

Business Plan Rozert N.V.

Prepared for the Curaçao Gaming Control Board

March 2024

Strictly Private and Confidential

Contents

Strictly Private and Confidential	1
Contents	2
1. Business Summary	3
2. Future Business Model	3
3. Competition Analysis	4
4. Target Markets	5
5. Marketing Strategy	5
6. Ownership Structure	7
7. All entities Company Structure & Ownership Diagram	8
8. Company Funding & Background	9
9. Financial 99	
10. Management Team & Key Officials	9
11. Game Providers & Product Offering	11
12. Website Look & Feel	15
13. Technologies & Infrastructure, Gaming Infrastructure & Data Recovery	17
14. Player Onboarding	19
15. Operations, Back Office & Accounting	21
16. Banking (Gaming, Revenue & Player Protection)	22
17. Payment Schematic	23

1. Business Summary

Betmaster (a registered trademark and primary brand) is an established Gaming Operator licensed by Gaming Services Provider N.V. (holder of master license #365/JAZ) and operated by Rozert N.V., looking to obtain a Curaçao Gaming Control Board under the Company name Rozert N.V., herein referred to as Betmaster, being the primary brand of Rozert N.V. operations.

Websites currently maintained by Rozert N.V. under sub-licence regime:

- betmaster.bet
- betmaster.one
- casinoin.io
- casinoin.pe
- casinoin.one
- axwin.io
- bongo.gg
- bongogg.io
- mix4bet.com
- betfree.com
- genslot.com

2. Betmaster - Future Business Model

Betmaster the brand and future innovation:

- Betmaster is a gambling platform where players engage with fellow sports fans and their favourite games in a safe and secure environment. The goal is to have an active community, in which players can watch and play a variety of games and events.
- Fans will be allowed to bet on their favourite events as well as enjoy primarily casino-based games. Typical games are Soccer, Tennis, Basketball, and other major sports.
- The Betmaster team is dedicated to communicating with the community on all levels, including but not limited to; Analysts who provide deep insight in the growing sports genre, active support of grassroots movements, and transparent partnerships with established institutions.
- The team represents a broad spectrum of specialization, across management, technology, product, design, operations, and marketing. By creating a great player experience, offering a fully legal and safe place to play, Betmaster not only ensures that players are safe, but also that we are able to work with leading B2B partners to make sure the evolution of gaming is headed in the right direction.
- Integrity, transparency, and accountability underpin Betmaster operations, and these sound foundations will not only help create a great player experience but also put the business in a strong position to grow. All decisions will be made to optimise player experience, prioritising lasting relationships over short-term gains, and ensuring that the vulnerable and underaged are shielded.
- Continually monitor framework to ensure problem gamblers are identified early and to handle them appropriately, referring them to the best support services available
- Fraud and transaction monitoring will be conducted internally with the Company's compliance team.

Our vision of Betmaster:

1. Build a world-class online gambling platform that can compete with the leading international brands.
2. Provide the best customer gambling experience.
3. Be an innovative online sports betting platform which is built by a professional, experienced group of individuals.
4. It is our philosophy to build a user-friendly platform that is accessible to all.
5. Multiple Licence applications, across, jurisdictions are currently being applied for (See attached structure chart)
6. Providing:
 - 24/7 customer care service
 - Mobile-friendly
 - Welcome bonuses and ongoing promotions
 - A loyalty program that automatically gives rewards
 - A variety of betting options
 - Multiple languages:
English, Indonesian, Malaysian, Azerbaijani, German, Spanish, Italian, French, Hungarian, Norwegian, Uzbek, Polish, Portuguese, Romanian, Finnish, Tagalog, Vietnamese, Turkish, Bulgarian, Ukrainian, Greek, Kazakh, Hebrew, Hindi, Arabic, Thai, Japanese, Korean, Chinese.
 - Currencies available:
EUR, IDR, VND, THB, PHP, MYR, USD, JPY, KZT, ISL, RUB, GBP, TRY, NOK, INR, PLN, SEK, CZK, ZAR, MXN, CRC, COP, KRW, CLP, PEN, NGN, BRL

All the above options and features, including languages and currencies are available technically as a part of Betmaster platform setup and may be available on the licenced instances and domains in accordance with the needs of the target markets.

