

Operational Manual

Niollo B.V. (156491)

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1. PURPOSE AND SCOPE

This Operational Manual (the “Manual”) sets out the operational framework under which Niollo B.V. (the “Company”) conducts its licensed gaming activities under its Curaçao gaming licence OGL/2024/529/0346. The Manual provides a consolidated description of the operational, technical, compliance, governance, responsible gaming, customer protection and business continuity arrangements supporting the delivery of the Company's gaming services.

The objective of this Manual is to provide regulators, management, employees and service providers with a clear understanding of how the licensed operation functions in practice, how regulatory obligations are fulfilled, and how risks are managed throughout the business.

The Manual applies to all activities performed by or on behalf of the Company, including gaming operations, customer onboarding, anti-money laundering controls, responsible gaming measures, data protection activities, payment processing, technical operations, complaints handling and outsourced services.

Whilst certain functions are performed by third-party service providers, the Company retains ultimate responsibility for compliance with applicable regulatory obligations and maintains effective oversight of all outsourced arrangements.

2. DESCRIPTION OF THE GAMING OPERATION

The Company operates a remote gaming business through a number of consumer-facing websites and brands, offering online gaming products including casino games, live dealer games, sports betting, virtual sports and other games of chance. Players are provided access to gaming products supplied by licensed and certified software providers aggregated through Libita Group Limited, and made available through the gaming platform owned by North South West Limited.

The gaming operation supports the complete player lifecycle from registration through gameplay, deposits, withdrawals, responsible gaming interactions, complaints management and account closure.

Upon registration, players are required to provide identifying information including their full name, date of birth, address, email address and telephone number. Players must confirm that they are at least 18 years of age, are permitted to use the services in their jurisdiction and are not located within any restricted territory.

Following successful registration, players may deposit funds using one of the available payment methods and participate in the gaming products offered on the platform.

The Company operates all gaming products through certified software providers whose games make use of independently tested and certified random number generators ("RNGs") or equivalent approved outcome determination mechanisms. All gameplay activity, transactions and account activity are recorded within the gaming platform to ensure transparency, auditability and regulatory reporting capabilities.

Withdrawals are processed through controlled operational workflows incorporating anti-fraud, anti-money laundering and customer verification controls. Funds are generally returned through the same payment method used for the deposit wherever operationally possible.

3. TESTING AND QUALITY ASSURANCE

The Company maintains a comprehensive quality assurance framework designed to ensure the integrity, fairness and reliability of all gaming products and systems.

Prior to deployment, gaming content must be certified by approved independent testing laboratories. RNG certification, fairness testing and game compliance testing are performed by accredited testing entities before games are made available to players.

Changes to the gaming platform and supporting operational systems are subject to testing procedures prior to release into production environments. Testing activities may include functional testing, integration testing, regression testing and user acceptance testing performed by the relevant technical teams or providers.

Any defects identified through monitoring, testing or operational activities are recorded, prioritised and remediated through established incident and change management procedures.

Management periodically reviews operational performance, supplier performance, system availability and incident reports to ensure the continued quality and integrity of the gaming operation.

4. PLAYER DATA MANAGEMENT

The Company maintains extensive controls governing the collection, storage, processing, retention and protection of player information.

Player information collected during registration and throughout the customer relationship include:

- Personal identification data;
- Contact information;
- Date of birth;

- Payment information;
- Verification documentation;
- Transaction histories;
- Gaming activity records;
- Responsible gaming records;
- AML and KYC records.

Information is stored within controlled operational systems and restricted to authorised personnel on a need-to-know basis.

Access rights are governed through role-based access controls and are reviewed periodically. Technical and organisational security measures are implemented to protect personal information against unauthorised disclosure, alteration, loss or destruction.

Player information is retained in accordance with applicable legal, regulatory and operational requirements. Where account relationships terminate, records continue to be retained in accordance with applicable retention schedules. KYC, AML and transaction records are ordinarily retained for a minimum of five years following termination of the relationship.

5. WEBSITE AND PLAYER INTERFACE

The Company's websites provide players with access to all core gaming services through a secure online interface.

Players may:

- Create and manage accounts;
- Deposit and withdraw funds;
- Access gaming products;
- Set responsible gaming limits;
- Request self-exclusion;
- Submit complaints;
- Contact customer support;
- Review transaction histories;
- Access policy documents and terms and conditions.

The registration journey requires players to provide personal information and accept the applicable Terms and Conditions before participation.

Responsible gaming controls are integrated into the player interface and remain available throughout the customer lifecycle. Players can access self-exclusion tools, account restrictions and support resources directly from their account environment.

