

Segregation Policy

1.Introduction

Company GBL Solutions N.V. a regulated online operator operating under Curacao and European standards, is committed to protecting client funds and ensuring the highest level of compliance with regulatory requirements. This policy defines the processes and measures in place to separate operational funds from client funds, ensuring transparency, trust, and security in all financial operations. Ramtinar Techconsult Limited, Cyprus company with registered number HE412602, acts as the Payment Agent on behalf of GBL Solutions N.V. All client funds remain safeguarded under this Policy, with clear separation from operational funds to ensure transparency, trust, and security in all financial operations.

2.Objectives of the Policy

- 2.1. To ensure a clear and strict separation between client funds and company operational funds.
- 2.2. To maintain compliance with all applicable regulations related to safeguarding client assets.
- 2.3. To build transparency and reinforce client confidence in our financial practices.

3. Account Segregation Overview

3.1. Operational Account:

- This account is reserved for the company's internal financial operations, including:
- Payment of company taxes.
- Employee salaries.
- Business-related commissions and expenses.

3.2. Segregated Client Account:

- This account is strictly utilized for managing client funds, including:
- Client deposits.
- Processing fiat transactions.

- Withdrawal requests initiated by clients.
- May be held either directly in the name of GBL Solutions N.V. or, where applicable, in the name of Ramtinar Techconsult Ltd (Payment Agent), always for the exclusive benefit of clients and in accordance with this Policy.

Key Principle: The financial flows between the operational account and the segregated client account are entirely independent. Client funds are never used for the company's operational purposes.

4.Safeguarding Measures

4.1. Documentation: Comprehensive documentation is maintained for all transactions involving client funds.

4.2. Regular Monitoring: Financial transactions are consistently reviewed to ensure compliance with segregation policies.

5.Roles and Responsibilities

5.1. Employees: Ensure full compliance with this policy in all financial activities.

5.2. Management Team: Responsible for implementing this policy and allocating sufficient resources for its enforcement.

5.3. Compliance Officer: Monitors compliance with the segregation policy, oversees transactions, and communicates with regulators when necessary.

5.6. Regulatory Compliance

Company GBL Solutions N.V. complies with all relevant financial and regulatory requirements, including:

- EU Anti-Money Laundering Directives.
- General Data Protection Regulation (GDPR).
- Financial regulations applicable within Curacao and other jurisdictions where the company operates.

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A handwritten signature in blue ink, consisting of a large, stylized 'S' followed by a diagonal line and a horizontal stroke.