifications. All messages include gambling warnings and guidelines follow the overall marketing communication controls that follow in the next section.

Marketing Communication Controls

Overview

Seventip N.V. has put procedures in place to ensure that marketing companies and affiliates promoting the website of Seventip N.V. have access to transparent information on our player and campaign specific guidelines, as well as responsible gaming, privacy and protection best practices.

The Policy Statement shall be made available to the affiliates and marketing partners as part of the Terms and Conditions.

Marketing Channels & Sources of Traffic

As an affiliate or marketing partner, it is a requirement to confirm and disclose all marketing channels and sources to ensure they are compliant. This must be agreed with the affiliate account manager before any promotional campaign is launched.

An Insertion Order (a legal agreement between an advertiser and a publisher) must be signed by the affiliate, which indicates the brands being promoted, the type of traffic, the URL from where our brands are being promoted, the campaign start date and commission deal agreed between the affiliate and affiliate account manager.

Forms of Promotional Communication

Our Affiliate Programme requires prior approval by the marketing management team for all of the following marketing opportunities:

- Email Marketing
- Pop Ups and Pop Unders
- SMS Marketing

- Streaming, Twitch, Youtube, Snapchat

The banned options that the Company does NOT work with include but are not limited to:

- Adult Networks
- Underage target websites (cartoons, children's games, etc)
- Piracy Websites, Torrent download webpages

No player data is to be stored by the marketing or affiliate partner. Personal data, however, can be provided if there is approval and acceptance by the user. Any affiliate or Marketing Partners found to be running these activities without prior consent of the marketing team, shall have their account suspended and Revenue Share removed.

At any point, our partners must be able to disclose a complete list of URLs upon our request, shedding light as to where our communications are displayed and promoted.

Age Restrictions

Advertising to minors in any capacity is strictly prohibited. If this is undertaken in any form, the affiliate or marketing partner account will be terminated. Affiliates and marketing partners are not allowed to place any tracking links, banners or creatives in any fashion on websites or marketing collateral aimed at persons under the age of 18 years (or the relevant age limit in the jurisdiction) or otherwise target, whether directly or indirectly, such persons for gambling-related services. Gambling advertising must not appeal to minors in any way. This includes both the messaging and especially the imagery used. Examples include the use of games named after popular children's fairy tales, books, TV series and movies for promotional purposes.

Under no circumstances are minors to be featured in advertising.

Affiliates and marketing partners must place in all promotional material the Under 18 Logo & Gamble Awareness logos. These logos must be placed in the following:

- Website footers
- Social media cover Images
- Social media - in all posts, cover photos and "about" sections
- Affiliate ads and banners of all types and sizes.

In selected media, partners must take appropriate steps when planning their campaigns to understand the likely audience of the media where they intend to place ads. They should also take steps to exclude under-age groups from an audience, especially in cases where tools to do so are available.

Out of Date Offers

Promoting out-of-date offers is considered as misleading advertising. Frequently, affiliate partners inadvertently promote offers that are out-of-date. It is the affiliates responsibility to update all offers once communicated by the Affiliate Marketing Team. Failure to comply will result in account closure. Updating an offer includes:

- The actual offer itself
- Significant Terms
- Any review pages created on the brand in question.

Advertising must be Socially Responsible

Our affiliates and marketing partners agree to promote our brands in a socially responsible manner, by complying with the industry's regulations, codes of practice and guidelines to ensure that all advertising of our brands, games, and associated promotions are clear, transparent and not misleading. It extends and is not limited to the following:

- Must not encourage anti-social behaviour (this includes portraying gambling with the consumption of alcohol).
- Must not suggest that gambling can be a resolution to social, educational, personal, or professional problems.
- Must not suggest that gambling can be an alternative to employment, a solution to financial concerns or a form of financial investment (e.g. "A life-changing win!").
- Must not portray gambling as Socially Attractive.
- Must not portray gambling in a context of toughness or link it to resilience or recklessness.
- Must not portray gambling as indispensable or as taking priority in life, for example over family, friends or professional or educational commitments.

- Must not exploit cultural beliefs or traditions about gambling or luck.
- Must not suggest that solitary gambling is preferable to social gaming (e.g. “Bored at home? Play with us!”).

Significant terms for ads limited by time and space

Our affiliates and marketing partners agree to promote our brands in a socially responsible manner, by complying with the industry’s regulations and codes of practice. These are mandatory for all promotional material. Websites will be regularly checked to ensure significant terms are current.

- a. Age permitted
+18, over 18 only
- b. Targeted offers
Available to select players only
- c. Deposit info
No deposit required / Min deposit \$xx / Max deposit \$xx
- d. Info about offer and promo codes
1st deposit bonus 100% up to \$xxx. 2nd deposit bonus 50% up to \$xxxx, 3rd deposit bonus 25% up to \$xxx. / 10% cashback on losses up to \$xxx /
- e. Wagering requirements (if applicable)
Examples: xxX Wagering requirement
- f. Start date (if applicable)
Offer starts from on xx.xx.2024
- g. Expiry information
xx days to complete wagering / xx-day expiry on Free Spins / Offer expires on xx.xx.2024.
- h. Info about bet limitations
Min bet £xx / Max bet £xx when playing with a bonus (casino only)
Neteller/Skrill deposits excluded from match deposit bonus.

i. Deposit and withdrawal information

Your cash balance and associated winnings (from the cash balance) can be withdrawn at any stage. If you wish to withdraw your cash balance you will be required to forfeit your bonus balance.

j. Game restrictions

Different wager requirements for some games incl. Table Games, Tournaments and certain Slots.

Bonus funds or spins can be played on specific games only.

k. Info about additional terms

Affiliates should display the text “Terms & Conditions Apply”.

Marketing Team Verification Processes

Our affiliates and marketing partners agree to promote our brands in a socially responsible manner, by complying with the industry’s regulations, codes of practice and guidelines to ensure that all advertising of our brands, games, and associated promotions are clear, transparent and not misleading. It extends and is not limited the following:

Trigger	Action
Affiliate Signup on Platform	Review all necessary data is present in the affiliate application such as Address, Website, Contact details, Marketing variant and acceptance of T&Cs.
Provide Sources of Traffic	Review and Approve sources of traffic as per each key market deliberation.
Marketing Collateral Brief to Design Team	Ensure that the necessary terms for each promo are collated to the request and that the necessary logos are included in the output files (E.g. +18 Logo)

Make sure any qualifications and limitations are clear	Qualifying text (small print or footnotes) can be used to clarify a claim in an ad but don't use it to hide important information or in a way that contradicts the headline claim.
Customer has consented to details being provided to third parties	We ask to for consent to pass details to third parties for marketing and name those third parties.
Update Marketing Collateral and Promos	At least once every 30 days an audit must be performed by relevant teams of the URL's/Websites promoting the brand, assuring the adverts running are compliant and updated to our most current promotions
Marketing written Reviews	All reviews must be approved by the affiliate manager prior to posting on websites and or selected media.
Opt-out option must be made available on email or SMS communications.	An opt-out / unsubscribe option must be available for those who are not interested in emails, bonus or SMS offers. Affiliates must seek approval from the Company before sending any SMS or Email marketing campaigns.

Seventip N.V. also encourages its staff to use the checklist provided by ICO at any given time
<https://ico.org.uk/media/fororganisations/documents/1551/direct-marketing-checklist.pdf>

Advertising & Marketing Policy

Seventip N.V. has an Advertising and Marketing Global Policy in place to ensure the business is compliant under the regulatory obligations. The Advertising Policy and Marketing Policy is included in our submission.

The Marketing department ensures adherence to this policy and that the business remains compliant when advertising and/or promoting marketing communications to WPTGlobal customers.

With every new licence application, the Marketing department will ensure to update this policy to include the specific requirements for the said jurisdiction. Compliance will approve the said Policies.

3. MANAGEMENT STRUCTURE

Chief Executive / Managing Director



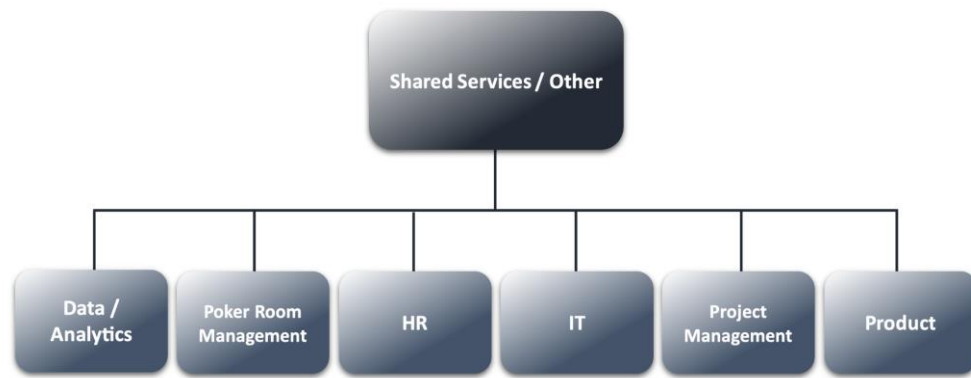
Marketing Director



Operations Director



Shared Services / Others



4. BUSINESS MODEL

Key Officials & Responsibilities

Chief Executive / Managing Director – Stephen Duke

Stephen Duke is a fully qualified chartered accountant with 15+ years of finance experience working across a wide range of industries and businesses including startups and fortune 500 companies.

