

OPERATIONS MANUAL

Promotech N.V.

Licensed and regulated by the Curaçao Gaming Authority

License No. OGL/2024/611/0233

<https://fortunica.casino>

Prepared in accordance with the National Ordinance on Games of Chance (LOK)

KYC (Know Your Customer) — the identity-verification process by which a Player provides a valid photo identity document, proof of address and, where relevant, payment and source-of-funds documentation before transacting.

LOK — the National Ordinance on Games of Chance of Curaçao (Landsverordening op de Kansspelen), under which this Operations Manual is prepared.

PEP (Politically Exposed Person) — a natural person who is, or has been, entrusted with a prominent public function, together with their family members and known close associates, who is subject to Enhanced Due Diligence.

Player / Customer / User — a natural person who uses the online gaming and betting services provided by the Company through the Website.

Responsible Gaming — the framework of measures, tools and communications applied by the Company to promote safe play and to protect Players from gambling-related harm, as set out in the Responsible Gaming Policy and summarised in this Manual.

RNG — Random Number Generator — the certified mechanism, maintained by the licensed game suppliers, by which the outcomes of virtual Games are determined.

RTP (Return-to-Player) — the theoretical long-term percentage of total stakes that a Game returns to Players, set per Game by the relevant provider and displayed within each Game's rules.

Sanctions — the financial and trade restrictions imposed by competent authorities against designated persons, entities or jurisdictions, against which Players are screened at onboarding and on an ongoing basis.

Self-Exclusion — a Player-requested or operator-initiated exclusion from play for 1, 3, 5 or 10 years or permanently (default one year), during which the Player cannot log in, deposit, play, withdraw or open a new account.

Source of Funds — evidence of the origin of the money a Player uses to gamble, which the Company may request for large deposits, unusual activity or higher-risk Players.

Tier-IV Data Centre — the highest-classification, fault-tolerant data-centre standard; the certified facility, registered in Curaçao, on whose servers the Company's critical records are held and kept available to the CGA at all times.

Website — the online platform operated by the Company at <https://fortunica.casino> through which the Games are made available to Players.

2. Scope of the Operations Manual

2.1. This Operations Manual (the "Manual") describes how Promotech N.V. ("the Company") conducts its licensed online gaming operation at <https://fortunica.casino>. It is prepared and maintained in accordance with the LOK and the Company's license conditions, and documents how the operation is organised and controlled.

- 2.2.** The Manual is reviewed and updated by the Company's Compliance Officer in line with changes in legislation, the Company's policies and its operational procedures.
- 2.3.** This Manual should be read together with the Company's underlying policies, in particular its AML/CFT and Sanctions Compliance Policy, Responsible Gaming Policy, Player Complaints Policy and Privacy Policy, which contain the detailed procedures supporting the summaries set out below.
- 2.4.** Responsibility for the operation described in this Manual is shared between the Director and the Compliance Officer, whose respective duties are set out below.

Director

- Holds overall accountability for the lawful conduct of the operation and approves the Company's policies and this Manual within the general framework established by the management.
- Reviews, at least annually, the effective implementation of the risk-based approach and the adequacy of the controls described in this Manual.
- Ensures that the compliance function is provided with adequate staffing and resources, and oversees the staff training program.
- Ensures that this Manual is made available for inspection by the CGA.

Compliance Officer

- Prepares, maintains and periodically reviews this Manual and the underlying policies, and ensures they remain consistent with the operation and with applicable regulation.
- Develops, implements and continuously monitors the procedures and controls based on the risk-based approach, and updates them as risks or regulatory requirements evolve.
- Oversees the correct application of customer due diligence (CDD and EDD), reviewing the relevant procedures at least annually, and is responsible for assigning customers to the appropriate risk category.
- Reviews screening and monitoring alerts, handles escalations, and decides on reclassification, enhanced monitoring, reporting or termination of a relationship; acts as the point of contact with the CGA.
- Prepares the annual compliance report and ensures that records are retained in accordance with the record-keeping requirements.
- Ensures that relevant staff complete responsible-gaming and AML/CFT training, and oversees the responsible-gaming and complaint-handling functions from the compliance side.