3. Competition Analysis

Main competitors of Betmaster are Bet365, Sportingbet, Betfair, Rivalo and Betano.

Considering the sizes of competing brands, Betmaster will penetrate the market with:

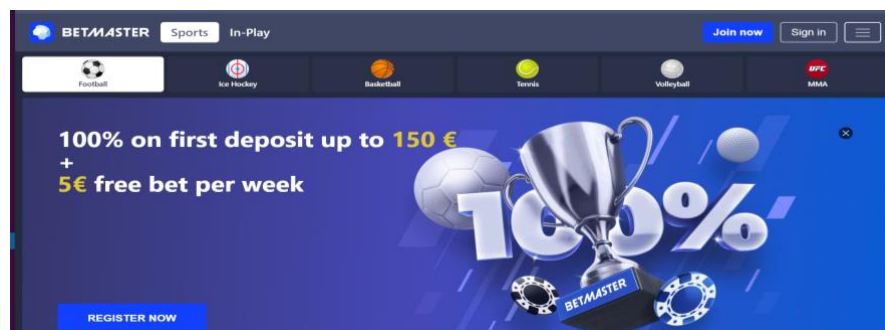
- More localised and personalised promotions for the users.
- Compelling promotions should attract more users and via our CRM activity to retain players, so they could enjoy the time with Betmaster at full capacity.
- Better casino offering from tier 1 game providers. On average 30% of sports betting users are being cross-sold to online casinos, hence we are eager to offer the best casino experience to such users.
- Variety of payment options offered by Betmaster
- At Betmaster we understand how paramount to have good customer support, therefore we take a more personalised approach while providing customer services support to our users 24/7/ 365 days a year.

4. Target Markets

- The marketing strategy will be focused on LATAM and ASIA markets
- The Company will focus on increasing its user base worldwide by moving in step with other markets where it is deemed appropriate having reviewed the relevant legal advice.

5. Marketing Strategy

- Betmaster has developed a marketing plan in order to attract new visitors to the website and to further convert them into loyal customers. The main instruments that we'll use: on-going promotions and welcome offers, Affiliate programs, SEO, SMS and e-mail communication.
- Betmaster will launch an ongoing promo to stimulate customers to register on the Betmaster platforms. The draft offer is the following:
- Make your first deposit and select your Welcome Offer:
- Select **100% first deposit bonus on Sport** to receive a 100% matched bet on your first deposit up to EUR 150 to use on Sports Betting only
- Select **100% first deposit bonus on Casino or Bingo** to receive a 100% matched bet on your first deposit up to EUR 100 to use on Casino/Bingo games only
If you wish to not take part in our Welcome Offer on your first deposit, select 'No bonus'



- In addition, Betmaster will use the Affiliate program to promote Betmaster. We have launched a special website that we'd use to promote; betmasterpartners.com. The potential affiliates register on the above website, accept the terms and conditions and start providing affiliate services and introduce Customers to us. We will be procuring and managing these services in our capacity as a manager of marketing services for Betmaster.
- The use of affiliates will be a major part of how Betmaster does customer acquisition and brand awareness. Affiliate deals are either made through a cost per acquired customer, or through a revenue share of the customers that said affiliates onboard to the Betmaster platform. Betmaster will only work with renowned entities that have responsible gaming, compliance, and ethical ideologies as their foundation.

