

Westward Way Tech N.V.



3 - year Business Plan

2024 - 2026

Contents

Business Overview, Products, Services, Brands & Proprietary IP.

Company Management Structure, Key Management Roles & Reporting Lines.

Key Suppliers and Material Dependencies

Risk Evaluation & Management.

Data Protection and Privacy Policy for Westward Way Tech N.V.

Diversity and Inclusion Policy for Westward Way Tech N.V.

Operational Risk Management Policy for Westward Way Tech N.V.

Vendor Management Policy for Westward Way Tech N.V.

Product Development Policy for Westward Way Tech N.V.

Financial Control Policy for Westward Way Tech N.V.

Customer Service Policy for Westward Way Tech N.V.

Anti-Money Laundering and Anti-Terror Financing Policy for Westward Way Tech N.V.

Business Overview, Products, Services, Brands & Proprietary IP.

Introduction

Westward Way Tech N.V. is an online gaming start-up established in 2021. The company's mission is to leverage the extensive experience of its board and operational management within the online gambling industry, aiming to generate incremental value for the company and shareholders.

Success will be achieved by implementing best practices and deploying innovative customer acquisition and retention strategies.

The business is focused upon creating competitive advantage across established and emerging markets.

Products & Services

Westward Way Tech N.V. aims to provide immersive gaming experience to its clients via quality content and offer player experience enrichment by using latest gamification technologies, tournaments, draws, airdrops and leader boards etc.

Product is split into 6 distinct areas, sportsbook, slots, live dealer, crash games, live games and bingo. Every area has their own subcategories and further split as;

- Sportsbook into two as; pre-match and in-play,
- Slots as video slots, classic slots, buy-in feature slots, jackpot slots, classic slots, and slingo,
- Live dealer into several categories depending on the provider; most prominent ones are table games (roulette, blackjack, baccarat, casino hold em, dragon tiger, sic bo, etc.) and game shows (wheel of fortune type of games),
- Crash games are mainly provably fair games; which are covering crash, mines, plinko and some similar mechanic games which are often referred to skill games also.
- Live games are mainly streamed games of chance; which are wheel of fortune, coin flip, roulette, bet on colours of roulette, hi lo, etc.,
- Bingo into 4, Live Bingo, RNG Bingo, Live Dealer Bingo Derivatives, Bingo Slots and Virtual Bingo / Scratch card.

The player experience enrichment will be done via implementing all game content within the promotional system in an integrated way, so the gameplay contributions can increase the chances of the players to earn more via participating into monthly or weekly tournaments, rebates, leader boards and rake backs.

Brands & Proprietary IP

Westward Way Tech N.V. brands are: k8.io, k8.com, k8.game, j9.io, j9.com and k8casino.io.

The aim of having several aliases for the same brands are to target certain geos and languages in best possible way, both with the content relevancy, payment methods and

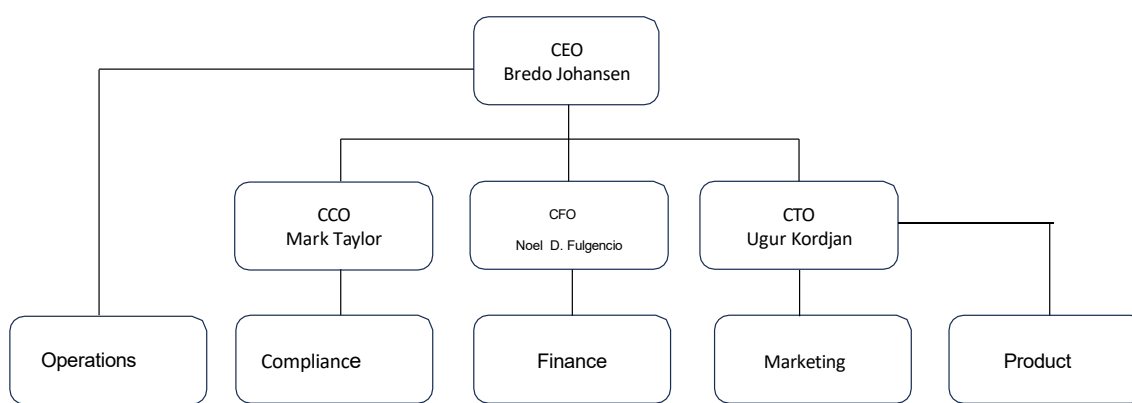
promotions. Westward Way Tech N.V. strives to implement latest technologies to IP to ensure best possible user experience at all times.

Company Management Structure, Key Management Roles & Reporting Lines.

The operational structure is a functional structure that consists of executive the management team and CEO/MD heading the structure as the leader and business strategy setter, they have direct reports from department directors and heads of departments across all functions.

Key Management Roles & Direct Reports To The CEO/MD.

Organizational Structure Westward Way Tech N.V.



There are 5 direct reports to the CEO Head of Operations, CFO / Financial Controller, CMO, Head of Marketing, CTO, Head of Tech, COP, Head of Product and CMO, Head of Commercial.