3. Games, payments and game outcomes

3.1. Games offered

The Company offers online casino games and sports betting through the Website. The services are delivered in a standardized manner, on a non-face-to-face basis, to a broad and similar customer base. The casino offering is organised into categories, which include:

- Slots, including classic, fruit, Megaways and Buy-Feature slots
- Live Casino (live-dealer games)
- Table games – Roulette, Blackjack, Baccarat and Poker
- Instant and crash games – e.g. Aviator, Crash, Mines and Plinko
- Bingo, Scratch and Fishing games
- Themed and curated collections (e.g. Popular, Latest, Top games)
- Sports betting (Sportsbook)

Many Games are available in a free Demo mode that can be played without depositing. The Company reserves the right to add or remove Games and providers from the Website at its own discretion.

3.2. Game providers

Games are supplied by integrated, licensed third-party providers, including Booongo, Slotopia, Endorphina, Gamzix, Swintt, Playson and Evoplay. Each provider supplies its own game software and is responsible for the certified operation of that software. The list of providers may change as integrations are added or removed.

3.3. Software and outcome-determining elements

Outcomes of virtual games are determined by certified Random Number Generators (RNGs); live-casino outcomes are determined by live dealers using physical gaming equipment under supervision. Game results are generated independently and cannot be influenced or manipulated by the Company or the Player. The records stored on the Company's server are authoritative: in the event of any discrepancy between a result or balance displayed on a Player's device and that stored on the server, the server record prevails. If a malfunction affects a Game, the bets placed during the affected period are treated as void; where a Game begins but fails to complete due to a technical error, the amount wagered is refunded or the equivalent value is credited to the Player's account.

3.4. Payment possibilities

Players fund their accounts and receive payouts through the payment methods made available in the cashier after login. Payments are managed by the Company's authorised payment agent, Rollixet LTD (a company registered in Cyprus, registration number HE 449682), which may use third-party payment processors and financial institutions. The Company does not accept cash payments.

Deposits must be made using payment methods registered in the Player's own name; third-party deposits and withdrawals are not permitted. By making a deposit, the Player confirms that the funds derive from legal sources; chargebacks or payment reversals may lead to permanent account closure. Withdrawals are generally processed back to the same method used to deposit. Before the first withdrawal, the Player

must complete identity verification (KYC) by providing a valid photo identity document, proof of address, a bank statement and, where a card was used, an image of the card showing only the permitted digits; additional documents may be required depending on the payment provider. The Company may request source-of-funds documentation for large deposits or unusual account activity. Supported currencies include EUR, AUD, CAD, NZD, PLN, NOK, BRL and DKK.

3.5. Bet amounts and payouts

Minimum and maximum stakes and payout structures (Return-to-Player) are set per individual Game by the relevant provider and are displayed within each Game and its rules screen.

The minimum withdrawal amount is EUR 20 (or the equivalent in the supported currencies). For verified Players, withdrawal processing times depend on the amount requested: smaller amounts are generally processed within hours; mid-range amounts within a few business days; and larger amounts within longer periods of up to several weeks, depending on the amount, as set out in the general terms and conditions. Standard per-user withdrawal limits apply by transaction, per day and per 30-day period. A Player must wager at least the value of the relevant deposit before a withdrawal is permitted, and a service fee may apply to withdrawals of funds that have not been used for betting. Identity verification is required before the first withdrawal and for larger withdrawals.

4. Game integrity and quality monitoring

- 4.1.** The Company is committed to ensuring that the Games offered through the Website operate fairly, reliably and as intended. Quality monitoring is applied on an ongoing basis rather than as a one-time exercise, and combines controls applied by the Company with controls applied by its game suppliers.
- 4.2.** The Company relies on certified Random Number Generators and gaming systems provided and maintained by its licensed game suppliers. As part of onboarding and on a recurring basis, the Company satisfies itself that the relevant supplier certifications are in place and remain valid for the Games made available on the Website.
- 4.3.** During operation, the Company monitors the availability, performance and integrity of the Games. This includes observing that Games launch and settle correctly, that results recorded on the server are consistent and complete, and that any interruptions, errors or atypical behaviour are identified and addressed. Where a malfunction is detected, affected rounds are handled in accordance with the Company's rules, and stakes are returned or balances corrected as appropriate.
- 4.4.** The outcome and balance records stored on the Company's server are treated as the authoritative source for the purposes of quality assurance and dispute resolution. The Company periodically reviews the effectiveness of these monitoring arrangements and updates them as its products, suppliers or regulatory requirements evolve.