Main Benefits:

- Betmaster focuses a lot of resources and competence into creating an enriched player experience, this automatically encourages a higher likelihood of repeat visits. Informing and attracting players will primarily be done utilising influencers targeting the now quite populous niche communities surrounding the sports and gaming industries. This is effective because of the pre-existing social standing of the influencer and the audience's proven willingness and interest in interacting with the public. Any influencers channel that endorses our product will be for adults only, with an age minimum of 18 years old. This is a critical part of our core values and is rigorously supervised by the Betmaster team.
- Another way we market our product is through paid search and display ads, which is useful to de-risk marketing costs.
- The Betmaster team via Discord and other social platforms is communicating directly with the users, generating positive brand engagement. Through these services, we are able to engage directly with our players, and this creates a level of trust that means everything to us. Our community of players can give criticism or feedback in an uncensored environment, and this again helps us to implement user-demanded features and tailoring our product to always be better.
- We expect that the above-mentioned activities will bring a good number of visitors to the website with a good registration turnaround. These numbers have been taken, into account, in the financial projections.



Flawless reputation

We don't cut limits or put payouts on hold. And we don't cancel bets.



Up to 51% revenue share

Typically we start from 25% revenue share. If you perform well, the share may increase up to 51%.



No revenue limits

There is no cap for your affiliate account revenues. The more we earn, the more you get.



Lifetime commission

We pay a lifetime commission on players generated through your affiliate account.

Betmaster has its own promotions system in place. That will allow Betmaster to have several types of promotions that are given to users either manually or automatically or by triggering some action (i.e. by user's pressing specific button on site or activating a promo code).

Bonus Types:

- Freebets are sportsbook bonuses when users are given an amount to make sports bets.
- Freespins allow users to play specific casino slots with a predefined amount of spins with predefined spin settings. The wins from the freespins are given to users as cash bonuses to their wallets.
- Wagers are given to users with requirements to spend some amount of money (preset amount, deposit amount or part of the deposit amount) playing on sports or casino to get the cash in their wallet. The bonus money for the wagers may be available for users to play right after the bonus activation.
- Cashback is the cash bonus transferred to the user's wallet.
- The cashback on losses bonus allows us to count the amount of user's losses in the predefined time frame and give some part of the losses as cash, wager or freebet.

- Cross-promotion bonuses allow us to create sports-casino cross-promotions, i.e. ask users to play some amount of money in a casino game and give them a freebet for the amount in the sportsbook.

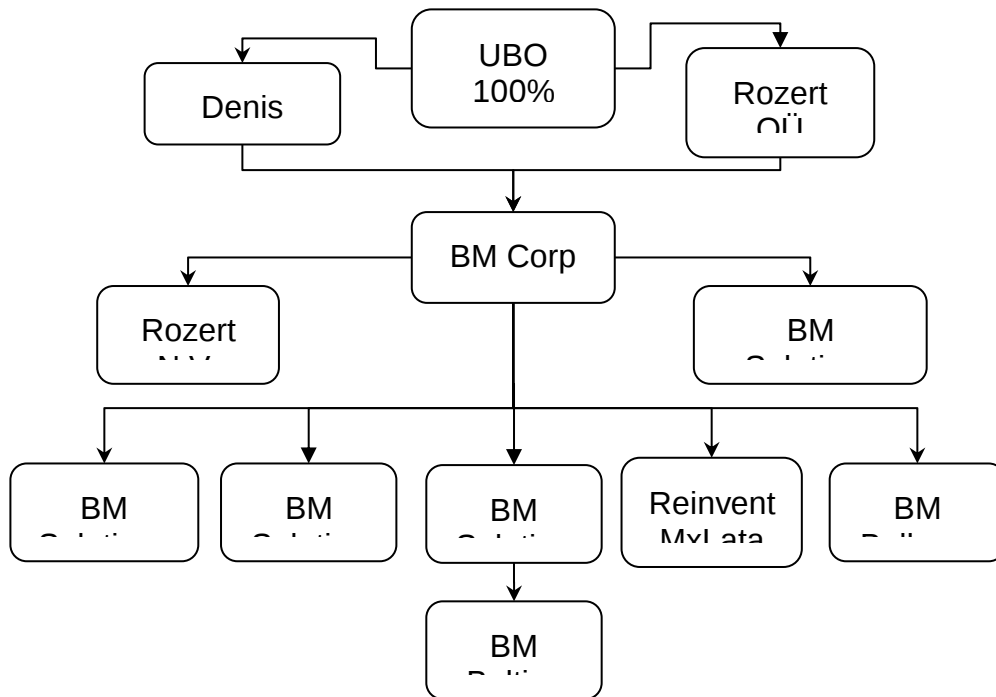
6. Ownership Structure

Companies and connected parties:

Denis Shadlov a Grenadian National, and resident of Estonia is the UBO for all Group Companies

- BMCorp Ltd. - a Malta-incorporated holding company, 100% holder of Rozert N.V.
- Rozert N.V. – Gaming Operator and applicant for the Curacao licence
- BMGate Ltd. – Payment Intermediary of Rozert N.V. & Trademark owner. Denis Shadlov is a UBO of BMGate Ltd. BMGate Ltd. is the owner of all group trademarks and licences them to the operators to brand the operations accordingly.
- BM Solutions Ltd is currently in possession of a Maltese gaming licence issued in October 2021 by the MGA, together with a Remote Bookmaker's Licence 1018081 issued by the Office of the Revenue Commissioners of The Republic of Ireland.
- BM Solutions DK Ltd., does not hold any other licences and has been created solely for the Danish Gambling Licence.
- BM Baltics Ltd is currently in possession of Estonian online casino and betting licences issued in August 2023 and March 2024 by Estonian Tax and Customs Board.
- BM Balkans d.o.o. is planning to apply for Online Gambling License from The Serbian Games of Chance Administration.
- BM Solutions GB Ltd, the company will apply for Remote Gambling License from Gambling Commission, United Kingdom.
- Reinvent MxLatam, S.A. de C.V. is currently operated under Mexican Remote Bookmakers Licence possessed in October 2012 by Mexican Gaming and Lottery Bureau.
- Rozert OU is an Estonia-based service and software development company, primarily providing services to its related companies in the online gambling and betting industry. Rozert OU provides services for customer support of the Betmaster platform.

7. All entities Company Structure & Ownership Diagram



All companies are established for operations in their own target markets according to their Licences and the players will not be mixed within companies

8. Company Funding & Background

- According to the Financial statements, management accounts and 3-year financial projections, the business of Rozert N.V. is profitable and projected to be profitable in the following 3 years. The operations of Rozert N.V. will be fully funded by its revenue. The business does not require any additional sources of funding.
- Due Diligence and Source of Wealth of the UBO, Denis Shadlov, has been provided along with the supporting documentation.

9. Financial Forecast

Please see attached to the application the 3-year financial forecast for Rozert N.V. business

10. Management Team & Key Officials

The Company has appointed the following as Director, CEO, and Compliance officer.

Denis Shadlov – CEO & CFO

Responsible for:

- Overall business performance
- Implementation of the strategy
- Leading negotiations with game providers and payment service providers
- Public figure of Betmaster
- Recruit and appoint necessary staff
- Determine the opportunities and align strategy
- Ensure that conducts its business in a way that will comply with all statutory requirements and financial targets

Boy Hendriks – Director of Ecorpp Management N.V.

Responsible for:

- Corporate affairs, including Company maintenance, administration and necessary registrations
- General Licence compliance and advisory
- A point of contact to the Curaçao Gaming Control Board and other relevant Curacao authorities

- Ensuring that the Company continues to comply with its licence obligations within the applicable guidelines, policies and related compliance procedures

Anatoly Zhupanov - CTO, CIO

Our Chief Information & Tech Officer, Anatoly Zhupanov, is an experienced IT professional with a demonstrated history of working in the information technology and services industry. He is skilled in Mobile VAS, Communication, Payment Solutions, E-money, Betting & Gambling.

He oversees and manages the iGaming platform maintenance, technical compliance & certification.

Corporate Services Provider

Ecorpp Management N.V. is a Company's CSP

<https://www.ecorpp.com/>

11. Game Providers & Product Offering

Betmaster integrates popular games from top providers as they are certified and loved by players.