His CV can be found here: <https://www.linkedin.com/in/stephen-duke-681b391b/>

Stephen is ultimately responsible for all areas of the business and all employees of the company report directly or indirectly to him.

Compliance Officer

Michela Cuschieri holds a Bachelors in Business and IT, and has 5 years experienced in the online gambling industry as a compliance consultant.

Michela shall be responsible for ensuring the company is compliant with all applicable laws and regulations.

Client Contact & Relationship Management

Seventip N.V can be contacted by the Curacao Authority either through the Key Function roles using the details provided below:

Contact	Position	Email Address
Stephen Duke	Chief Executive & Managing Director	stephen.duke@kashxa.com
Michela Cuschieri	Compliance Officer	michelac@diligenzagroup.com

Key Partners

Eventstream Limited (Tech Supplier)

Eventstream, a Maltese Tech reseller has licensed A5 Labs Inc (US Technology Company) platform to Kashxa (being the parent of Seventip N.V). Kashxa maintains a relationship with both the reseller (Eventstream) and the underlying platform owner A5 Labs Inc. Any interruption to A5's Platform provided by Eventstream could be extremely disruptive to Seventip N.V.'s operations, hence the company maintains close and direct contact with A5 Labs representatives. Proactive monitoring of all systems is in place and real-time escalation channels are available for service problems and interruptions. Eventstream provides an SLA to resolve critical issues as quickly as possible.

Kashxa



Kashxa Limited is the parent company of Seventip N.V., based in Cyprus. It employs or contracts with the majority of the people who work on behalf of the company, manages banking and payment service providers, and enters into contracts with suppliers and partners.

There is no realistic risk of an interruption of the services being provided by Kashxa.

Diligenza

Diligenza.

Diligenza serves as our dedicated compliance consultancy firm, specialising in an extensive array of AML and compliance services tailored to our specific needs. Offering bespoke solutions, Diligenza facilitates the development of corporate compliance programs and ensures seamless policy integration across multiple jurisdictions, reflecting their deep understanding of the regulatory landscape. Under the Curacao Regulatory framework, Seventip N.V. engages Diligenza for comprehensive AML and compliance services, benefitting from their provision of a highly experienced MLRO and key function holders for the compliance role. Their expertise and support are pivotal in maintaining our compliance with regulatory standards and enhancing our operational integrity.

World Poker Tour “WPT”



The iconic WPT brand has been at the forefront of poker innovation since 2002. Seventip N.V. secured and finalised a brand licensing agreement with the World Poker Tour and the product operates under the brand ‘WPT Global’. By leveraging one of the best known brands in the industry, Seventip N.V. will exploit the credibility and brand recognition instantly afforded to its product by WPT and acquire customers.

Banking

Alpha FX

Alpha FX Europe Limited is authorized and regulated by the Malta Financial Services Authority for the issuing of electronic money and provision of payment services under the Financial Institutions Act. The company is owned by Alpha Group International plc (LON: ALPH), an entity listed on the London Stock Exchange. AlphaFX is a leading provider of financial solutions

dedicated to corporates and institutions operating internationally. They specialize in FX, offer global accounts for efficient cross-border transactions, and facilitate mass payments.

Payment Execution

Payment Execution s.r.o. is licensed and regulated by the Czech National Bank as a payment institution. Payment Execution is a global payment services provider, specializing in core payments and transaction banking. Their core payment services focus on transaction banking, bank-to-corporate payment connectivity, and their financial supply chain platform.

Interpolitan Money

Interpolitan Money Limited is authorized by the UK's Financial Conduct Authority (FCA) under the Electronic Money Regulations and the Payment Services Regulations for the issuing of electronic money and the provision of payment services. They offer a range of international money transfers, local money transfers, foreign exchange, multi-currency accounts, and international banking platforms for non-resident, private, and corporate clients.

Oneify Money

Oneify is regulated by AUSTRAC in Australia. Oneify offers global financial services, including multi-currency accounts, foreign exchange, and payments to facilitate fund transfers and digital currency exchange services.

BVNK

BVNK is regulated by the Financial Sector Conduct Authority in South Africa, the Financial Conduct Authority in the UK, the Bank of Spain, and the Italian Organismo Agenti e Mediatori. BVNK is a digital currency payments platform enabling entities to send and receive payments globally. BVNK offers features like virtual accounts with unique vIBANs.

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:

1. Exemplary AWS documentation
2. Transparent billing system with no “hidden costs”
3. Effortless scalability and flexibility
4. Integrations with 3rd party services and delivery automation
5. Integrated audit service and high security measures:
<https://aws.amazon.com/security/>
6. Closer to Asia and therefore do not expect latency issues
7. Future plans also include EU expansion and some regulated markets require servers to be in EU
8. 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.

Jumio



The business uses Jumio for the provision of player verification checks on KYC. This ensures that each Identification document is screened for its validity and authenticity when KYC is requested.

- Full Name;
- Age;
- Address;
- PEP & Sanction screening;
- IP Address.

Seventip N.V also uses Jumio services for the uploading of proof of address and this is manually verified by the KYC/Risk team.

Casino providers

We are currently using Bragg Gaming Group as a gaming aggregator so we have access to all the top gaming providers (Pragmatic, Evolution, Bragg games etc).

Bragg Gaming Group



Website: [Playing to Win in the Casino Gaming Industry - BRAGG Gaming Group](#)

Other Third Party Integrations

The below table provides an overview of the vendor/service providers for the following categories and a description of what they do:

- Productivity and Operations;
- Technology & Development;
- Design; and
- BI & Data Science.

Kindly refer to the following page for a full list of third party integrations.

Category	Vendor/Service	Description
Productivity and Operations	Customer IO	CRM automation tool, used for segmenting customers, sending and automating promotional emails, push notifications and SMSes.
	Twilio	SMS provider, used for sending and receiving transactional and marketing text messages.
	FreshDesk	Service required to communicate with the customers by ways of answering customers emails, chats and phone calls.
	Cellxpert	Acquisition tool used to manage affiliate relationships, source for additional traffic source, covering interface and services.
	Devcode	Cashier management tool, fully integrated with our platform. Handling payment processing, setup of payment methods.
	Hexopay	Payment Service provider partner, providing additional payment methods for variety of countries and market coverage.

	Nuvei	Payment Service provider partner, providing additional payment methods for variety of countries and market coverage where partner Hexopay is underperforming.
	Payment method charges and onboarding fees	Payment methods to enable customers to deposit with methods available locally, in conjunction with Hexopay and Nuvei as partners. These charges are direct charges with the variety of payment methods ie. neteller, skrill, luxon etc. They all have integration charges.
	Payment methods reserve - available funds to support customer WDs	The prefunding for the payment methods that are either deposit AND withdrawals (“WD”) or WD only. These payment methods need to have a reserve of funds (prefunded by us) prior to enabling the particular payment method in the cashier.
	Netsuite Finance ERP	Financing tools and systems.
	Jira	Project management tool.
	Confluence	Collaborative and organizational workspace tool utilized to capture all the relevant processes and procedures in one place.
	GSuite (google cloud separately)	Secure access to cloud, aimed towards operational efficiency.
	JUMIO	KYC Verification tool used to verify all players.
	ComplyAdvantage	PEP & Sanction Screening tool used by our Operations team.
	Slack	Internal communication tool for an optimal operational efficiency and collaboration between different business units.

	BitBucket	Code repository for the artifacts/deployment packages of the applications and infrastructure.
Tech & Dev	PagerDuty	Incident response platform for IT departments where support lines and schedules can be configured.
	NewRelic	Monitoring tool for the applications and infrastructure resources.
	XE exchange service OR CurrencyLayer - Shared pool reconciliations	Exchange service for the currencies.
	Cloudflare	Web infrastructure and website security platform that provides content delivery network and DDoS mitigation services where the services occur between a website's visitor and its hosting provider, acting as a reverse proxy for websites.
	Geocomply	Security-related tool for monitoring the true geolocation of players.
	Teamcity	Build management and continuous integration server to automate the deployments.
	OpenVPN	A virtual private network system that implements techniques to create secure point-to-point or site-to-site connections.
	Maxmind	Digital mapping service that provides location data for IP addresses.
	Figma	Vector graphics editor tool for creating UX/UI designs for websites, applications.
Data	Databricks	Massive-scale data engineering and collaborative data science platform.