5. Storing player data and records

- 5.1. The Company collects and stores Players' personal data and related details in order to operate the Website, verify Players, process transactions and comply with its legal and regulatory obligations.
- 5.2. The collection, use and protection of personal data are governed by the Company's Privacy Policy, published on the Website. The Company processes personal data in accordance with applicable data-protection legislation and only for the purposes described in that policy and in this Manual, including compliance with legal and regulatory obligations.
- 5.3. Records are retained in a secure and accessible format for a minimum period of five (5) years from the date of the last transaction or termination of the business relationship, whichever is later. Identification and verification documents, due-diligence and source-of-funds records, complete transaction records and records of risk assessments, alerts and investigations are maintained in the Player's file.
- 5.4. Stored data is protected by appropriate technical and organisational measures designed to preserve its confidentiality, integrity and availability. Access is restricted to authorised personnel on a need-to-know basis, and data is protected both in storage and in transmission. The critical records described in section 12 of this Manual are held on servers of a Tier-IV certified data centre registered in Curaçao and are kept available to the CGA at all times.

6. The player interface

Players interact with the operation through the Website at <https://fortunica.casino>, which runs in any modern web browser on desktop and mobile devices. The principal visual elements presented to Players are described below; the figures in this section reproduce the live production environment, and each figure is captioned with the element it shows.

6.1. Homepage

The homepage is the Player's entry point to the operation. It presents the top navigation bar (with the menu control, the Fortunica brand mark and a game search), the account actions (language selector, Login and Register), and the primary product switch between Casino and Sport together with the Promotions entry point. Below these, the homepage displays featured promotions and the welcome bonus and presents rows of trending, popular and latest Games. The footer carries the full operator and licensing information — including the Company's registration details, the CGA certification seal and license number, and the authorised payment agent — alongside links to all legal documents and the responsible-gaming marks (18+, GamCare, GambleAware) and a play-responsibly message. The figures below reproduce these elements in the order in which a Player encounters them.



Figure 1 — Homepage: top navigation bar — menu control, Fortunica brand mark and game search.



Figure 2 — Homepage: account actions — language selector, Login and Register.



Figure 3 — Homepage: Casino / Sport product switch and Promotions entry point.

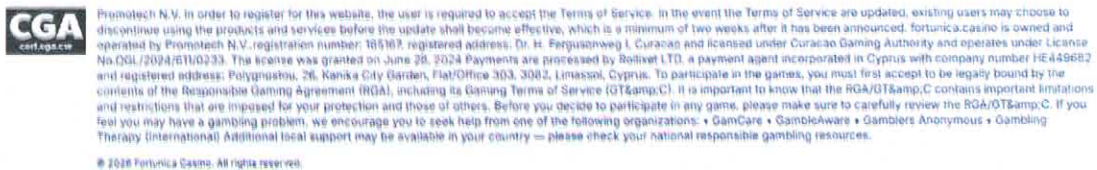


Figure 4 — Homepage footer: operator, licensing and payment-agent information with the CGA certification seal.



Figure 5 — Homepage footer: responsible-gaming marks (18+, GamCare, GambleAware) and play-responsibly message.

6.2. Game lobby and categories

The game lobby is the central area from which Players browse and select Games. A persistent left-hand navigation panel lists the main categories — Popular, Slots, Live Casino, Table games (Roulette, Blackjack, Baccarat, Poker), instant and crash games (Crash, Mines, Plinko), Bingo, Scratch and Fishing — together with a Providers entry that lets the Player filter the catalogue by supplier. Categories that contain sub-types expand to reveal them, so that a Player can move from a broad category to a specific group of Games in a single step. The same navigation also exposes the Promotions area and the switch between the Casino and Sportsbook products.