The company offers wide range of online casino games, such as roulette, slots, live games, jackpots, table games, bingo, blackjack and baccarat, among others.

The Company has a mixed business model as the sources of the company's profit are both online sports betting and online casino.

- The system will maintain information about all games and/or lotteries played which includes the following:
 - the identity of the Participant
 - the time the Game began
 - the balance on the Participant's account at the start of the Game or the start of the Participant's participation in the Lottery (as relevant)
 - the sums placed by Participant placed in the Game (time-stamped)
 - the Game status (in progress, complete, etc.)
 - the result of the Game and/or Lottery (time-stamped)
 - the time the Game ended
 - amount won or lost by the Participant
 - the balance on the Participant's account at the end of the Game and/or Lottery (as relevant)
- the currency or currencies utilised by the Participant

The system will maintain information about the Sportsbook betting systems and will record the following:

- the identity of the Participant
- the time that the Bet was taken
- the balance in the Participant's account at the start of any Betting transaction
- the Bets made by any Participant
- amounts won or lost by the Participant
- the currency or currencies used by the Participant
- large wins (as agreed by the Commissioners from time to time)
- transfers of funds (between Participants or between any Participant and the Operator)

Sportsbook and Game providers:

Betmaster utilises the iGaming platform and games aggregation provided by an affiliated B2B business which is operated under the Torrero brand.

Torrero

website:

<https://torrero.com/>

Torrero is operated by two licenced companies:

Torrero Ltd., a company established in accordance with the laws of Malta, under the company registration number C98427, and having its registered address at The Edge Court, Office 2, Guze Duca Street, Hal Qormi, QRM 9088, Malta, is licensed and regulated to provide gaming and sportsbook B2B products by the Malta Gaming Authority (MGA), with license number MGA/B2B/935/2022, issued by the MGA on November 24, 2022.

Torrero N.V., a company established in accordance with the laws of Curaçao, under the company registration number 162912, and having its registered address at Hanchi Snoa 19, TRIAS Building, Willemstad, Curaçao, is licensed by Gaming Services Provider N.V., (holder of master license #365/JAZ).

Torrero tech system was duly certified by the top testing laboratory - eCogra, which shows compliance with strict information security, and change management rules.

Torrero aggregates and provides to the Company the games developed and licenced by including but not limited to:

Intuition Software Solutions Ltd, Isle of Man

EG Overseas Services B.V., Curacao

Play'n Go Hungary Kft, Hungary

Relax Gaming International Limited, Isle of Man

Netent International Limited, Isle of Man

Nolimit City Service Limited, Isle of Man

Topchik N.V., Curacao

Yggdrasil Gaming Isle of Man Limited, Isle of Man

SIA IMK 365, Latvia

N-Serve Ltd, Malta

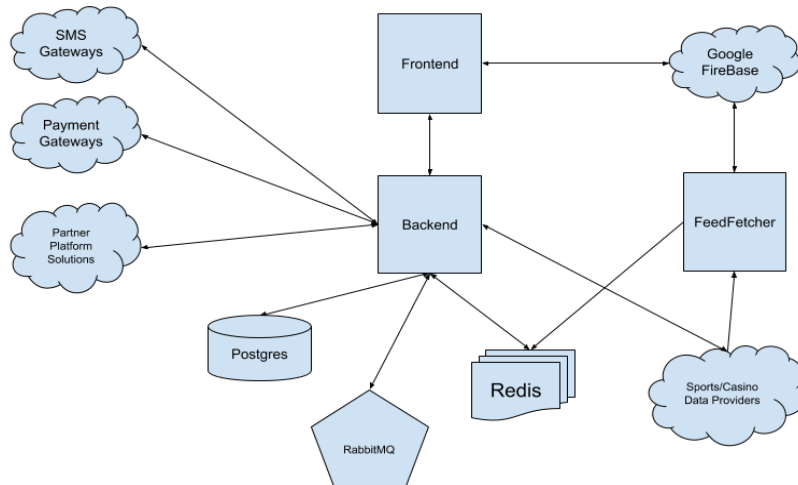
Sportradar

A sportsbook provider licenced and regulated in Malta (MGA/B2B/644/2018) for fixed odd betting data provision.