Bi & Data Science	Segment	Data governance tool where customer data can be collected, unified, and enriched across any app or device.
	Branch	Tool to build personalization features to provide users better experiences by using deep links that store contextual information about user behavior.
	PowerBI	Analytics tool providing various dashboard, trend analysis and advance KPI tracking and measurement

5. RISK EVALUATION & MANAGEMENT

As a relatively new company with an agile, startup mindset, Seventip N.V. has not yet implemented comprehensive audits of non-financial risk or risk management practices such as risk registers. Risk management is the joint responsibility of the Chief Executive and Compliance Officer.

However, financial risk is managed by ensuring we have adequate controls and processes in place to mitigate our risks. The purpose is to ensure accurate accounting records, prevent errors, and detect fraudulent activities. Our controls are manual, automated, or a combination of both. We have implemented a mix of approval, review and segregation of duties across the business.

In the future, our aim is to implement a Compliance Monitoring Program framework to monitor Regulatory obligations and the controls Seventip N.V.'s stakeholders have on file to ensure compliance. Any risks identified will be evaluated and raised with our Chief Executive to ensure the business fixes any non-compliance issues.

6. LEGAL & GOVERNANCE FRAMEWORK

The day-to-day management of Seventip N.V. is carried out by the parent company Kashxa Limited. Kashxa Limited has a board consisting of a sole director, Ekaterini Iounnou, so it is not possible for there to be a board deadlock. Because only one director exists, board meetings are not necessary.

In practice, most day-to-day operational matters are delegated to the Chief Executive / Managing Director. Matters reserved for the Director of Kashxa Limited are:

- Disputes between the Chief Executive and Senior Management team;
- Legally-binding contracts, orders and agreements requiring the director's authorisation or signature.

The Chief Executive and Senior Management team meet multiple times each week, including a formally-organised leadership meeting with other senior staff members once per week. Decisions can be taken in this meeting or outside it, as necessary.

Legal support and advice, to both the board and senior leadership, is provided by Diligenza.

The company does not yet have an Environmental, Social and Governance policy.

7. TARGET KPIs & BUSINESS SUCCESS

The business has the following success targets:

- Net Gaming Revenue (NGR) of \$240m pa by 2026
- Net Profit of \$56m pa by 2026

Additionally, the business intends to grow to be the largest online poker provider by cash game traffic by the end of 2026. This metric is measured by an independent third-party, PokerScout.com. Currently, the business' brand 'WPT Global' is placed third.

	2023 Total	2024 Total	2025 Total	2026 Total
Net Gaming Revenue (NGR)	\$ 35,128,862	\$ 104,889,768	\$ 160,138,737	\$ 240,852,192
Marketing (not inc Affiliate)	\$ (13,166,584)	\$ (25,016,510)	\$ (47,531,369)	\$ (90,309,600)
Affiliate marketing	\$ (15,594,220)	\$ (23,391,331)	\$ (31,578,296)	\$ (42,630,700)
JV Partnership Cost	\$ (2,210,417)	\$ (3,315,626)	\$ (4,476,095)	\$ (6,042,728)
Referral Revenue Share	\$ (851,437)	\$ (1,277,156)	\$ (1,724,161)	\$ (2,327,617)
Brand Licensing	\$ (4,500,000)	\$ (6,750,000)	\$ (9,112,500)	\$ (12,301,875)
Casino Royalty Fee	\$ (564,527)	\$ (846,790)	\$ (1,143,166)	\$ (1,543,275)
Chargebacks	\$ (2,064)	\$ (3,096)	\$ (4,179)	\$ (5,642)
Payment processing fees	\$ (3,283,382)	\$ (4,925,073)	\$ (6,648,848)	\$ (8,975,945)
Distribution Costs	\$ (40,172,631)	\$ (65,525,581)	\$ (102,218,614)	\$ (164,137,382)
Gross Profit / (Loss)	\$ (3,304,770)	\$ 39,364,188	\$ 57,920,122	\$ 76,714,811
Compensation & Benefits	\$ (5,078,449)	\$ (6,348,062)	\$ (7,935,077)	\$ (9,918,846)
Office & General	\$ (498,218)	\$ (622,773)	\$ (778,466)	\$ (973,083)
IT Costs	\$ (3,215,318)	\$ (4,019,147)	\$ (5,023,934)	\$ (6,279,918)
Bank Charges	\$ (266,379)	\$ (332,973)	\$ (416,217)	\$ (520,271)
FX	\$ (779,277)	\$ (974,096)	\$ (1,217,620)	\$ (1,522,025)
Legal & Professional Fees	\$ (609,686)	\$ (762,108)	\$ (952,634)	\$ (1,190,793)
Travel and entertainment	\$ (3,250)	\$ (4,063)	\$ (5,078)	\$ (6,348)
Administrative costs	\$ (10,450,577)	\$ (13,063,221)	\$ (16,329,027)	\$ (20,411,283)
Net Profit / (Loss)	\$ (13,755,348)	\$ 26,300,966	\$ 41,591,096	\$ 56,303,527

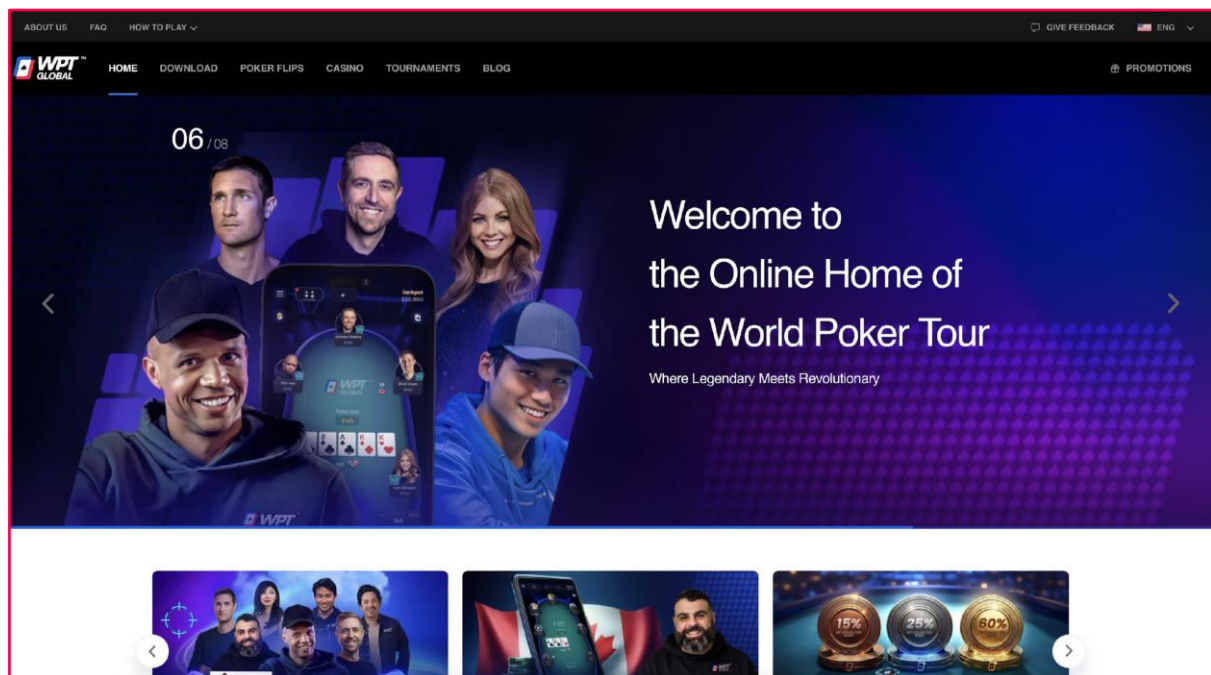
8. SOFTWARE PLATFORM

The software platform is provided by A5 Labs via their subsidiary Eventstream Ltd, which offers Seventip N.V application software via a written agreement. The software code covers the front-end and back end, which includes the gaming application (both desktop and mobile), back office for customer account management, website and landing pages available in different languages, machine learning and AI driven bot and collusion detection to enable clients to maintain fair ecology, and game integrity tools curated and developed by an executive and development team with a track record of previous startup success.

Front-Office Platform

Via the agreement, Eventstream Ltd provides Seventip N.V with the front-end design and creation of the front-office, which will include the WPT brand. The guiding principles for the development of the respective software platforms is creating systems that are user-friendly, modern and reliable. For further details on the front-office, see below screenshots of the website:

Desktop Screen



Mobile Screen



Front-end Management

The following features appear on the home page:

- Full name and address of the registered office;
- The date the current Curacao licence was originally granted;
- The number of existing the licence;
- A statement that the site is regulated in Curacao;
- The Curacao Logo;
- A statement barring those under 18 years old;
- Means by which the company can be contacted at any time by the player.