CCO Head of Compliance (or Compliance Manager) is reporting to the CFO, and AML officer/clerks report to the head of compliance. (As well as any other personnel who are required by the law, which falls under the compliance department).

CTO, Head of Marketing directly reports to the CEO and responsible from the marketing strategy and execution of the strategy. Under Head of Marketing, Acquisition and Retention/CRM Managers reports to the CTO directly and their respective operational teams reports to the respective managers underneath the CTO.

CEO, Head of Ops, is directly responsible from the operational teams. Operations split to two distinct teams as Support and Payments. Respective team managers directly report to the CMO and their teams report to the manager via team leader support/payments clerks hierarchy.

CTO directly reports to the CEO and responsible for the technical teams. Team's includes development team, and system admin team. Every subunit has their own leads, who are directly reporting to the CTO.

CTO, Head of Product and CCO Head of Compliance directly reports to the CEO. Casino, Sportsbook and Marketing Product managers and Commercial manager reports to Head of Product.

Key Suppliers and Material Dependencies

Westward Way Tech N.V. takes a strategic approach to mitigate business risk by diversifying its business across product and markets. Unlike traditional businesses that rely heavily on a single product, market, or payment method, Westward Way Tech N.V. expands its operations across multiple products, geographical locations, and payment methods.

It also partners with several vendors for the same product.

This diversification strategy aims to reduce the impact of downtime or service outages and give the customer more choice.

Game suppliers are acquired directly from the provider and indirectly from the game aggregators. This maintains the availability of the games almost to a maximum level.

Payment services providers are also well diversified, and more than one similar payment method is onboarded to also maintain the service levels and the availability.

Risk Evaluation & Management.

This important aspect of the business operation is covered under the various operational policy documentation:

- Data Protection and Privacy Policy for Westward Way Tech N.V.
- Diversity and Inclusion Policy for Westward Way Tech N.V.
- Operational Risk Management Policy for Westward Way Tech N.V.
- Vendor Management Policy for Westward Way Tech N.V.
- Product Development Policy for Westward Way Tech N.V.
- Financial Control Policy for Westward Way Tech N.V.
- Customer Service Policy for Westward Way Tech N.V.
- Anti-Money Laundering and Anti-Terror Financing Policy for Westward Way Tech N.V.

Each policy is covered in detail later in this document.

Data Protection and Privacy Policy for Westward Way Tech N.V.

Purpose

The Data Protection and Privacy Policy of Westward Way Tech N.V. underlines our commitment to safeguarding the personal and sensitive information of our customers, employees, and partners. In an era where data breaches can significantly impact trust and operational integrity, our policy ensures compliance with global data protection regulations such as the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA), among others.

Scope

This policy applies to all employees, contractors, and third parties who have access to data controlled or processed by Westward Way Tech N.V., across all platforms, locations, and operations.

Policy Statement

Westward Way Tech N.V. is dedicated to:

- Ensuring the privacy and security of all data collected and processed.
- Complying with applicable data protection laws and standards.
- Implementing comprehensive data security measures.
- Facilitating transparency and access rights for individuals regarding their personal data.

Data Protection Principles

Westward Way Tech N.V. adheres to the following principles:

1. **Lawfulness, Fairness, and Transparency:** Data is processed lawfully, fairly, and in a transparent manner.
2. **Purpose Limitation:** Data is collected for specified, explicit, and legitimate purposes and not further processed in a manner incompatible with those purposes.
3. **Data Minimization:** Only data that is necessary for the purposes for which it is processed is collected.
4. **Accuracy:** Reasonable steps are taken to ensure that personal data is accurate and, where necessary, kept up to date.
5. **Storage Limitation:** Data is kept in a form that permits identification of data subjects for no longer than is necessary.
6. **Integrity and Confidentiality:** Data is processed in a manner that ensures appropriate security, including protection against unauthorized or unlawful processing, accidental loss, destruction, or damage.

Data Subject Rights

Individuals have the right to:

- Be informed about the collection and use of their personal data.
- Access their personal data.
- Rectify inaccurate personal data.
- Erase personal data ("right to be forgotten").
- Restrict processing under certain conditions.
- Data portability.
- Object to processing.

Responsibilities

- **Data Protection Officer (DPO):** Appointed to oversee compliance with this policy, acting as a point of contact for data protection authorities.
- **Employees:** Required to understand and comply with this policy, ensuring that personal data is handled in accordance with the data protection principles.

- **IT Department:** Implements and maintains technical and organizational measures to protect data security, including encryption, access controls, and regular cybersecurity assessments.

Data Breach Response

In the event of a data breach, Westward Way Tech N.V. will:

- Promptly evaluate the risk to individuals' rights and freedoms.
- Report significant breaches to the relevant supervisory authority within 72 hours, where feasible.
- Inform affected individuals without undue delay if the breach poses a high risk to their rights and freedoms.