Within each category, Games are displayed as a responsive grid of tiles. Every tile carries the Game's artwork and title and the mark of the licensed provider that supplies it, and on selection presents a Play action for real-money play and, where the provider supports it, a Demo action for free play. A search field at the top of the lobby allows the Player to find a specific Game or provider by name, and curated rows such as Popular, Latest and Top games surface recommended and recently added titles. The lobby loads

additional Games progressively as the Player scrolls, and the responsible-gaming marks and links to the legal documents always remain accessible from the surrounding interface.



Figure 6 — Game lobby: the “All games” view with category navigation and provider-branded game tiles.

6.3. In-game screen

When a Player launches a Game, it opens in a dedicated in-game view. The Game itself occupies the main area of the screen, while a surrounding frame provides the controls and information the Player needs to play responsibly and with full visibility of the rules. A breadcrumb at the top identifies the Game and the category it belongs to, the current account balance and its currency are displayed prominently, and a clear control allows the Player to switch between real-money play (“Play for Real”) and free Demo mode, or to close the Game and return to the lobby. When Demo mode is active it is clearly indicated, so that the Player is never in doubt as to whether real funds are at stake.

The stake controls let the Player set or adjust the bet amount within the minimum and maximum limits configured for that Game by the provider, and, where the Game supports them, to use features such as repeated or automatic rounds. The Game rules and the Return-to-Player information are accessible directly from the in-game view, and live games may additionally show round history, recent results and other players’ activity, as illustrated below. All outcomes are produced by the provider’s certified Random Number Generator or, for live games, by a live dealer under supervision, and are recorded on the Company’s server, which remains the authoritative record of the result and the resulting balance. If a Game malfunctions or fails to complete due to a technical error, the affected round is handled in accordance with the Company’s rules — the bet is voided and the stake returned, or the equivalent value is credited to the Player’s account — as described in section 3.3.

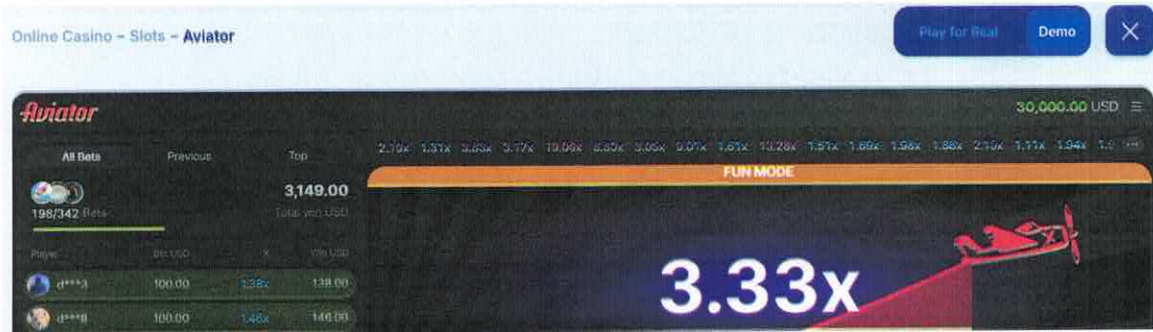


Figure 7 — In-game view (Aviator): live game with stake controls, balance and the Play for Real / Demo toggle.

6.4. Player account and responsible-gaming controls

After login, the Player can access the account area, the cashier (deposit and withdrawal, including the KYC verification flow) and the responsible-gaming controls. The responsible-gaming controls are grouped in the “Responsible Gambling” section and give the Player direct, self-service access to the tools used to keep play within chosen boundaries: an activity (session-time) limit, deposit and loss limits, a wager limit, and a “Take a break” (cooling-off) option. For each tool the Player can set an amount or period, review the history of limits and see the limits currently active; reductions take effect immediately, while increases are subject to the applicable cooling-off period. The figures below show these controls as presented to the Player.