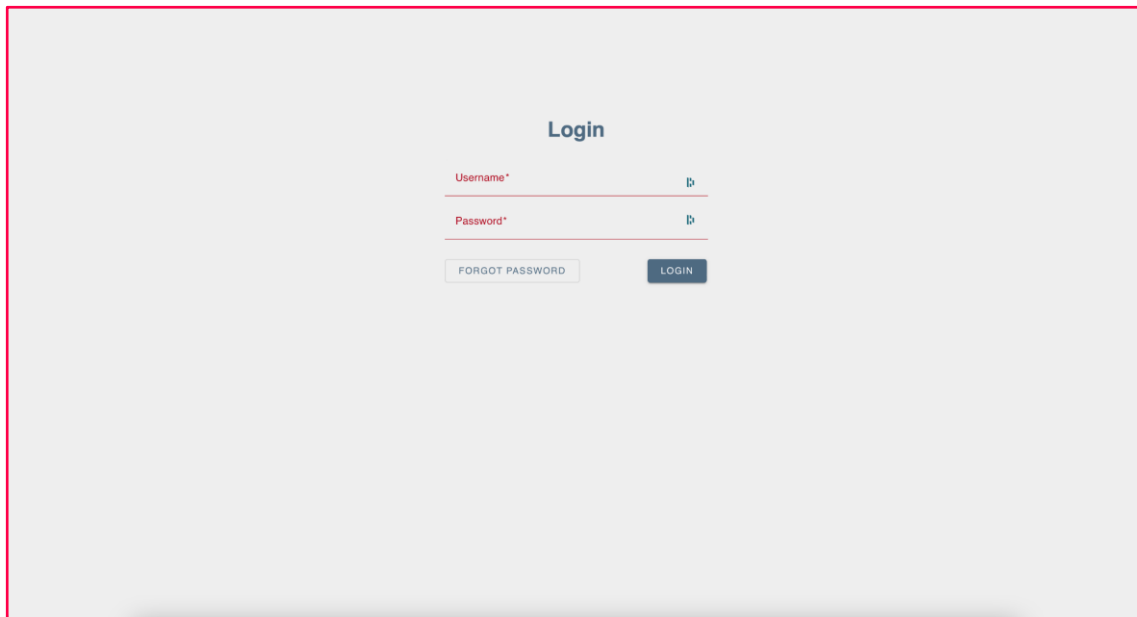
Back-Office Platform

Eventstream Ltd offers Seventip N.V the supply of the back-office platform via an agreement. The back-office system includes a full suite of reporting tools to allow full visibility of game performance and risk management. The system has been designed and developed to be fully compliant with the Curacao reporting requirements and reports can be run on almost any aspect of the site's overall performance and for individual player behaviour. Player activity reports are available detailing customer's betting activity, financial transactions, history etc. In addition, the back-end contains sophisticated tools for CRM, affiliate management, and

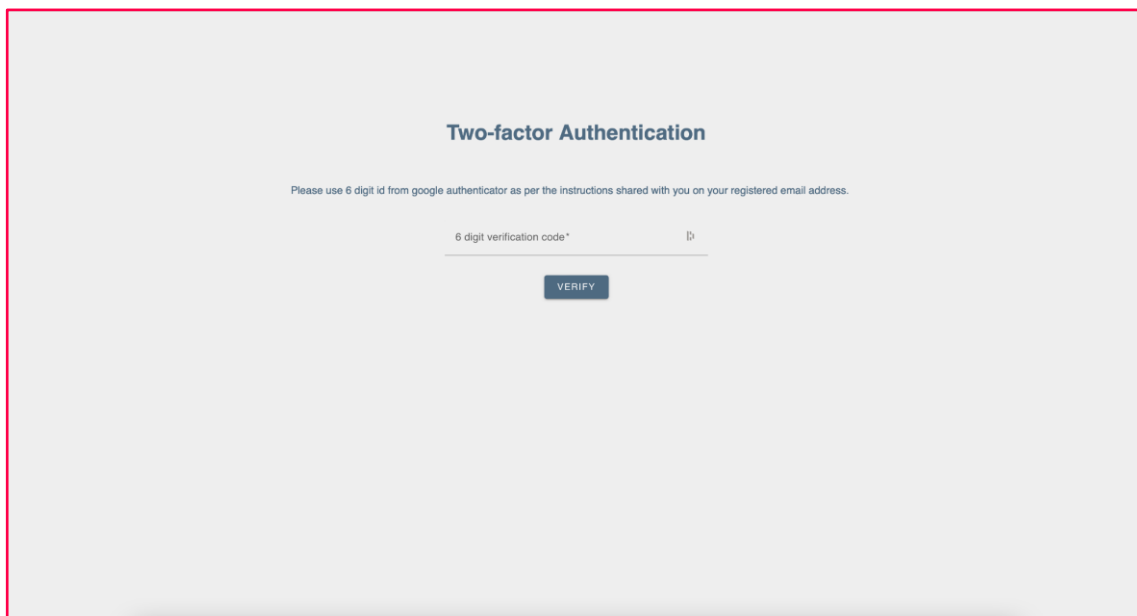
bonus/promotion management. All operational aspects of the business can be controlled and monitored within this platform.

For details of the current platform's features and capabilities, see below screenshots of the demo website.

Login

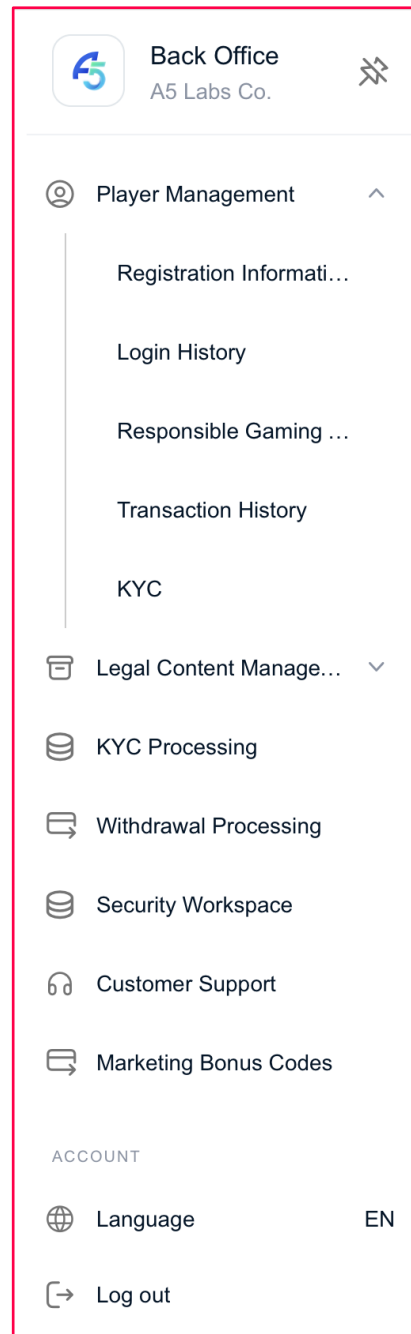


The screenshot shows a login interface with a light gray background. At the top center, the word "Login" is displayed in a bold, dark blue font. Below it, there are two input fields: "Username*" and "Password*", both with red asterisks indicating required fields. Each field has a small blue icon to its right. Below the password field, there are two buttons: a light gray button labeled "FORGOT PASSWORD" and a dark blue button labeled "LOGIN".



The screenshot shows a two-factor authentication interface with a light gray background. At the top center, the text "Two-factor Authentication" is displayed in a bold, dark blue font. Below it, a line of text reads: "Please use 6 digit id from google authenticator as per the instructions shared with you on your registered email address." Below this text, there is a single input field labeled "6 digit verification code*" with a red asterisk and a small blue icon to its right. Below the input field, there is a dark blue button labeled "VERIFY".

Menu



Admin Section - User/Role Management

Back Office AS Labs Co.		Roles		Add	
OVERVIEW					
Login/Access Management ^					
Roles					
Users					
Player Management ^					
Legal Content Management ^					
KYC Processing					
Withdrawal Processing					
Security Workspace					
Customer Support					
Marketing Bonus Codes					
ACCOUNT					
Language EN					
Log out					
Role	Users	Edit	Delete		
Administrator	15				
Customer-Support-Agent	3				
Customer-Support-Manager	23				
LVS-System	0				
newapi-service	0				
Payment-Analyst	2				
Payments-Manager	34				
PBI-Airflow-System	0				
PBI-EVP-System	0				
player-management-api-service	0				

Marketing/Promotions/Affiliate Management

Most marketing and promotional functionality is managed in external third-party systems including but limited to:

- Customer.io
- Cellxpert
- Google Analytics
- Segment.io

The exception currently is bonus code setup, which is done in the back office and is then synced to third party platforms.