6. EXCLUDED AND RESTRICTED PERSONS CONTROLS

The Company maintains controls designed to prevent participation by prohibited or restricted persons.

Age verification controls are implemented to ensure that individuals below the minimum legal gambling age of 18 years cannot access the gambling services. Accounts identified as belonging to minors are suspended and any deposits refunded in accordance with applicable requirements.

The Company also applies jurisdictional restrictions designed to prevent participation from prohibited territories and makes use of technical controls to identify and prevent attempts to circumvent geographical restrictions.

Customers are screened against sanctions lists and politically exposed person databases. Sanctions matches result in immediate escalation, account restrictions and regulatory reporting where required.

The Company additionally supports self-exclusion arrangements and responsible gaming restrictions that allow players to voluntarily restrict access to gambling services.

7. TECHNICAL INFRASTRUCTURE

The licensed operation is supported by resilient hosting and technology infrastructure provided through Flutter Networks N.V.

Primary production systems operate within enterprise virtualisation environments supported by VMware ESXi infrastructure hosted within the TW1 (RDGE) environment. Physical infrastructure includes redundant server clusters, SAN switching infrastructure, storage area networks and supporting operational systems. The hosting environment supports gaming applications, databases, deployment services and operational monitoring systems.

The database architecture incorporates high-availability design principles consisting of primary databases, replica databases, dedicated backup databases and snapshot environments. Multiple MySQL 8.4 database clusters support the production environment and provide operational resilience.

Technical infrastructure is continuously monitored and maintained by the relevant operational and technical teams.

8. BUSINESS CONTINUITY AND DISASTER RECOVERY

The Company maintains documented business continuity and disaster recovery arrangements designed to ensure the continued operation of critical gaming services and the protection of player information in the event of operational disruption.

The organisation employs a geographically redundant disaster recovery strategy across two primary data centres: MT1 (PLNG) and TW1 (RDGE). Production database workloads hosted within either environment are continuously replicated to the alternate location. Databases hosted within MT1 are replicated in near real time to TW1, and databases hosted within TW1 are replicated to MT1. This architecture ensures that a current standby copy of each production database is available at a geographically separate location.

In addition to the cross-site replication arrangement, each data centre incorporates internal redundancy consisting of primary database instances, replica database servers, dedicated backup servers and database snapshot environments. This layered approach provides protection against hardware failures, software failures and site-level incidents.

Database backups are generated daily from dedicated backup servers and consist of one full backup and two incremental backups. Backup data is securely transferred to Amazon S3 cloud storage for off-site retention. Hourly transaction log backups are also generated and archived to Amazon S3 to minimise the potential loss of transaction data and support granular recovery capabilities.

The combined use of geographically separated sites, real-time replication, database snapshots, dedicated backup infrastructure, scheduled backups and transaction log retention provides a robust disaster recovery framework designed to achieve low recovery point objectives and support the continuity of licensed operations.

9. RESPONSIBLE GAMING

Responsible gaming principles are embedded throughout the customer lifecycle and form an integral part of the company's operational framework.

Players are provided with access to responsible gaming controls including self-exclusion mechanisms, account restrictions, cooling-off tools and customer support channels. The platform allows players to manage their gambling activity and seek assistance where necessary.

Player activity is subject to both automated monitoring and manual review. Monitoring activities consider gameplay behaviour, transaction activity, account usage patterns and

indicators that may suggest gambling-related harm or financial vulnerability. Where elevated risk indicators are identified, the case may be escalated for review by specialist teams who may implement additional protective measures, restrict account functionality or close the account where necessary.

Responsible gaming monitoring is closely aligned with anti-money laundering monitoring processes, recognising that certain behavioural indicators may represent either gambling-related harm or financial crime concerns and therefore require further investigation

10. TERMS AND CONDITIONS GOVERNANCE

The Company maintains documented Terms and Conditions governing all player interactions. Terms and Conditions are subject to version control procedures and are reviewed periodically to ensure continued compliance with regulatory requirements.

Amendments are approved through internal governance procedures before publication, in line with the regulatory Policy Guideline on Terms and Conditions. Updated versions are made available to players via the website and players are informed of significant changes where required.

11. COMPLAINTS AND DISPUTE RESOLUTION

The company maintains a formal complaints management process to ensure that player complaints are handled fairly, consistently and within reasonable timeframes.

Players may submit complaints through Customer Support channels (live-chat) and through the dedicated Player Complaint Submission Form made available via the Help Centre. Complaints are initially handled by Customer Support personnel and escalated where further investigation or management review is required.

The company aims to resolve complaints as quickly as possible and ordinarily within fourteen business days. All complaints are logged and tracked through internal systems to ensure appropriate oversight, escalation and record retention.