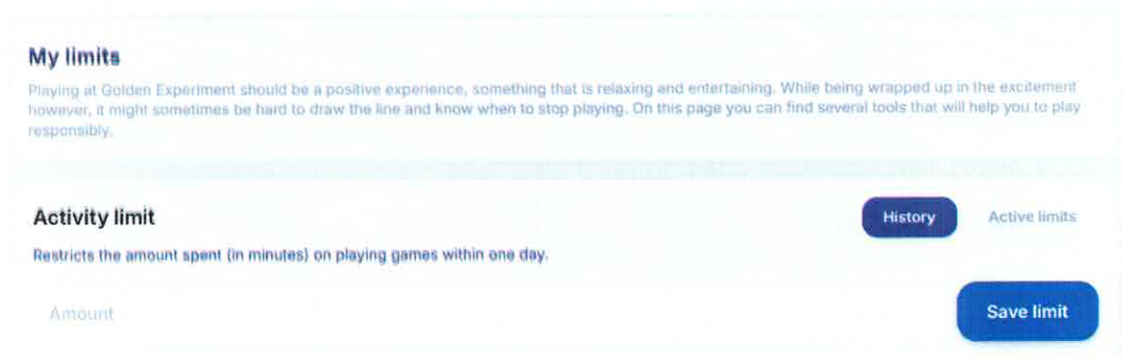


Figure 8 — Responsible Gambling: “My limits” overview and the Activity (session-time) limit.

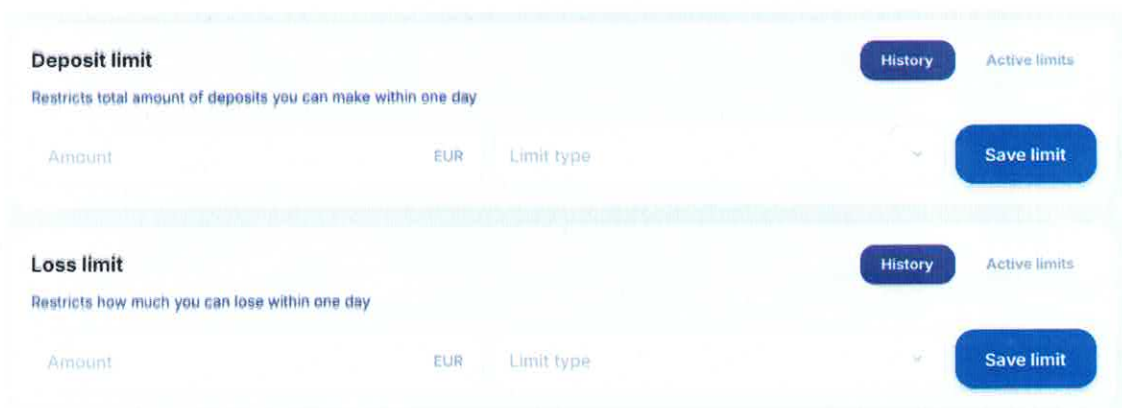


Figure 9 — Responsible Gambling: Deposit limit and Loss limit controls.

The screenshot displays two sections of a responsible gambling interface. The top section, titled 'Wager limit', includes a sub-header 'Restricts how much you can bet within one day'. It features a 'History' button, a 'Active limits' link, and a 'Save limit' button. Below these are input fields for 'Amount' (with a currency selector set to 'EUR') and 'Limit type'. The bottom section, titled 'Take a break', includes a sub-header 'Excludes you from playing for a desired number of days'. It also has a 'History' button, a 'Save limit' button, and a 'Limit type' dropdown menu. A note at the bottom of this section states: 'Once you set a limit you'll be unable to remove/increase it for 1 day'.

Figure 10 — Responsible Gambling: Wager limit and “Take a break” (cooling-off) controls.