Training and Awareness

All employees will receive training on the importance of data protection and the specifics of this policy. Regular updates and refreshers will be provided to ensure ongoing compliance and awareness.

Review and Updates

This policy will be reviewed annually or in response to significant regulatory or operational changes. Any amendments will be communicated to all stakeholders.

Diversity and Inclusion Policy for Westward Way Tech N.V

Purpose

Westward Way Tech N.V. Diversity and Inclusion Policy underscores our commitment to creating an inclusive environment that respects and values diversity across all aspects of our business operations. We believe that a diverse workforce enhances creativity, innovation, and decision-making, leading to better products and services for our customers. This policy aims to promote equality, reduce workplace bias, and ensure all employees have the opportunity to reach their full potential.

Scope

This policy applies to all employees, contractors, management, and board members of Westward Way Tech N.V., encompassing all aspects of employment, including hiring, training, promotions, pay, and termination.

Policy Statement

Westward Way Tech N.V. is dedicated to:

- Fostering a workplace where diverse perspectives and experiences are welcomed and respected.
- Ensuring all employees have equal access to opportunities and resources.
- Promoting an inclusive culture that encourages collaboration and innovation.

Principles of Diversity and Inclusion

1. **Equal Opportunity:** Westward Way Tech N.V. is an equal opportunity employer. We do not discriminate based on race, colour, religion, gender, gender identity or expression, sexual orientation, national origin, genetics, disability, age, or any other status protected under applicable law.
2. **Respectful Workplace:** We commit to maintaining a workplace where everyone is treated with respect and dignity. Harassment, discrimination, and intolerance are strictly prohibited.
3. **Inclusive Leadership:** Our leaders play a crucial role in fostering an inclusive environment. They are responsible for setting the tone, demonstrating inclusive behaviours, and ensuring policies and practices support diversity and inclusion.

Strategies for Implementation

- **Recruitment and Hiring:** Implement unbiased recruitment processes to attract a diverse pool of candidates. This includes using inclusive language in job descriptions and ensuring diverse interview panels.
- **Training and Development:** Offer diversity and inclusion training for all employees, focusing on unconscious bias, cultural competence, and inclusive leadership skills.
- **Promotion and Advancement:** Ensure fair and transparent processes for promotions and career advancement, with a focus on merit and potential.
- **Employee Resource Groups (ERGs):** Support the formation and activities of ERGs, which provide networking, support, and advocacy for various employee groups.
- **Supplier Diversity:** Commit to diversity in our supply chain by working with minority-owned, women-owned, and other underrepresented businesses.

Responsibilities

- **Human Resources (HR):** HR is responsible for implementing and monitoring this policy, providing training, and supporting ERGs.
- **Managers:** Managers are expected to support diversity and inclusion initiatives, model inclusive behaviours, and address any issues of discrimination or harassment.
- **Employees:** All employees are encouraged to participate in diversity and inclusion initiatives and to contribute to an inclusive workplace culture.

Complaints and Grievances

Westward Way Tech N.V. has established procedures for employees to report discrimination, harassment, or any other breaches of this policy. Complaints will be treated with confidentiality and investigated promptly, with appropriate actions taken.

Monitoring and Review

This policy will be regularly reviewed and updated to ensure it reflects our commitment to diversity and inclusion. The effectiveness of diversity and inclusion initiatives will be monitored through employee feedback, surveys, and HR metrics.

Conclusion

At Westward Way Tech, we believe our strength lies in our diversity. This policy represents our ongoing commitment to creating a workplace where everyone can thrive and contribute to our collective success.

Operational Risk Management Policy for Westward Way Tech N.V.

Purpose

Westward Way Tech's Operational Risk Management Policy establishes the framework for identifying, assessing, mitigating, and monitoring operational risks that could potentially impact the company's performance, reputation, and financial stability. Our commitment is to proactively manage these risks to support our strategic objectives and ensure sustainable business growth.

Scope

This policy applies to all levels of the organization, including employees, management, and the board of directors, across all departments and geographical locations where Westward Way Tech N.V. operates.

Policy Statement

Westward Way Tech N.V. recognizes that operational risks are inherent in every aspect of our business activities. We are committed to managing these risks through a structured and disciplined approach, integrating risk management into our corporate culture and decision-making processes.

Operational Risk Management Principles

1. **Comprehensive Risk Identification:** We systematically identify risks associated with our business processes, technology systems, human factors, and external events.
2. **Consistent Risk Assessment:** Risks are assessed in terms of likelihood and impact, using qualitative and quantitative methods to prioritize risk management efforts.
3. **Effective Risk Mitigation:** We develop and implement strategies to mitigate identified risks, including process improvements, controls enhancement, and contingency planning.
4. **Continuous Monitoring and Reporting:** Ongoing monitoring of the risk environment and the effectiveness of mitigation measures is essential. Regular reports are provided to senior management and the board.