Back Office Report Selection

At the time of application, all reports are requested offline and provided by the data teams for the relevant reporting and compliance requirements. These will be incorporated during the coming months into the back office for ad hoc reporting and compliance requirements.

Player Search/List

Back Office

OVERVIEW

Login/Access Management

Player Management

Legal Content Managem...

KYC Processing

Withdrawal Processing

Security Workspace

Customer Support

Marketing Function

Agent Report

VN Agent Report

Game Admin

ACCOUNT

Customer Support Workspace

Manage Label

Add Bulk Action

Download CSV

Batch Transaction

Q Player ID

Q Username

Q First Name

Q Last Name

Q Label

Q Email

Q National ID

Q Registration bonus

Q Phone number

Q Referrer

Q Search

Columns

Back Office

A5 Labs Co.

OVERVIEW

Login/Access Management

Player Management

Legal Content Managem...

KYC Processing

Withdrawal Processing

Security Workspace

Customer Support

Marketing Bonus Codes

ACCOUNT

Language

EN

Log out

Marketing Bonus Code

Q Search by Marketing Code

Type Any

	Marketing Code	Type
☐	Lopes	Register
☐	Bruno	Register
☐	Salas	Register
☐	Ivey	Register
☐	Dwan	Register
☐	FLOP	Register
☐	Botez	Register
☐	Aoki	Register
☐	Neeme	Register
☐	Jaman	Register

Player Profile Screens

Back Office

AS Labs Co.

Back

Customer Support Workspace /

Account Status Active

OVERVIEW

Login/Access Management

Player Management

Legal Content Managem...

KYC Processing

Withdrawal Processing

Security Workspace

Customer Support

Marketing Bonus Codes

ACCOUNT

Language

EN

Log out

Personal Info

First Name

Last Name

D.O.B.

Phone Number

Email Address

Gender

UID

Game Nick Name

Game Platform

Register

Date Of Joining

2FA

Challenge Questions

Home Address

Post Code

County/State

Street Address

Country

City

Financial Info

Account Lock

Unlocked

Deposit Lock

Unlocked

Withdrawal Lock

Unlocked

Initiate Payment KYC

Send Message to Player

Manual Debit/Credit

Comment or add others with @

Workspace All

New First 44

Back Office

AS Labs Co.

Back

Customer Support Workspace /

Account Status Active

OVERVIEW

Login/Access Management

Player Management

Legal Content Managem...

KYC Processing

Withdrawal Processing

Security Workspace

Customer Support

Marketing Bonus Codes

ACCOUNT

Language

EN

Log out

Financial Info

Total Deposit

Total Withdrawal

Current Balance

GGR

Lifetime Bonus

Bonus Ratio

Deposit / Withdrawal Summary

Type Any

Method Any

Finance summary is empty

Transaction History

Type Any

Method Any

Amount Any

Status Any

Transaction list is empty

KYC Info

Account Lock

Unlocked

Deposit Lock

Unlocked

Withdrawal Lock

Unlocked

Initiate Payment KYC

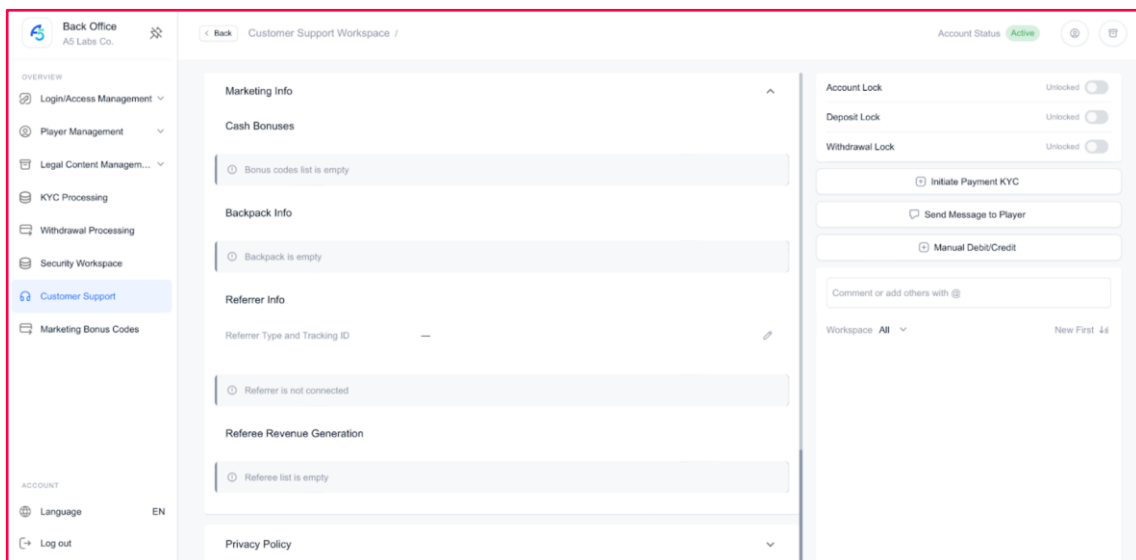
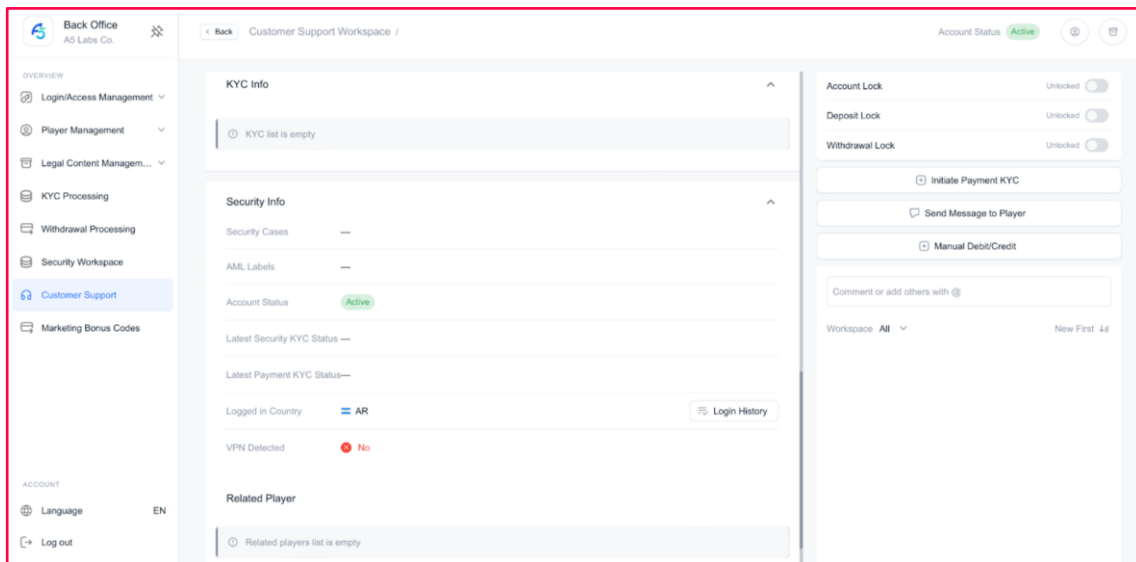
Send Message to Player

Manual Debit/Credit

Comment or add others with @

Workspace All

New First 44



Back Office Management

The Back Office has a comprehensive back-end system that extracts real time data from the front-end and is managed internally.

The back office will report specifically in accordance with the Curacao authority's obligations.

The reports will generate the following data for Poker and Casino:

- the identity of the customer;
- the time the game/tournament started;
- the sums placed by the customer placed in the game/tournament (time-stamped);
- the game/tournament status (in progress, complete, etc.);
- the result of the game/tournament and/or Lottery (time stamped);
- the time the game/tournament ended;
- amount won or lost by customer;
- the balance on the customer's account at the end of the game/tournament;
- the currency used by the customer.