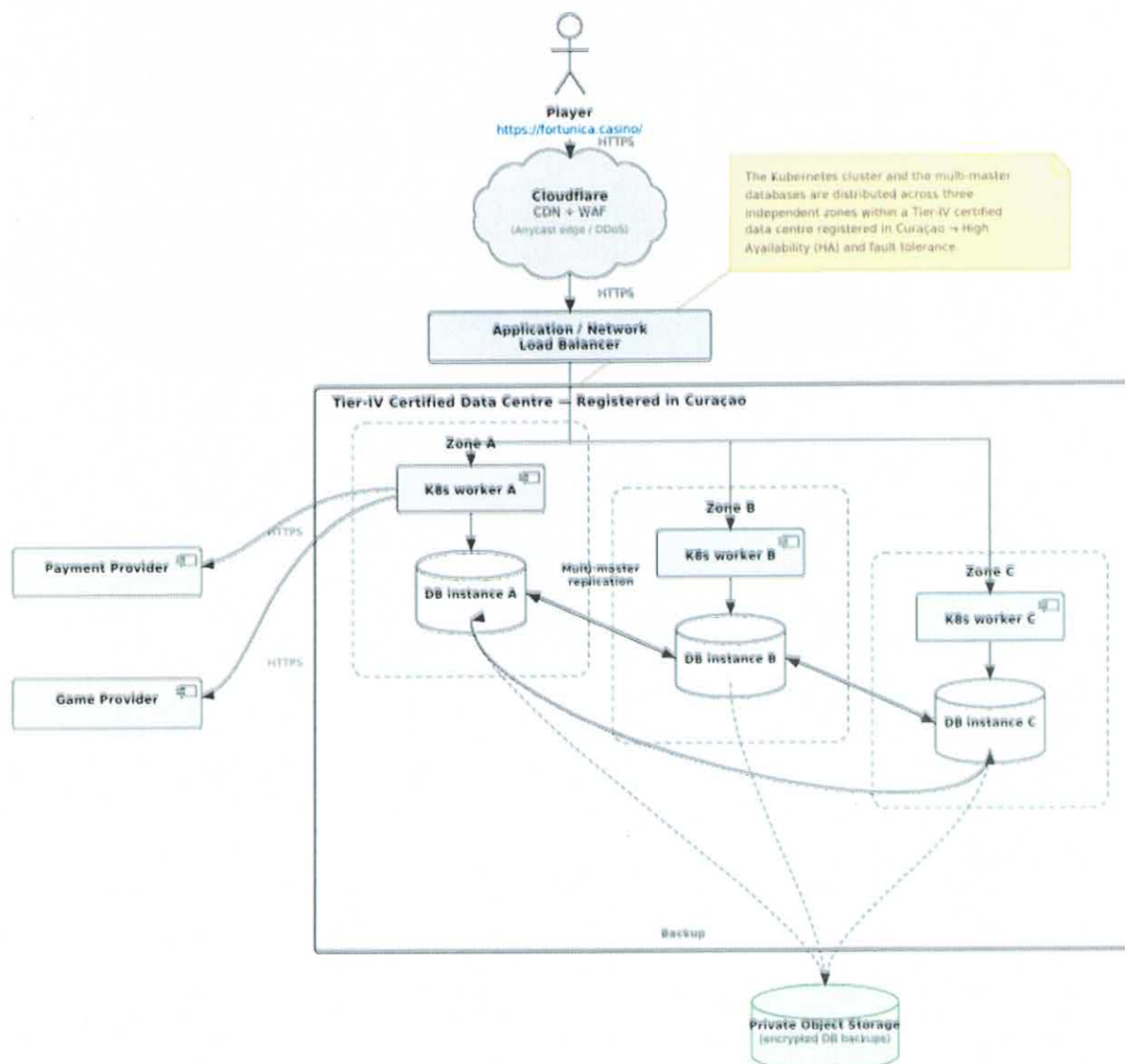
7. Player eligibility and access controls

The Company applies the following measures to prevent persons who must not play – in particular minors and self-excluded Players – from accessing the Games of Chance:

- Only persons aged eighteen (18) years or older may register or play. Age is verified through the Player’s date of birth and a valid government-issued identity document; additional documentation (a recent photograph/selfie, proof of address) or reputable third-party database checks may be required.
- Where a Player is found to be, or is reasonably suspected of being, underage, the account is closed; deposits made by the minor are returned and any winnings are voided, subject to AML freezing rules, and records of all age-verification checks are retained.
- Upon a self-exclusion or cooling-off request, the account is immediately deactivated and the Player is blocked from logging in, depositing and playing for the selected period; a self-excluded Player cannot log in, create a new account or make withdrawals during the exclusion period.
- Operator-initiated exclusion is applied as a high-risk intervention where problematic gambling behaviour or criminal activity is identified.
- KYC, sanctions and PEP screening are applied at onboarding and on an ongoing basis, in line with the Company’s AML/KYC Policy; accounts from prohibited jurisdictions are not permitted.

8. Technical infrastructure and business continuity

This chapter describes the technical infrastructure operated by Promotech N.V. through fortunica.casino, and the measures in place to restore the operation in the event of a technical emergency. The accompanying diagram below illustrates the architecture, the data flows between components and the redundancy provided across independent zones.