Roles and Responsibilities

- **Board of Directors:** Provides oversight and sets the tone for risk management culture across the company.
- **Risk Management Committee:** Oversees the implementation of the Operational Risk Management Policy, reviews risk assessments, and advises on risk mitigation strategies.
- **Chief Risk Officer (CRO):** Leads the risk management function, ensuring the effective identification, assessment, mitigation, and monitoring of operational risks.
- **Department Heads:** Responsible for managing risks within their areas of operation, implementing risk mitigation measures, and reporting on risk issues.
- **All Employees:** Required to understand the operational risks related to their activities and comply with risk management policies and procedures.

Risk Mitigation Strategies

- **Internal Controls:** Implementation of robust internal controls to prevent and detect risks.
- **Training and Awareness:** Regular training programs for employees to promote risk awareness and understanding of risk management practices.
- **Technology Use:** Leveraging technology to enhance risk detection and mitigation capabilities.
- **Business Continuity Planning:** Developing and maintaining business continuity plans to ensure the resilience of operations in the event of disruptions.

Incident Management and Response

- A structured process is in place for managing operational risk incidents, including immediate response, investigation, and remediation.
- Significant incidents are escalated to senior management and the board as appropriate.

Review and Improvement

- The Operational Risk Management Policy and related practices are reviewed annually or following significant changes in the business or external environment.
- Feedback from audits, incidents, and risk assessments informs continuous improvement of the risk management framework.

Conclusion

Through this policy, Westward Way Tech N.V. commits to a disciplined approach to operational risk management, aimed at protecting the company's assets, reputation, and stakeholder interests, while supporting strategic objectives and business resilience.

Vendor Management Policy for Westward Way Tech N.V.

Purpose

The Vendor Management Policy of Westward Way Tech N.V outlines our approach to managing and overseeing the relationships with our vendors, suppliers, and third-party service providers. This policy aims to ensure that these relationships support Westward Way Tech N.V. strategic objectives, operational requirements, and risk management practices, delivering value and maintaining high standards of quality and reliability.

Scope

This policy applies to all employees of Westward Way Tech N.V who are involved in the selection, contracting, management, and evaluation of vendors, across all departments and geographic locations.

Policy Statement

Westward Way Tech N.V is committed to establishing and maintaining effective, transparent, and mutually beneficial relationships with our vendors. We strive to ensure that our vendors adhere to the highest standards of quality, ethics, and compliance with relevant laws and regulations.

Vendor Selection and Onboarding

1. **Due Diligence:** Conduct thorough due diligence on potential vendors to assess their financial stability, reputation, quality of products/services, and compliance with legal and regulatory requirements.
2. **Selection Criteria:** Establish clear criteria for vendor selection, including quality of product/service, cost-effectiveness, reliability, and alignment with Westward Way Tech N.V. values and operational needs.
3. **Contracts and Agreements:** Ensure that contracts and agreements with vendors are clear, legally binding, and specify expectations, deliverables, performance metrics, compliance requirements, and terms for termination.

Vendor Performance Management

1. **Performance Monitoring:** Regularly review and monitor vendor performance against agreed-upon metrics and standards. This includes quality of products/services, delivery timelines, and responsiveness.
2. **Feedback and Communication:** Maintain open lines of communication with vendors, providing feedback on performance and working collaboratively to address any issues or areas for improvement.
3. **Performance Reviews:** Conduct formal performance reviews with vendors at agreed intervals to discuss performance, opportunities for improvement, and future plans.

Risk Management

1. **Risk Assessment:** Assess and categorize vendors based on the potential risk they pose to Westward Way Tech N.V. operations, including financial, operational, reputational, and compliance risks.
2. **Mitigation Strategies:** Develop and implement risk mitigation strategies for high-risk vendors, which may include increased monitoring, contingency planning, or diversification of vendors.
3. **Compliance Monitoring:** Regularly verify that vendors comply with applicable laws, regulations, and Westward Way Tech N.V. policies, including data protection, privacy, and security requirements.

Vendor Development and Relationship Management

1. **Strategic Partnerships:** Identify opportunities for developing strategic partnerships with key vendors that can offer competitive advantage, innovation, and added value to Westward Way Tech N.V.
2. **Vendor Development:** Support the development of vendors through training, sharing of best practices, and collaborative initiatives to improve product/service quality and efficiency.
3. **Dispute Resolution:** Establish clear procedures for resolving disputes with vendors, ensuring timely and fair resolution of issues.

Policy Review and Improvement

- This policy will be reviewed annually or more frequently if significant changes occur in Westward Way Tech N.V. operational environment or in the regulatory landscape.
- Feedback from stakeholders, lessons learned from vendor interactions, and changes in business strategy will inform updates and improvements to the policy.

Conclusion

Through the Vendor Management Policy, Westward Way Tech N.V. ensures that our relationships with vendors are managed effectively, supporting our operational goals, mitigating risks, and contributing to our long-term success. This policy is central to maintaining high standards of quality, reliability, and ethics in our dealings with external partners.

Product Development Policy for Westward Way Tech N.V.

