

OPERATIONAL MANUAL

Curaçao Gaming Control / Gaming Authority Submission Document

Online Gaming Operator: Bizbon N.V. (hereinafter –the “Applicant”), a company registered and established under the Law of Curacao, registration number 141081, registered address: Dr. M.J. Hugenholtzweg 25, Unit 11, Curacao, D.W.I., licensed and regulated by The Curacao Gaming Control Board under License: OGL/2024/597/0249.

Domains operated: mostbet.com; betandreas.com.

1. INTRODUCTION

This Operational Manual describes the systems, procedures, controls, and governance framework implemented by the Applicant to operate remote gaming services under a Curaçao gaming license.

The Applicant is committed to ensuring:

- Integrity and fairness of all gaming operations
- Compliance with applicable Curaçao regulatory requirements
- Robust Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) controls
- Protection of players and promotion of responsible gaming
- Security, resilience, and integrity of technical infrastructure

2. SCOPE OF GAMING OPERATIONS

The Applicant provides remote gambling services including:

2.1 Casino Gaming

- Random Number Generator (RNG)-based games including slots, roulette, blackjack, baccarat, poker variants, and virtual table games
- Live dealer casino games streamed in real time from certified studios

2.2 Sports Betting

- Fixed-odds pre-match betting
- In-play (live) betting markets
- Futures, proposition bets, and special markets
- Risk-managed pricing and trading systems

3. GAME FAIRNESS AND OUTCOME DETERMINATION

3.1 RNG Systems

All RNG-based games are governed by certified Random Number Generator systems designed to ensure statistical unpredictability and fairness.

3.2 Certification

RNG systems and game logic are subject to independent certification by recognized testing laboratories (e.g., eCOGRA, iTech Labs, GLI or equivalent).

3.3 Outcome Determination

- Casino games: determined by certified RNG or live physical outcomes (for live dealer games)
- Sports betting: determined by official and verifiable sports data providers

3.4 Integrity Controls

- Continuous outcome logging
- Tamper-proof audit trails
- Real-time game monitoring and anomaly detection

4. PAYMENT METHODS AND FINANCIAL FLOWS

4.1 Accepted Payment Methods

- Credit and debit cards (subject to issuing bank acceptance)
- Bank transfers (SEPA / SWIFT)
- E-wallets (where available by jurisdiction)
- Cryptocurrency payments (e.g., Bitcoin, Ethereum, USDT where supported)

4.2 Withdrawal Processing

- Withdrawals are processed to verified payment instruments only
- Standard processing timeframe: 0–72 hours subject to KYC/AML clearance
- Closed-loop policy applied where technically feasible

4.3 Financial Safeguards

- PCI DSS-compliant payment infrastructure
- End-to-end encryption (TLS 1.2 or higher)
- Fraud detection and transaction monitoring systems

5. BETTING LIMITS AND RISK CONTROLS

- Minimum stake: €0.10 equivalent

- Maximum stake: €10,000 per bet/spin (game-dependent)
- Sportsbook exposure limits applied dynamically based on risk management models
- VIP limits subject to enhanced due diligence and compliance approval

6. RETURN TO PLAYER (RTP) AND PAYOUT POLICY

- Casino RTP ranges typically from 94% and above depending on game configuration
- Sportsbook margin varies between 2% and 8% depending on market type and liquidity
- Progressive jackpots are funded through pooled contributions
- Payouts are executed automatically where possible, subject to AML and fraud controls

7. TECHNICAL INFRASTRUCTURE

7.1 System Architecture

The platform operates on a distributed cloud-based microservices architecture comprising:

- Front-end gaming applications
- Backend services (wallet, gaming engine, sportsbook engine)
- API gateway layer with authentication and throttling controls

7.2 Data Security

- Information security is maintained according to the Information Security Policy (Appendix 6)
- Encryption at rest (AES-256)
- Encryption in transit (TLS 1.2+)
- Segregated storage for personal, transactional, and gaming data

7.3 Access Controls

- Role-based access control (RBAC)
- Multi-factor authentication for administrative access
- Strict segregation of duties