All servers used to deliver the Curaçao-licensed offering are hosted in a Tier-IV certified data center registered in Curaçao. The Tier-IV classification provides fully fault-tolerant infrastructure with concurrently maintainable and independent power, cooling and network paths, supporting a high level of facility availability.

8.1 Infrastructure components

Players connect only over encrypted HTTPS (TLS) to <https://fortunica.casino/>. Inbound traffic passes through a Cloudflare CDN + WAF layer providing TLS termination, DDoS mitigation, bot management and caching, before reaching an Application / Network Load Balancer that distributes requests across the application and continuously health-checks nodes. The gaming application runs as containerized workloads on a Kubernetes cluster, with worker nodes deployed across three independent zones. Player and transaction data are held in a multi-master database cluster distributed across the same zones and

kept consistent through continuous replication. Database backups are encrypted and stored in a private, access-controlled object-storage bucket. The platform integrates over secured HTTPS connections with the Payment Provider and the Game Provider.

8.2 High availability and fault tolerance

The architecture is designed to eliminate single points of failure. The application and database layers are distributed across three independent zones within the Tier-IV facility, each with independent power, cooling and network paths. The load balancer automatically reroutes traffic away from any failed node or zone, multi-master replication ensures every database instance holds a current copy of the data, and the data centre itself provides redundant utility infrastructure. As a result, routine maintenance and individual component failures can be absorbed without interrupting service.

8.3 Data backup

Backups of the production databases are taken automatically on a regular schedule, encrypted both in transit and at rest, and held in storage isolated from the production environment. Backup integrity is verified, and restorations are tested periodically to confirm that backups are usable. Backups are retained for an appropriate period in line with the Operator's record-keeping and regulatory obligations.

8.4 Restoration in the event of a technical emergency

The Operator maintains a documented Business Continuity and Disaster Recovery (BC/DR) procedure, with the response scaled to the nature of the event:

- Failure of an application node or zone — workloads are automatically rescheduled onto healthy nodes in the remaining zones, with no interruption to players.
- Failure of a database instance — the surviving multi-master instances continue to serve requests, and the failed instance is rebuilt and re-synchronised from a healthy peer.
- Loss of a complete zone — service continues from the two remaining zones, with capacity rebalanced automatically.
- Data corruption or loss — the affected data is restored from the most recent verified backup.
- Total facility outage — the platform is rebuilt from encrypted backups onto recovery infrastructure, and edge/DNS routing is repointed once the environment is verified operational.

The Operator maintains defined recovery objectives intended to minimize data loss and ensure prompt restoration, while keeping a degraded-but-available service running through single-component and single-zone failures. Technical emergencies are detected through continuous monitoring and alerting; on detection, the responsible team invokes the BC/DR procedure, executes the appropriate restoration path, and notifies management and, where required, the Curaçao Gaming Authority.

8.5 Security controls

All traffic is encrypted in transit (TLS) and data is encrypted at rest. The edge WAF and DDoS mitigation protect the application, network segmentation isolates the database and backup layers, and administrative access is restricted, authenticated and logged. The infrastructure and the Tier-IV facility are subject to periodic security review.

9. Responsible gaming

The Company implements the principles of responsible gaming required under the LOK and its license conditions. The framework is set out in the Company's Responsible Gaming Policy, published on the Website, and is summarised below.

9.1. Safe and secure environment

Players play in a secure environment: data-protection and security measures are applied, customer support is available 24/7, and staff with customer contact complete responsible-gaming training, with annual refresher training. Affiliates and marketing partners must complete responsible-gaming training before promoting the Company's services.

9.2. Fair and clear Games

Fairness is ensured through certified RNGs and regularly audited gaming systems, and the terms and conditions and Game rules are presented in a clear and accessible format so that Players have full visibility of the operational procedures and rules.