Purpose

The Product Development Policy of Westward Way Tech N.V. outlines our approach to creating, developing, and launching new products. This policy ensures that our product development efforts align with our strategic goals, meet market needs, and adhere to the highest standards of quality and innovation.

Scope

This policy applies to all employees involved in the product development process, from concept generation to product launch, across all departments and units within Westward Way Tech N.V.

Policy Statement

Westward Way Tech N.V is committed to driving growth and achieving market leadership through the development of innovative products that meet the evolving needs of our customers. Our product development process is designed to be agile, customer-focused, and aligned with our strategic objectives, ensuring the delivery of competitive and high-quality products.

Product Development Principles

1. **Innovation and Creativity:** Encourage a culture of innovation and creativity, where new ideas are valued and explored.
2. **Customer Focus:** Ensure that customer needs and feedback are central to the product development process.
3. **Quality Assurance:** Maintain the highest standards of quality throughout the product development lifecycle.
4. **Strategic Alignment:** Align product development initiatives with the company's overall strategic goals and market opportunities.
5. **Risk Management:** Identify and mitigate risks associated with product development, including technical, market, and regulatory risks.

Roles and Responsibilities

- **Product Development Team:** Leads the development of new products, from ideation to launch, ensuring that projects are completed on time, within budget, and meet specified quality standards.
- **Research and Development (R&D):** Conducts market research and feasibility studies to validate product concepts and designs.
- **Marketing and Sales:** Provides market insights, customer feedback, and sales forecasts to shape product development efforts.
- **Quality Assurance (QA):** Ensures that all products meet required quality standards and compliance requirements.
- **Senior Management:** Provides oversight, resources, and strategic direction for product development activities.

Product Development Process

1. **Idea Generation:** Collect and evaluate new product ideas from various sources, including customers, market research, and internal teams.
2. **Feasibility Study:** Assess the technical feasibility, market potential, and financial viability of proposed product ideas.
3. **Design and Development:** Develop product prototypes, conduct testing, and refine product designs based on feedback.

4. **Market Testing:** Test the product in select markets or with specific customer groups to gather insights and make necessary adjustments.
5. **Launch:** Plan and execute the product launch, including marketing strategies, distribution channels, and sales training.
6. **Post-Launch Review:** Evaluate the product's performance in the market, gather customer feedback, and identify areas for improvement.

Quality and Compliance

- Ensure that all products comply with industry standards, regulatory requirements, and ethical guidelines.
- Implement quality control checks at each stage of the product development process.

Review and Improvement

- Regularly review and update the Product Development Policy to reflect changes in the market, technology, and strategic direction.
- Incorporate lessons learned from each product development project to improve processes and outcomes.

Conclusion

Westward Way Tech N.V. Product Development Policy is designed to foster a structured yet flexible approach to developing innovative products. By adhering to this policy, we aim to deliver products that not only meet but exceed customer expectations, thereby securing our position as a leader in the market.

Financial Control Policy for Westward Way Tech N.V.

Purpose

Westward Way Tech N.V. Financial Control Policy establishes a framework for managing the company's financial resources responsibly and effectively. It aims to ensure accuracy in financial reporting, safeguard assets, and comply with all relevant financial regulations and standards.

Scope

This policy applies to all employees of Westward Way Tech N.V. who are involved in financial operations, including accounting, budgeting, financial reporting, and asset management, across all departments and levels of the organization.

Policy Statement

Westward Way Tech N.V. is committed to maintaining the highest standards of financial integrity and transparency. Our Financial Control Policy is designed to provide clear guidelines for financial management practices, ensuring that all financial transactions are conducted accurately, ethically, and in compliance with applicable laws and accounting standards.

Financial Management Principles

1. **Accuracy and Integrity:** Ensure that all financial transactions are recorded accurately and in a timely manner, reflecting the true nature of the transaction.
2. **Compliance:** Adhere to all applicable financial regulations, standards, and internal policies.
3. **Risk Management:** Identify, assess, and mitigate financial risks, including fraud, errors, and financial misreporting.
4. **Transparency:** Maintain open and transparent financial reporting, providing stakeholders with a clear and accurate view of the company's financial position.
5. **Accountability:** Hold individuals accountable for their financial management responsibilities, ensuring proper authorization and documentation of transactions.

Roles and Responsibilities

- **Chief Financial Officer (CFO):** Oversees the financial operations of the company, ensuring compliance with financial policies and regulations.
- **Accounting Department:** Responsible for accurate record-keeping, financial reporting, and ensuring that financial transactions comply with internal controls.
- **Budget Managers:** Manage departmental budgets, ensuring that expenditures are within approved limits and aligned with company objectives.
- **Internal Audit:** Conducts regular audits to assess the effectiveness of financial controls and compliance with policies.
- **All Employees:** Required to comply with the Financial Control Policy in their respective roles and responsibilities.