Where a player remains dissatisfied following completion of the internal complaints process, the dispute may be referred to CADRE, which acts as the company's approved Alternative Dispute Resolution provider. Decisions issued through the CADRE process are binding on both parties in accordance with the applicable procedural rules.

12. RECORD KEEPING AND RETENTION

The Company maintains comprehensive operational, financial, KYC, AML, responsible gaming and complaints records.

Records are securely maintained and protected from unauthorised alteration or destruction. Retention periods reflect regulatory and operational requirements, with AML-related records generally retained for a minimum of five years following account closure.

13. CRITICAL INFORMATION AND TRANSACTION RECORDS

The Company maintains detailed records of:

- Player profiles;
- Deposits;
- Withdrawals;
- Gaming transactions;
- Account activity;
- Audit logs;
- KYC documentation;
- Responsible gaming interactions;
- Complaint records.

These records remain accessible for regulatory inspections and internal investigations.

14. DATA CENTRES AND HOSTING ARRANGEMENTS

The licensed operation utilises geographically separated hosting infrastructure supporting high availability and disaster recovery capabilities.

Hosting services are provided through Flutter Networks N.V. Production databases operate across the TW1 (RDGE) and MT1 (PLNG) environments with continuous replication between both sites. Off-site backups are stored within Amazon S3 storage infrastructure and support disaster recovery objectives.

15. OUTSOURCING AND THIRD-PARTY OVERSIGHT

The Company utilises a controlled outsourcing model for certain operational functions while retaining ultimate responsibility and oversight for all activities performed under its gaming licence.

The back-end platform is operated by North South West Limited, which provides the technical platform infrastructure supporting the gaming operation. The game content from third parties is supplied to the Company through Libita Group Limited (aggregator).

Payment processing activities are facilitated by Tempo Agra Limited, together with various authorised payment service providers. The precise payment service providers utilised may vary from time to time based on operational requirements and market availability.

Infrastructure hosting services are provided by Flutter Networks N.V., which supplies the hosting environment supporting the licensed operation.

Specialist AML and KYC operational services are outsourced to Simplicity Malta Limited. The outsourced risk team performs customer due diligence reviews, enhanced due diligence assessments, transaction monitoring activities and other operational AML controls under the oversight of the Company.

Alternative dispute resolution services are provided by CADRE, which acts as the independent external dispute resolution body available to players following exhaustion of the internal complaints process.

All material outsourced arrangements are subject to ongoing oversight by management and compliance personnel. Supplier due diligence is conducted prior to onboarding, with periodic reviews undertaken thereafter to assess regulatory standing, service delivery, operational performance and ongoing suitability. The company retains responsibility for regulatory compliance and maintains sufficient supervision over outsourced providers to ensure that licensed activities are performed in accordance with applicable Curaçao regulatory requirements.

16. GOVERNANCE, RISK MANAGEMENT AND REGULATORY COMPLIANCE

The Company maintains governance arrangements designed to ensure compliance with applicable legal and regulatory requirements.

Operational performance, regulatory risks, supplier performance, responsible gaming controls, complaints handling and AML monitoring activities are subject to ongoing oversight by management and compliance personnel.

The Company maintains documented policies and procedures governing anti-money laundering, customer due diligence, information security, responsible gaming, complaints handling and operational resilience. These policies are periodically reviewed to ensure continued effectiveness and regulatory alignment.

17. CONCLUSION

This Manual has been developed to provide a comprehensive overview of the manner in which the Company conducts and oversees its licensed gaming operations. It describes the operational, technical, compliance and governance arrangements that support the delivery of the Company's services and demonstrates how regulatory obligations are embedded throughout the player lifecycle and wider business operations.

The Company is committed to maintaining a secure, fair and responsible gaming environment through the implementation of effective controls relating to customer onboarding, anti-money laundering and counter-terrorist financing measures, responsible gaming, data protection, technical resilience, complaints management and third-party oversight. These controls are supported by documented policies, procedures, monitoring activities and governance processes designed to ensure the ongoing integrity and sustainability of the licensed operation.

As the business, regulatory landscape and technological environment continue to evolve, this Manual will be subject to periodic review and update to ensure that it remains accurate, relevant and reflective of the Company's operational practices. The Company remains committed to maintaining high standards of compliance, operational excellence and customer protection, whilst ensuring that all licensed activities are conducted in accordance with applicable Curaçao gaming legislation and regulatory expectations.

This Operational Manual should be read in conjunction with the Company's supporting policies, procedures and operational documentation, which collectively form the control framework governing the licensed operation.