Betmaster uses only sportsbook and game providers, which have relevant certificates issued by the top-tier testing laboratories in accordance with the regulations of reputable gambling regulators.

Software - Gaming

- The sportsbook and casino system of Rozert N.V. is called “Betmaster” just like our primary brand.
- Betmaster aims to develop a quality and stable product for both sports betting and casino gambling. Our admin system is following strict security policies to limit access and assign permissions to the staff depending on their role.
- We aim to produce high-quality software that meets customer expectations and gambling authorities’ requirements.
- There are identified roles in the change management procedures ensures, that all new or improved functionalities are properly tested and developed.
- iGaming platform\backend Betmaster Application system overview is schematically presented in the picture below:



The main “Betmaster” module visibly consists of the following (see the picture below). It allows for a tailor made set-up for each possible web-site (product instance), including all the domains under the licence

BETMASTER				
Bets			View	
Casino categories	+ Add	Change		
Casino collections	+ Add	Change		
Casino providers	+ Add	Change		
Categories		Change		
Golden race tickets			View	
Hub88 actions			View	
Hub88 game sessions			View	
Hub88 games		Change		
Jackpot events	+ Add	Change		
Jackpots	+ Add	Change		
Markets			View	
MatchEvents			View	
Matches		Change		
Mobile app versions	+ Add	Change		
Netent actions			View	
Netent game sessions			View	
Netent games		Change		
Partner fees			Change	
Partner tariffs			View	
Partners			Change	
Playngo actions			View	
Playngo game sessions			View	
Playngo games		Change		
Pragmaticplay actions			View	
Pragmaticplay games		Change		
Slotegrator actions			View	
Slotegrator games		Change		
Softgaming actions			View	
Softgaming games		Change		
Super Tournaments		Change		
Teams		Change		
Tournaments		Change		
United games		Change		
Users		Change		
Xpressgaming actions			View	
Xpressgaming games		Change		

Apart from the user’s management, the main module allows users to do the following:

- Edit main casino properties (categories, providers, types etc)
- Edit casino games properties (visibility, restrictions, promotions availability, categories etc)
- Setup main sportsbook properties (matches, markets, teams, tournaments etc)
- Review all user’s actions within all games/sports bets

Depending on the permissions of the admin panel’s user it is possible to:

- Block/unblock user’s access to site, set specific restrictions (i.e. maximum bet amounts);
- Subscribe/unsubscribe from marketing communications;
- Apply bonuses/promotion campaigns;
- Set verification status;
- Review user’s editing history;
- See user’s promotions participation status & history;
- See user’s sports bets history;
- See user’s casino bets history;
- See user’s payment history;

The Company operates as a provider of online gambling available on mobile devices, tablets and desktop computers.

12. Website Look & Feel

Main Page

The screenshot shows the Betmaster website's main page. The top navigation bar includes links for Sportsbook, Casino, Virtual sports, Esports, Promotions, and a logo for Aviator. The main header features the Betmaster logo, a search bar, and buttons for Sign up and Log in. The left sidebar lists various sports categories: Top events, In-Play, Top Leagues (Premier League, UEFA Champions League, UEFA Europa League, LaLiga), and All Sports (Ice Hockey, American Football, Football, Basketball, Tennis, Table Tennis, Handball). The main content area is titled 'In-Play' and shows a table of football matches with odds. The table has columns for Events, 1, X, 2, Under, Total, Over, 1X, 12, X2, and a star icon. The matches listed are:

Events	1	X	2	Under	Total	Over	1X	12	X2			
Iran - Azadegan League Vista Turbine Shahin Bushehr FC	0	143	148	283	-588	2.5	382	-400	-200	-185	+54	☆
Iran - Azadegan League Kheybar Khorramabad FC Esteghlal Mollasani	0	102	171	374	-385	2.5	277	-556	-233	-130	+54	☆
Iran - Azadegan League Khosheh Talei Shams Azar Qazvin	0	100	173	380	-455	2.5	311	-588	-238	-128	+54	☆
Iran - Azadegan League Sanat Mes Kerman FC Arman Gohar Sirjan	0	178	131	252	-1000	2.5	564	-345	-175	-238	+53	☆
Bulgaria - First Professional League FC CSKA 1948 FC Pirin Blagoevgrad	0	-111	218	331	-204	2.5	156	-476	-303	-115	+54	☆
Turkey - Türkiye Kupasi Menemen Belediyespor Hekimoglu Trabzon	1	-182	316	424	244	2.5	-333	-667	-476	136	+54	☆
Moldova - Divizia Nationala Petrocub Hincesti FC Sheriff Tiraspol	0	539	320	-213	-133	2.5	104	162	-500	-909	+54	☆
Iran - Azadegan League Esteghlal Khuzestan FC	0	284	166	450	-610	2.5	350	-400	-200	-185	+54	☆

The right sidebar features a 'Bet slip' section with a message: 'Selected bets will appear here. Add 2 or more bets to place a multiple and win bigger gains.' Below this is a section for 'Browse all games' with a grid of slot game thumbnails including Lightning Roulette, Sweet Bonanza, Cash Quest, Live Mega Wheel, Hammer Gods, and Book of Dead. At the bottom, there is a banner for 'The perfect blend of...'.

Slots Page

The screenshot shows the Betmaster website's slots page. The top navigation bar is identical to the main page. The main header features the Betmaster logo, a search bar, and buttons for Sign up and Log in. The left sidebar lists various casino games: All 4900, Slots 4593, Jackpot 40, Roulette 30, Baccarat 14, Blackjack 42, Poker 37, Instant games 47, Sic Bo 4, and Other 35. The main content area is titled 'Popular' and shows a grid of slot game thumbnails. The games listed are:

Game	Game	Game	Game
Book of Dead	Lion's Hoard	Sweet Bonanza	Cash Quest
9 Pots of Gold	Money Train 2	Book Of Xmas Reloaded	Starburst
Ramsey's Book	9 Masks of Fire	Gemix 2	Aviator
Legacy of Oz	Mental DX1	Evil Goblins xBomb DX1	Hot Fruits 40

The right sidebar features a 'Browse all games' section with a grid of slot game thumbnails including Lightning Roulette, Sweet Bonanza, Cash Quest, Live Mega Wheel, Hammer Gods, and Book of Dead. At the bottom, there is a banner for 'The perfect blend of...'.

Sportsbook Page

Sportsbook
Casino
Virtual sports
Esports
Promotions
Rotator
Get App

Sports
In-Play
Sign up
Log in

Top events

In-Play

Premier League

UEFA Champions League

UEFA Europa League

La Liga

All Sports

Ice Hockey

American Football

Football

Basketball

Tennis

Table Tennis

Handball

In-Play
Ice Hockey
Football
Basketball
Tennis

Events	1	X	2	Under	Total	Over	1X	12	X2		
17 1st period Russia - WHL Shenzhen KRS Vanke Rays Skso	1	-1667	857	1970	135	5.5	-200	-	-	-	+67

All In-play

Italy - Serie A

Events	1	X	2	Under	Total	Over	1X	12	X2	
02 Dec 8:30 PM Torino FC Empoli FC	-130		265		320					

England - Premier League

Events	1	X	2	Under	Total	Over	1X	12	X2	
02 Dec 10:30 PM Tottenham Hotspur Brentford FC	-159		280		420					

Italy - Serie A

Events	1	X	2	Under	Total	Over	1X	12	X2	
02 Dec 10:45 PM Lazio Rome Udinese Calcio	-149		280		380					

Upcoming
Ice Hockey
American Football
Football
Basketball

Events	1	X	2	Under	Total	Over	1X	12	X2	
02 Dec 4:30 PM Russia - KHL HC Barys HC Dynamo Moscow	195	290	-114	-154	5.5	103	-139	-500	-323	+26
02 Dec 5:00 PM Russia - KHL Traktor Chelyabinsk Amur Khabarovsk	-222	330	420	-196	5.5	128	-769	-625	131	+26

Bet slip

Selected bets will appear here. Add 2 or more bets to place a multiple and win bigger gains.