Key Financial Controls

1. **Budgeting and Forecasting:** Establish and maintain a rigorous budgeting and forecasting process to guide financial planning and decision-making.
2. **Expenditure Control:** Implement controls to ensure that all expenditures are authorized, necessary, and within budget.
3. **Revenue Management:** Ensure accurate recording and management of revenue, including timely invoicing and collection processes.
4. **Asset Management:** Maintain controls over the company's assets to prevent loss, theft, or misuse.
5. **Financial Reporting:** Prepare and review financial reports regularly, ensuring they are accurate, complete, and in compliance with accounting standards.

Compliance and Reporting

- Ensure compliance with financial laws, regulations, and standards, including tax reporting and payment obligations.
- Regular financial audits and reviews by internal and/or external auditors.

Training and Awareness

- Provide ongoing training to relevant employees on financial policies, procedures, and best practices.
- Promote a culture of financial responsibility and awareness throughout the organization.

Review and Updates

- The Financial Control Policy will be reviewed annually or as needed to reflect changes in financial regulations, standards, or company operations.
- Updates to the policy will be communicated to all affected employees.

Conclusion

The Financial Control Policy is integral to Westward Way Tech N.V. commitment to financial responsibility and transparency. By adhering to these guidelines, we aim to protect our assets, ensure accurate financial reporting, and maintain the trust of our stakeholders.

Customer Service Policy for Westward Way Tech N.V.

Purpose

Westward Way Tech N.V Customer Service Policy is designed to ensure the delivery of high-quality, consistent customer service that exceeds customer expectations and builds long-term relationships. This policy guides our interactions with customers, ensuring responsiveness, professionalism, and satisfaction across all touchpoints.

Scope

This policy applies to all employees and departments of Westward Way Tech N.V that engage with customers, including sales, support, technical service, and any third-party representatives acting on behalf of the company.

Policy Statement

Westward Way Tech N.V. is committed to providing exceptional customer service as a cornerstone of our business. We believe that outstanding customer service not only enhances customer satisfaction but also fosters loyalty, promotes brand advocacy, and supports business growth. Our approach is customer-centric, aiming to provide timely, accurate, and empathetic support to all our customers.

Customer Service Principles

1. **Customer-Centricity**: Putting the customer at the centre of all we do, understanding their needs, and striving to meet or exceed their expectations.
2. **Responsiveness**: Ensuring timely responses to customer inquiries, feedback, or complaints across all channels.
3. **Transparency**: Providing clear, accurate, and honest information about our products, services, and policies.

4. **Professionalism:** Maintaining a professional demeanour in all customer interactions, demonstrating respect, courtesy, and understanding.
5. **Continuous Improvement:** Regularly seeking feedback from customers to improve our services and address any areas of dissatisfaction.

Roles and Responsibilities

- **Customer Service Team:** Serves as the first point of contact for customer inquiries, providing support, resolving issues, and enhancing customer satisfaction.
- **Management:** Ensures the customer service team is properly trained, resourced, and motivated to deliver exceptional service. Monitors customer service performance against KPIs and implements improvements.
- **All Employees:** Understand and support the importance of excellent customer service, contributing positively to customer experiences as appropriate.

Customer Service Standards

- **Response Times:** Set clear expectations for response times across different channels (e.g., email, phone, chat) and strive to meet or exceed these standards.
- **Resolution Times:** Aim to resolve customer issues promptly, setting realistic timelines for more complex issues and keeping customers informed of progress.
- **Feedback Mechanisms:** Provide customers with easy methods to provide feedback, and ensure this feedback is regularly reviewed and acted upon.
- **Training and Development:** Regularly train customer service staff on product knowledge, communication skills, and problem-solving techniques to enhance service quality.

Handling Complaints and Escalations

- Implement a clear process for handling customer complaints, ensuring issues are escalated appropriately and resolved to the customer's satisfaction.
- Analyse complaint patterns to identify underlying issues and implement systemic changes to prevent recurrence.

Review and Monitoring

- Regularly review customer service interactions and performance against set KPIs, such as customer satisfaction scores, resolution times, and feedback ratings.
- Conduct periodic audits of customer service practices and procedures to ensure compliance with this policy and identify areas for improvement.

Conclusion

At Westward Way Tech N.V., we view every customer interaction as an opportunity to reinforce our commitment to quality and service excellence. Our Customer Service Policy embodies this commitment, guiding our efforts to deliver service that not only

meets but exceeds customer expectations, fostering loyalty and driving business success.

Anti-Money Laundering and Anti-Terror Financing Policy for Westward Way Tech N.V.

Purpose

Westward Way Tech N.V. Anti-Money Laundering (AML) and Anti-Terror Financing Policy demonstrate our commitment to preventing, detecting, and reporting activities that may facilitate money laundering or the financing of terrorism. This policy aligns with global regulatory standards and best practices, ensuring our operations uphold integrity and comply with applicable laws and regulations.

Scope

This policy applies to all employees, contractors, and business partners of Westward Way Tech N.V, across all operations and jurisdictions where we conduct business.