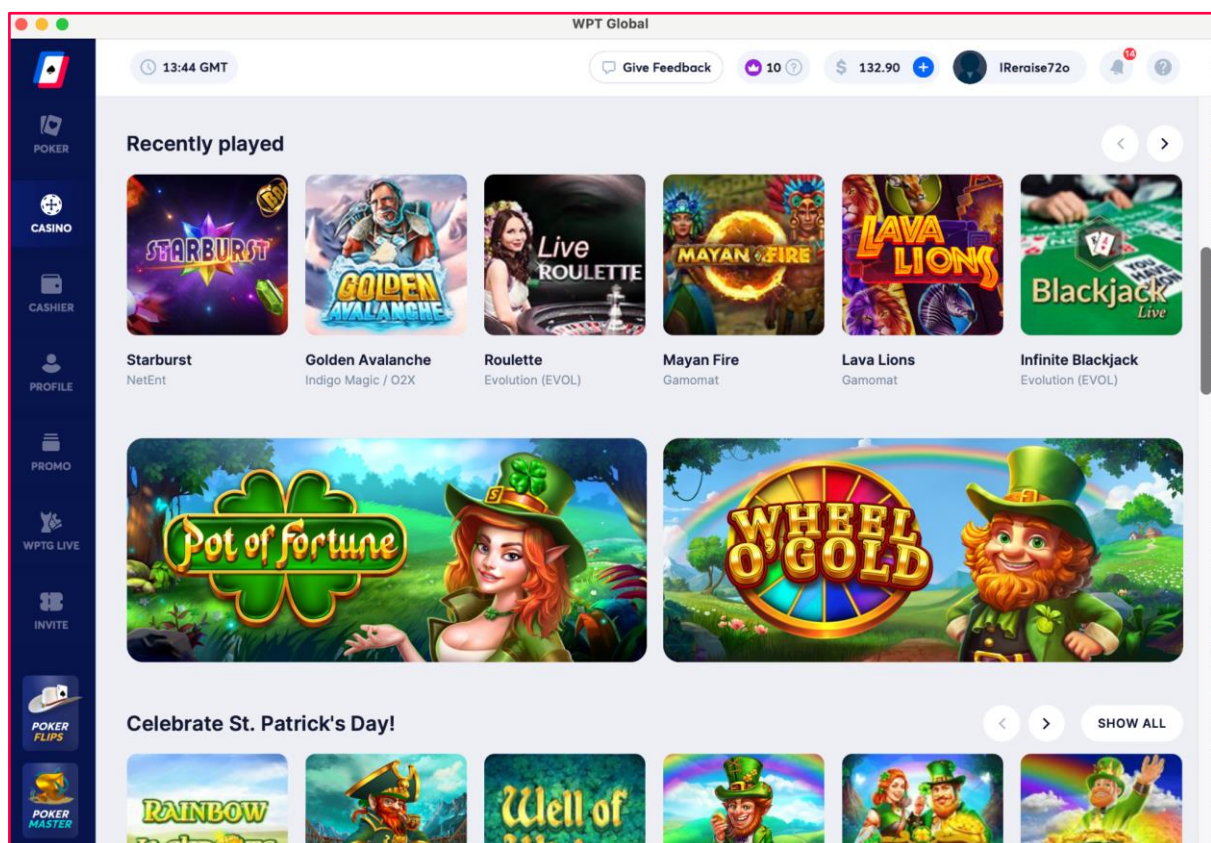
The above data will be stored for a minimum of 5 years.

9. NATURE OF GAMES/OFFERING

Seventip N.V engages with A5 Labs, via its subsidiary Eventstream Ltd for exciting poker games with a safe and lively game playing environment. Eventstream Ltd develops leading-edge security technology and creates innovative real money game designs.

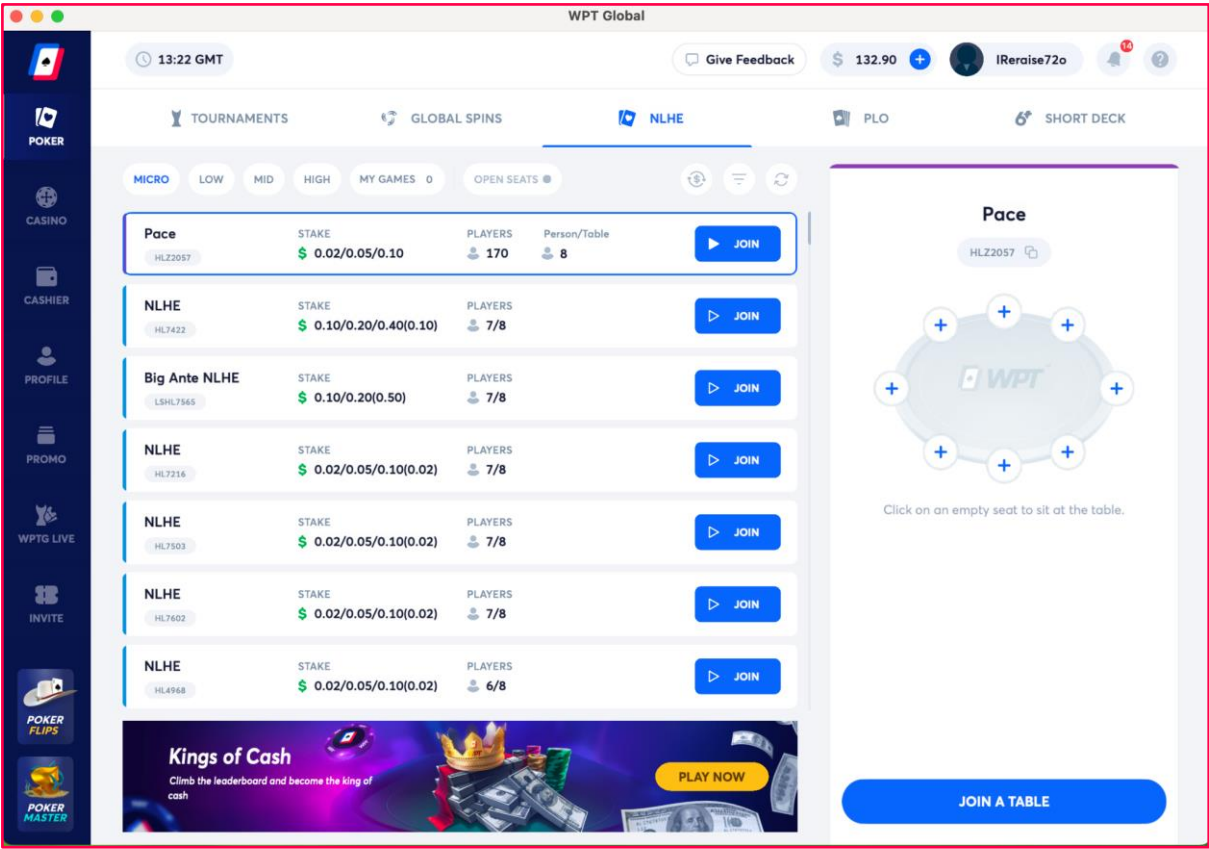
Via the agreement, Eventstream Ltd offers gaming to Seventip N.V to provide a leading casino offering including slots and table games. Eventstream Ltd develops a casino front-end and our gaming providers (Bragg and Gametech) supply the games via their aggregator solutions. Customers benefit from various bonus mechanics including but not limited to free spins, leaderboards, and quests.