8. DISASTER RECOVERY AND BUSINESS CONTINUITY

8.1 Objectives

- Recovery Time Objective (RTO): 4 hours
- Recovery Point Objective (RPO): 15 minutes

8.2 Measures

- Hot standby infrastructure in secondary cloud region
- Automated failover mechanisms

- Encrypted daily backups stored offsite
- Quarterly disaster recovery testing and validation

9. QUALITY ASSURANCE AND MONITORING

- Continuous system monitoring (24/7)
- Automated alerts for system anomalies and transaction irregularities
- Monthly RNG integrity verification
- Quarterly independent audits of gaming systems
- Bi-annual penetration testing conducted by certified security providers

10. PLAYER PROTECTION AND ACCESS CONTROLS

10.1 Age Verification

- Mandatory minimum age requirement of 18 years or legal gambling age in jurisdiction
- Identity verification required prior to withdrawal approval

10.2 Geographic Restrictions

- IP geolocation controls to prevent access from restricted territories
- VPN and proxy detection technologies deployed

10.3 Sanctions and AML Screening

- Real-time screening against international sanctions lists
- Politically Exposed Persons (PEP) identification and enhanced monitoring

10.4 Excluded Persons

- Enforcement of self-exclusion lists
- Cooling-off periods and permanent exclusion options

11. RESPONSIBLE GAMING FRAMEWORK

The Applicant implements a Responsible Gaming Program as per Appendix 3 including:

- Deposit limits (daily, weekly, monthly)
- Loss and wagering limits
- Session duration alerts and reality checks
- Time-out and self-exclusion tools
- Access to responsible gambling support resources

All responsible gaming tools are accessible directly from the user account interface.

12. TERMS AND CONDITIONS (SUMMARY STRUCTURE)

The Operator maintains formally documented Terms and Conditions as per Appendix 1 covering:

- Account registration and eligibility requirements
- Bonus terms and wagering conditions
- Payment, deposit, and withdrawal rules
- Prohibited behaviors (fraud, collusion, abuse, chargeback misuse)
- Account suspension and termination provisions
- Limitation of liability clauses
- Governing law: Curaçao

The full Terms and Conditions document is version-controlled and periodically reviewed.

13. DISPUTE RESOLUTION AND COMPLAINTS PROCEDURE as per Appendix 6

13.1 Internal Resolution Process

- Initial complaint submitted via customer support channel
- Acknowledgement within 24 hours
- Investigation and resolution target: 5–10 business days

13.2 Escalation Process

- Level 1: Customer Support Team
- Level 2: Compliance Department
- Level 3: Independent dispute resolution or arbitration (where applicable)

13.3 Record Keeping

- All disputes logged with full audit trail
- Communication history preserved for regulatory review

14. RECORD KEEPING AND DATA RETENTION

14.1 Player Records

KYC documentation

- Account activity logs
- Responsible gaming preferences
- Communication records

14.2 Gaming Records

- Bets placed (timestamped and user-linked)
- Game outcomes and results

- Bonus usage and wagering progress

14.3 Financial Records

- Deposits and withdrawals
- Chargebacks and reversals
- Fraud detection reports
- AML suspicious activity reports (where applicable)

14.4 Retention Period

All records are retained for a minimum of 5–10 years in accordance with applicable regulatory requirements.

15. COMPLIANCE DECLARATION

The Applicant confirms that its operations are designed to comply with:

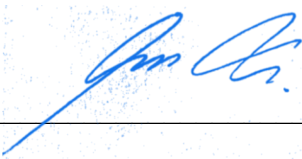
- Applicable Curaçao licensing requirements
- International AML/CTF standards (FATF-aligned principles)
- Data protection and privacy best practices
- Industry standards for fairness, transparency, and security

The Applicant commits to continuous improvement of its compliance, security, and responsible gaming framework.

ADOPTED and APPROVED

on 1 January 2026

by sole director Odin Trust B.V.



APPENDICES (as may be updated from time to time to stay compliant):

1. General Terms
2. Sports Rules
3. Responsible Gaming
4. Privacy Policy
5. KYC Policy
6. Complaints Policy
7. Information Security Policy