Policy Statement

Westward Way Tech N.V. strictly prohibits any activities related to money laundering or terrorism financing. We are dedicated to maintaining a robust compliance program that includes customer due diligence, ongoing monitoring, and the reporting of suspicious activities to relevant authorities. Our efforts are designed to protect the company, its customers, and the financial system from abuse.

Principles

1. **Compliance with Laws and Regulations:** Adhere to all applicable AML and anti-terror financing laws and regulations within the jurisdictions we operate.
2. **Customer Due Diligence (CDD):** Implement thorough customer identification, verification processes, and risk assessment to understand and mitigate potential risks.
3. **Ongoing Monitoring:** Regularly monitor transactions and customer relationships for unusual or suspicious activity.
4. **Reporting:** Promptly report suspicious activities to the appropriate regulatory bodies without notifying the customer involved in the suspicious activity.
5. **Employee Training:** Provide regular AML and anti-terror financing training to all relevant employees to ensure they are aware of the risks and their responsibilities under this policy.
6. **Record Keeping:** Maintain comprehensive records of customer identification information, transaction data, and compliance efforts for a period as mandated by applicable laws.

Roles and Responsibilities

- **Board of Directors:** Approves and supports the AML and anti-terror financing policy.
- **Compliance Officer:** Oversees the AML program, including policy implementation, monitoring compliance, and reporting suspicious activities.

- **Employees:** Responsible for adhering to the policy, completing required training, and reporting suspicious activities to the Compliance Officer.
- **Internal Audit:** Regularly reviews the effectiveness of the AML compliance program and suggests improvements.

Customer Due Diligence and Enhanced Due Diligence

- Conduct CDD measures for all new customers before establishing a business relationship.
- Perform Enhanced Due Diligence (EDD) for higher-risk customers, including politically exposed persons (PEPs) and those from high-risk countries.

Transaction Monitoring and Reporting

- Implement systems and procedures for monitoring customer transactions for signs of money laundering or terrorism financing.
- Report any transactions that are suspected of being related to money laundering or terrorism financing to the relevant authorities as required by law.

Employee Training and Awareness

- Provide comprehensive training on AML and anti-terror financing laws, identification of suspicious activities, and reporting procedures.
- Regular training sessions to ensure employees remain aware of emerging risks and compliance requirements.

Review and Update

- Regularly review and update the AML and anti-terror financing policy to reflect changes in laws, regulations, and best practices.
- Conduct an annual audit of the AML program to assess its effectiveness and make necessary adjustments.

Conclusion

Westward Way Tech N.V. AML and Anti-Terror Financing Policy underscores our unwavering dedication to legal compliance and ethical business conduct. By rigorously implementing this policy, we aim to prevent our operations from being misused for money laundering or terrorism financing, thereby contributing to global financial security and integrity.

ANNEX 1

3 Year Forecast

	2024 Total	2025 Total	2026 Total
Net Gaming Revenue (NGR)	3759264	22574361	60192102
Marketing Cost	575313	1968161	4805079
Affiliate Revshare	341373	1265930	3035527
Provider Revshare	862332	6376837	18057631
PSP Fees	579018	4251225	12038420
Distribution Costs	2358036	13862153	37936657
Gross Profit / (Loss)	1401228	8712208	22255444
Office Rent and Expenses	60000	120000	150000
Payroll	1040795	2403968	2823968
IT Costs	12000	30000	18000
Licensing and Legal Administration	16000	50000	50000
Travel	20000	48000	60000
Administrative costs	1148795	2651968	3101968
Net Profit/ (Loss)	252433	6060240	19153476

2024

	Jan-24	Feb-24	Mar-24	Apr-24	May-24	Jun-24	Jul-24	Aug-24	Sep-24	Oct-24	Nov-24	Dec-24	Totals
Totals													
Actives - Daily					1650	1875	2100	2400	2640	3000	3300	3600	
Actives - Retained					660	750	840	960	1056	1200	1320	1440	
Actives - New					990	1125	1260	1440	1584	1800	1980	2160	
Deposit					412869	495442	594531	713437	856124	1027349	1232819	1479383	
Withdrawal					227078	272493	326992	392390	470868	565042	678050	813661	
GGR					309651	421126	505351	606421	727706	873247	1047896	1257475	
NGR					154827	252675	303210	394173	473010	567609	733527	880233	3759264
PSP Fees					35094	42114	50535	60642	72771	87324	104790	125748	579018
IP Provider Revshare					46449	63168	75804	90963	109155	130986	157185	188622	862332
Marketing Cost					58260	58260	58260	72825	72825	72825	91029	91029	575313
Affiliate Rev					46449	75804	90963	98544	118251	141903	183381	220059	
Affiliate Revshare					16257	26532	31836	34491	41388	49665	64185	77019	341373
Licensing and Legal Administration					2000	2000	2000	2000	2000	2000	2000	2000	16000
Travel					2500	2500	2500	2500	2500	2500	2500	2500	20000
IT Costs					1500	1500	1500	1500	1500	1500	1500	1500	12000
Office Rent and Expenses					7500	7500	7500	7500	7500	7500	7500	7500	60000
Payroll					130099	130099	130099	130099	130099	130099	130099	130099	1040795
Profit and Loss					-144832	-80998	-56824	-8347	33272	83210	172739	254216	PnL Total 252433