Casino



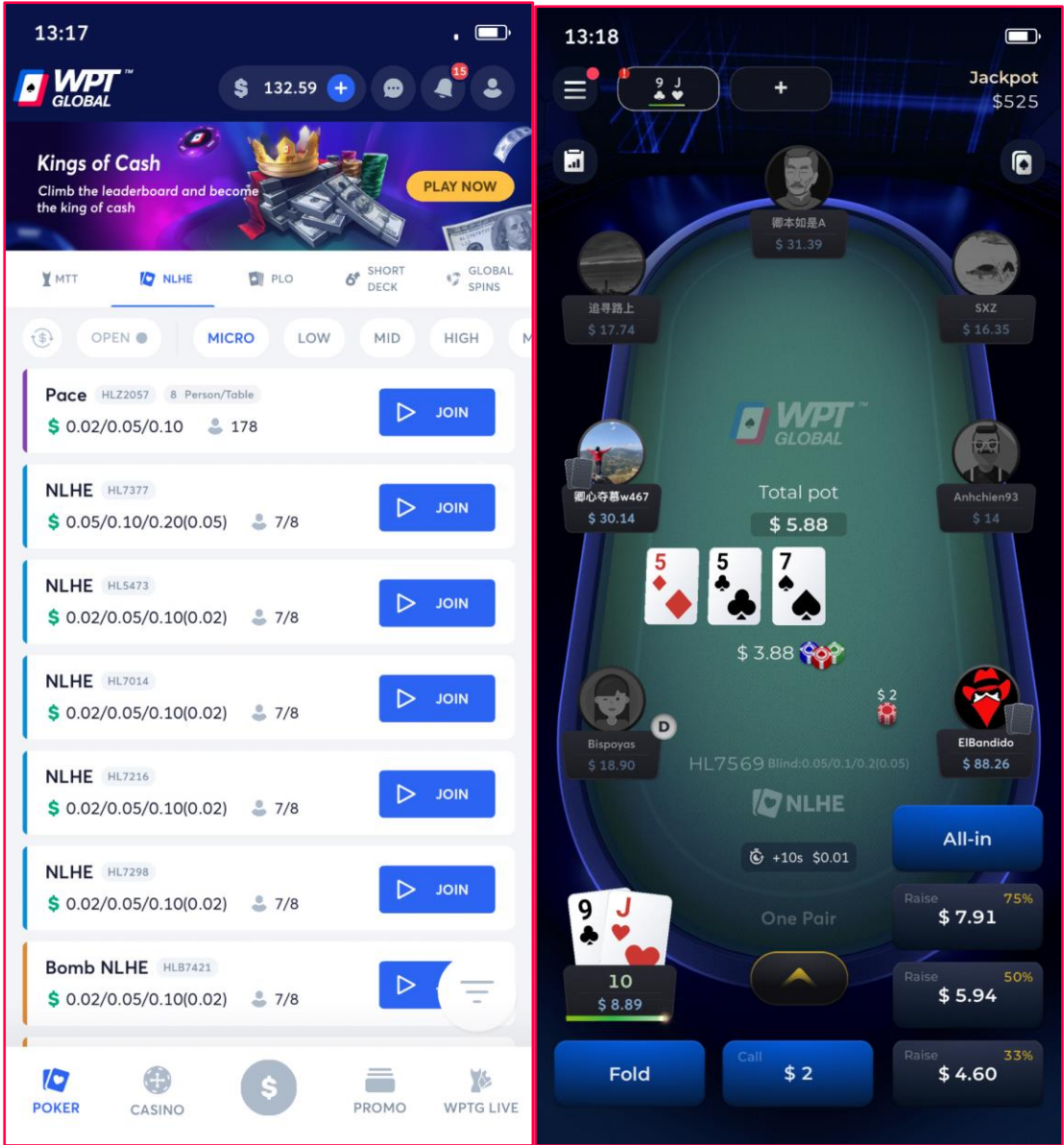
Poker

Desktop Poker Client





Mobile Poker Client



Pokerflips

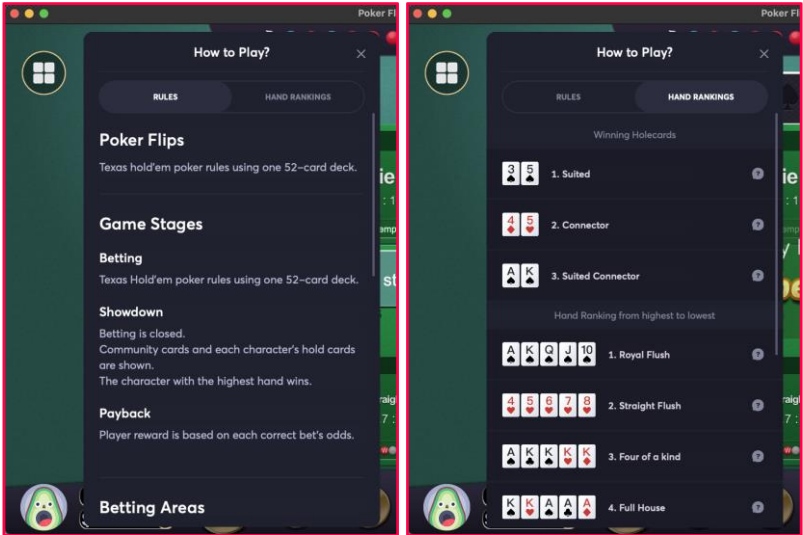
Desktop Pokerflips



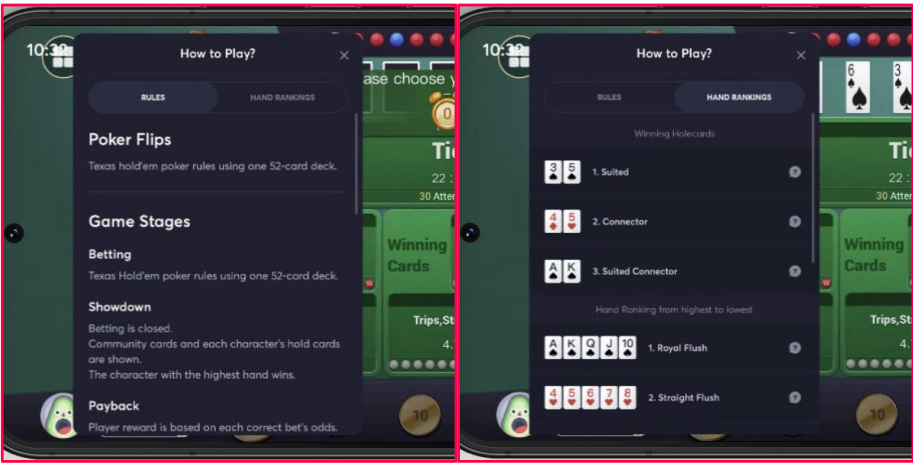
Mobile Pokerflips



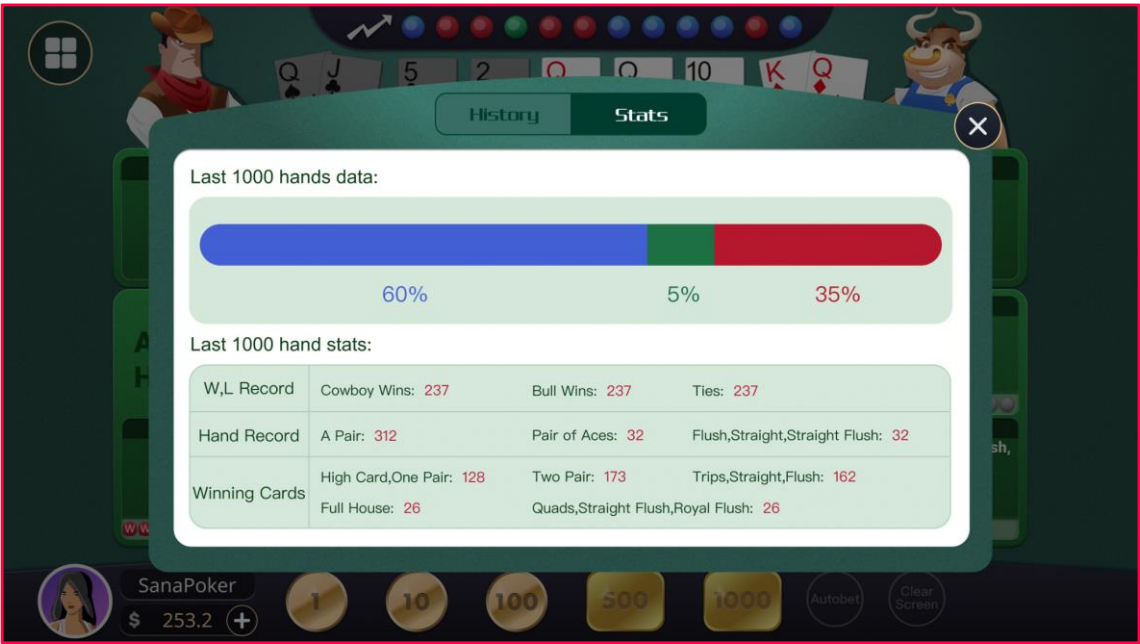
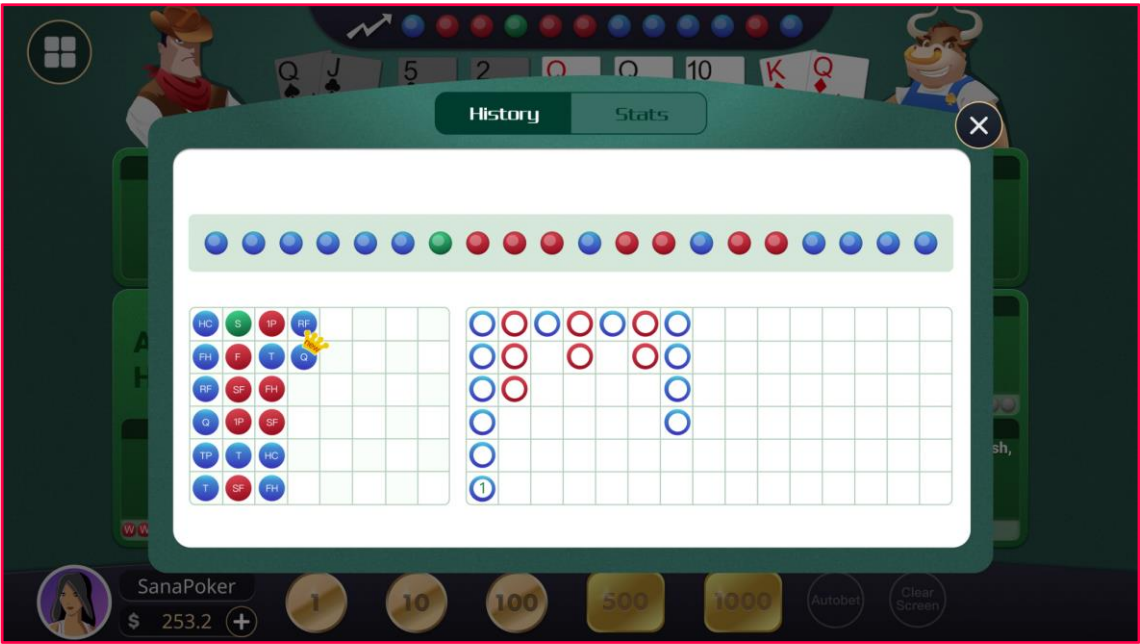
Desktop Game Rules