9.3. Preventing vulnerable persons from playing

Only persons aged 18 or older may play. The Company monitors Player behaviour using a combination of automated monitoring systems and manual review – including deposit and wagering patterns, session duration, withdrawal reversals, use of multiple payment methods, frequent changes to limits, repeated use of responsible-gaming tools, support-contact patterns and enhanced monitoring of Players under the age of twenty-five (25). Where potential signs of problem gambling are identified, the Company may send targeted responsible-gaming communications, encourage the Player to set deposit or session limits, restrict account functionality, or refer the Player to recognised external support services. General information on gaming addiction, self-assessment tools (such as the Gamblers Anonymous 20-Question Test) and links to recognised support organisations are made available, together with references to device-level blocking software.

9.4. Tools to limit or discontinue play

Players may set limits on the total amount they may deposit over a chosen period; requests to reduce a deposit limit take effect immediately, while requests to increase a limit are subject to a mandatory seven (7) day cooling-off period. Cooling-off periods of 24 hours, 7 days, 1 month or 3 months are available, after which access resumes automatically. Self-exclusion is offered for 1, 3, 5 or 10 years or permanently, with a default of one (1) year where no period is specified; upon request the account is immediately

deactivated, the exclusion is irrevocable for its duration, and reactivation after the period requires written confirmation by the Player.

10. Terms and conditions

- 10.1.** The general terms and conditions applied by the operation (the “Terms”) govern the relationship between the Company and the Player. The current Terms are published on the Website at <https://fortunica.casino/en/terms-and-conditions> and are also available there for download as a PDF. The most recent version is always accessible on the Website; by continuing to use the Website after any update, the Player is considered to have accepted the revised Terms. Where there is any discrepancy between language versions, the English version prevails.
- 10.2.** The Terms address, among other matters: the parties (including the authorised payment agent); player accounts, registration and eligibility (including the requirement to be at least 18 years old and the list of prohibited jurisdictions); the prohibition of duplicate accounts; deposits and withdrawals, including KYC and source-of-funds requirements, withdrawal conditions, processing times and limits; Politically Exposed Persons; collusion, cheating, fraud and criminal conduct; account closure, suspension and termination; crashed and aborted games; exclusion of liability and force majeure; intellectual property; the handling of player personal information and cookies; complaints and notices; and governing law.
- 10.3.** The Terms are supplemented by the related player-facing documents published on the Website, namely the Bonus Policy, Betting Rules, Rules of Play, Refund/Cancellation Policy, Privacy Policy, Cookies Policy and AML & KYC Policy. Together these documents set out the complete contractual framework presented to Players.

11. Player complaints and dispute resolution

- 11.1.** The Company operates a transparent complaint-handling and dispute-resolution procedure, set out in its Complaints Policy and published on the Website. Only registered Players may submit complaints, and the right is non-transferable.
- 11.2.** Filing. Complaints are submitted to complaints@fortunica.casino from the email address registered to the Player’s account, and should include the Player’s full name, residential address and country, account number, the relevant dates, a description of the issue and any supporting evidence. A complaint may be filed within six (6) months from the date the issue occurred (for bets, from settlement of the bet; for poker and player-to-player games, from the end of the game session).
- 11.3.** For responsible-gaming complaints (e.g. self-exclusion), receipt is acknowledged within 2 business days and a full response is provided within 5 business days, extendable by up to 2 weeks where further investigation is required. For all other complaints, receipt is acknowledged within 7 calendar days and a final response is provided within 4 weeks, extendable by a further 4 weeks for complex cases. The Player receives a written response with the outcome in every case.

11.4. If any complaint is not resolved to the Player's satisfaction, the Player has the right to refer such complaint free of charge to an alternative dispute resolution ('ADR') entity by email at disputes@egis-adr.com.

12. Record-keeping and data hosting

12.1. The Company declares that it keeps digital records of critical information about Players, their gaming transactions and their financial transactions, and keeps these records available to the CGA at all times on servers of a Tier-IV certified data centre registered in Curaçao, in accordance with the applicable requirements of the LOK and its license conditions.

12.2. These records include Player identity and account data; gaming transactions (bets placed, game results, sessions and timestamps); financial transactions (deposits and withdrawals, payment methods used, amounts and timestamps); and risk and AML records (risk assessments, alerts, investigations and related decisions). The records are retained for a minimum period of five (5) years and stored in accordance with applicable data-protection requirements.

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Owner of the Document	Inga Grope, Compliance Officer



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(SMES) Solutions for Management and Employment Support N.V.

Managing Director

Date 23.06.2026