2025

	Jan-25	Feb-25	Mar-25	Apr-25	May-25	Jun-25	Jul-25	Aug-25	Sep-25	Oct-25	Nov-25	Dec-25		
Actives - Daily	3750	4500	4800	5250	5513	6064	6519	7170	7708	8479	9327	10260		
Actives - Retained	1500	1800	1920	2100	2205	2426	2607	2868	3083	3392	3731	4104		
Actives - New	2250	2700	2880	3150	3308	3638	3911	4302	4625	5087	5596	6156		
Deposit	2130311	2556373	3067648	3221030	3543133	3808869	4189755	4503987	4954386	5449824	5994807	6594287		
Withdrawal	1171671	1406005	1687206	1771567	1948723	2094878	2304365	2477193	2724912	2997403	3297144	3626858		
GGR	1810764	2172917	2607501	2737876	3011663	3237538	3561292	3828389	4211228	4632351	5095586	5605144		
NGR	1267535	1521042	1825251	1368938	1505832	1618769	1780646	1914194	2105614	2316175	2547793	2802572	22574361	
PSP Fees	181076	217292	260750	273788	301166	323754	356129	382839	421123	463235	509559	560514	4251225	
Provider Revshare	271615	325938	391125	410681	451750	485631	534194	574258	631684	694853	764338	840772	6376837	
Marketing Cost	113787	113787	113787	142234	142234	142234	177792	177792	177792	222240	222240	222240	1968161	
Affiliate Rev	253507	304208	365050	410681	451750	485631	445162	478549	526403	579044	636948	700643		
Affiliate Revshare	88727	106473	127768	82136	90350	97126	89032	95710	105281	115809	127390	140129	1265930	
Licensing and Legal Administration	50000	0	0	0	0	0	0	0	0	0	0	0	50000	
Travel	4000	4000	4000	4000	4000	4000	4000	4000	4000	4000	4000	4000	48000	
IT Costs	2500	2500	2500	2500	2500	2500	2500	2500	2500	2500	2500	2500	30000	
Office Rent and Expenses	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	10000	120000	
Payroll	200331	200331	200331	200331	200331	200331	200331	200331	200331	200331	200331	200331	2403968	
Profit and Loss	345499	540722	714990	243268	303501	353194	406668	466765	552903	603208	707436	822086	PnL Total 6060240	

2026

	Jan-26	Feb-26	Mar-26	Apr-26	May-26	Jun-26	Jul-26	Aug-26	Sep-26	Oct-26	Nov-26	Dec-26		
Actives - Daily	11286	12132	13345	14680	15047	15799	16391	17211	17856	18749	19687	20671		
Actives - Retained	4514	4853	5338	5872	6019	6320	6557	6884	7143	7500	7875	8268		
Actives - New	6771	7279	8007	8808	9028	9479	9835	10327	10714	11250	11812	12403		
Deposit	7088859	7797745	8577519	9006395	9907035	10650062	11715069	12593699	13853069	15238376	16762213	18438434		
Withdrawal	3898872	4288760	4717636	4953517	5448869	5857534	6443288	6926534	7619188	8381107	9219217	10141139		
GGR	6025530	6628083	7290891	7655436	8420980	9052553	9957808	10704644	11775108	12952619	14247881	15672669		
NGR	3012765	3314042	3645446	3827718	4210490	4526277	4978904	5352322	5887554	6476310	7123941	7836335	60192102	
PSP Fees	602553	662808	729089	765544	842098	905255	995781	1070464	1177511	1295262	1424788	1567267	12038420	
Provider Revshare	903830	994212	1093634	1148315	1263147	1357883	1493671	1605697	1766266	1942893	2137182	2350900	18057631	
Marketing Cost	277800	277800	277800	347251	347251	347251	434063	434063	434063	542579	542579	542579	4805079	
Affiliate Rev	602553	662808	729089	1148315	1263147	1357883	1244726	1338080	1471889	1619077	1780985	1959084		
Affiliate Revshare	120511	132562	145818	229663	252629	271577	248945	267616	294378	323815	356197	391817	3035527	
Licensing and Legal Administration	50000	0	0	0	0	0	0	0	0	0	0	0	50000	
Travel	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	5000	60000	
IT Costs	1500	1500	1500	1500	1500	1500	1500	1500	1500	1500	1500	1500	18000	
Office Rent and Expenses	12500	12500	12500	12500	12500	12500	12500	12500	12500	12500	12500	12500	150000	
Payroll	235331	235331	235331	235331	235331	235331	235331	235331	235331	235331	235331	235331	2823968	
Profit and Loss	803741	992328	1144774	1082615	1251034	1389980	1552113	1720151	1961006	2117430	2408864	2729441	PnL Total 19153476	