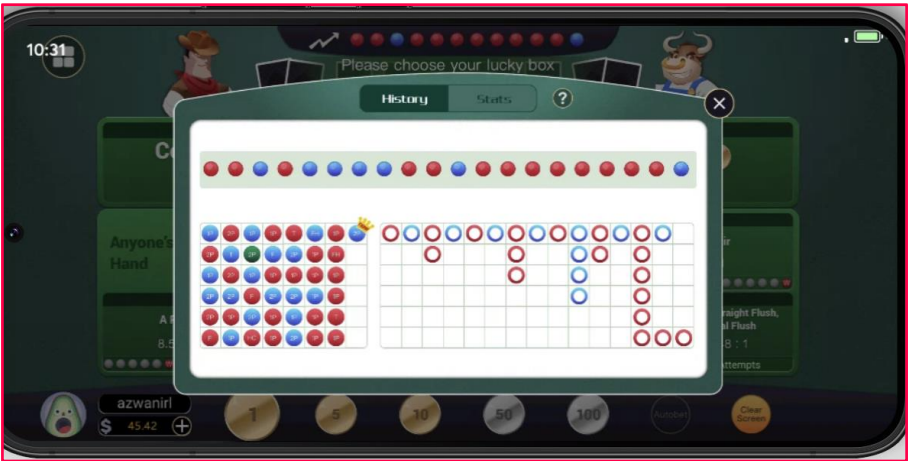
Mobile Game Rules



Desktop Game Statistics and History



Mobile Game Statistics and History



10. PLAYER REGISTRATION CHECKS

Registration Process

Seventip N.V does not enter into, or carry on an ongoing customer relationship, or carry out an occasional transaction with or for a customer unless the customer successfully completes the registration process which includes providing their identity information and accepting the terms and conditions of the website.

Seventip N.V will submit The Verification Policy & Identification Policy and Procedure with the licence application.

Payment Transaction Policy & Procedure

Seventip N.V will submit The Payment Transaction Policy and Procedure with the licence application.

AML/CTF

Seventip N.V takes a zero-tolerance approach to all financial related crimes, and will submit the Anti-Money Laundering and Counter Terrorist Financing Policy with the licence application.

Record Keeping and Retention

Seventip N.V maintains identity records (information, verification and evidence) of all customers and their associated transaction records (between first registration and last activity).

The data will allow Seventip N.V or the authorities to construct an audit trail in the event of any suspicion. All records are confidential and therefore securely held when not being processed.

The MLRO and senior management will have unlimited access to all the records. All data will be stored for at least 6 years after the relationship has ended, however, for any customers

who are the subject of a suspicious transaction report, records will be maintained until such a time that the Financial Intelligence Unit (“**FIU**”) investigator confirms that the records are no longer required and the MLRO agrees to the records being destroyed. Records to be retained by Seventip N.V include, but are not limited to:

- Registration details;
- Identity documents;
- Source of wealth documents;
- Source of funds documents;
- Financial transactions (deposits, bets made, withdrawals, prize payments);
- Suspicious transaction reports;
- Audit trails;
- Suspended accounts and reason for suspension;
- Excluded players; and
- Closed accounts.

11. PRIVACY POLICY

Seventip N.V maintains the utmost available means to ensure that the personal information provided by clients is protected at all times. As such, Seventip N.V has an online policy accessible here: <https://wptglobal.com/privacy-policy>.

12. CUSTOMER SUPPORT & COMPLAINTS HANDLING

Customer support is offered in house, through email or live chat and is available on a 24/7 basis.

Customer Support Tools

The below tools are available to customers:

- FAQ;
- Contact - Chat;
- Contact- Email;
- Betting Rules;
- Terms & Conditions;
- Complaints Procedure; and
- Privacy Notice.

Customer Support Provider

Seventip N.V. will use Freshdesk as the Helpdesk solution.

Customer Complaints

The Complaints procedure will be submitted as part of this licence application.

13. PLAYER PROTECTION

The Responsible Gaming policy & procedure will be submitted as part of this licence application.

14. TERMS & CONDITIONS

Seventip N.V Terms and Conditions are published here: <https://wptglobal.com/terms-and-conditions>

The Terms & Conditions will be updated with the new Curacao requirements once the company receives its licence and the law is enacted.

The below changes will be implemented:

- The general terms and conditions will always be made available to the players, accessible via the footers.
- The terms and conditions will be written in a clear and understandable manner.
- The terms and conditions will include:
 - the date & version number;
 - name, business address and Chamber of Commerce number of the licensee;
 - the obligations of the subscriber before they can open a player account;
 - the conditions under which a player account is closed or access to it is suspended;
 - the conditions under which the distribution of player credits and winnings may be suspended or cancelled;
 - rules on the currency to be used for the bet and the prize money;
 - the retention of all communications related to participation in games for a period specified in the terms and conditions;
 - the ability to set playing and deposit limits;
 - the possibility of self-exclusion;
 - handling abandoned accounts and abandoned balances;
 - the applicability of the law of Curaçao and the jurisdiction of the Curaçao court with regard to disputes between the licensee and the player;
 - a complaints procedure.
- Players will be given the opportunity to review changes to the terms and conditions in a sufficiently clear manner in order to determine whether they wish to continue to

participate in the offered games of chance. The player will be able to access this information from any page of the game website.

15. COMPLIANCE VISIT PROCEDURES

Seventip N.V understands that as a licensed entity, they will be subject to visits from the Curacao Authority to review the compliance procedures.

The following categories will be included in the visit agenda.

- Customer Support;
- Business Continuity and Disaster Recovery;
- Data Protection;
- Duty and Licence Payments;
- Marketing and Advertising;
- Player Registration and Accounts; and
- AML / CFT

Seventip N.V are aware that they will be notified two months in advance of the proposed meeting. The Company will ensure that, as a minimum, the Compliance Officer is present. As the Inspectorate will provide a high-level overview of the areas that are going to be reviewed, Seventip N.V will prepare the information required ahead of the meeting to ensure that the required data can be provided on the day and that the appropriate persons are present.

16. AUDITED ACCOUNTS

Within six months of Seventip N.V accounting year end, the company will submit a copy of its Financial Statements to the Authority as per the regulatory obligations.

The Interim Audits will also be submitted to the Authority as per the regulatory obligations.

17. TECHNICAL CHECKS ON GAMES OFFERED

The games and RNG used by Seventip N.V are certified by an approved testing house. In the case of the main software supplier A5 Labs, providing the poker games, the certification is provided by GLI, proof of which can be found here:

<https://access.gaminglabs.com/Certificate/Index?i=526>

Seventip N.V engages with a range of third-party providers for the supply of gaming content. Before going live with such content, the Company understands that it is required to notify the GSC and seek its approval when launching new products to customers. All the games provided will be certified by a testing house approved by the Authority.

18. POLICIES & PROCEDURES

Seventip N.V is submitting the below documentation as part of the licence application. These Policies and Procedures are maintained internally.

- Information Security Policy
- Responsible Gaming Policy
- Responsible Gaming Procedure
- Verification & Identification Policy
- Verification & Identification Procedure
- Anti-Money Laundering and Counter Terrorist Financing Policy
- Complaints Procedure
- Payment Transaction Policy
- Payment Transaction Procedure

Seventip N.V are committed to transparency and effective communication with the GCB regarding all timelines and updates pertinent to the policies and procedures. Seventip N.V's intention is to maintain open lines of communication, providing regular updates and progress reports to ensure that the GCB is fully informed of developments within an appropriate timeframe.

Regarding the qualifications and competency of the individual/entity responsible for crafting and implementing the policies and procedures, our Senior Management team has diligently assessed their credentials and expertise. Through a thorough evaluation process, we are confident that the selected individuals possess the requisite qualifications, competence, and impartiality necessary for this critical task. Their track record, experience, and absence of conflicts of interest were carefully considered in reaching this determination. Seventip N.V believes, acting reasonably, that their involvement will contribute significantly to the robustness and effectiveness of the policies and procedures in question.