Browse all games

The perfect blend of...

Live Casino Page

Sportsbook
Casino
Virtual sports
Esports
Promotions
Rotator
Get App

Slots
Live casino
Sign up
Log in

All 452

Roulette 73

Baccarat 123

Blackjack 141

Poker 17

Sic Bo 3

VIP tables 59

Other 78

Popular

All providers

13. Technologies & Infrastructure, Gaming Infrastructure & Data Recovery

Hosting

Our infrastructure is hosted with those hosting providers:

- Cloudflare (proxy) - World
- Digitalocean cloud (proxy) - Germany and UK
- Ovh cloud (primary) - France
- Ovh cloud (backup) - France

Software

- The software was developed internally by the team of Torrero managed by Anatoly Zhupanov (CTO and Data Protection Officer). The software is duly licensed to Rozert N.V.
- In some components of the system, integrations with third-party providers are used

The services developed internally include the following components:

- Web application
- Backend
- Frontend
- Back-office
- Set of content, technical support and risk management tools for the web application.
- Services that use integrations with third-party providers include the following components:

Sports and Casino Data providers:

- Sportradar
- Payment systems integrations:
 - Accentpay, APPEX, Astropay, Ecopayz, Zimpler, acquiring.com, iWallet, MuchBetter, Pay4Fun, Paydoo, Paysafe, Sticpay, Venus Point, YaarPay, Rupee
- Casino Data providers via the Torrero platform:
 - Yggdrasil, Pocket Games soft, Evolution, Pragmatic Play, VGT (Golden Race), FBMDs, Triple Cherry, Spadegaming, BGaming, RubyPlay, Netgaming, Wazdan (Volt), Play'n GO, Vagi (Barabarang), Vagi (Winfinity), Endorphina, Urgent Games, Vagi (Mancala Gaming), Platipus, Copacabana, PGM (PGSoft), Aviatrix, GameArt, SmartSoft, Tornado, CT Interactive, Amatic, Oddin, SpinTech (Swintt), Caleta, N2 Digital

Our infrastructure is hosted with those hosting providers:

- Cloudflare (proxy) - World
- Digitalocean cloud (proxy) - Germany and UK
- Ovh cloud (primary) - France
- Ovh cloud (backup) - France
- All clients get to us via proxy servers all the time (never directly).

- After getting through the proxy server, clients get to server web01/web02 in the local nginx. Afterwards, they get to the backend or frontend launched in kubernetes. Websockets, as the API goes through the local server.

Services

- Frontend/Backend works on worker-nodes in the kubernetes;
- Websockets land into betmanager launched in the kubernetes.

Hardware

- Infrastructure Hardware Specification
- Proxy hardware
- Qty 2
- Proxy software Servers
- Qty 2
- 1 vCPU
- 1 GB of RAM
- 30GB SSD

Web & Application Servers

- Qty 4
- 8 vCPU
- 32 GB of RAM
- 1TB SSD

Web & Application Servers (Standby)

- Qty 4
- 8 vCPU
- 64 GB of RAM
- 1TB SSD

Postgresql Replication Backup

- Qty 1
- 4vCPU
- 16GB RAM
- Raid1 2TB HDD

Gaming Infrastructure & Data Recovery

- The Company's gambling platform data, including but not limited to player registration, game data, bets, financial transactions history, login data will be backed up accordingly.
- Games and the sportsbook are provided by B2B providers in compliance with the licence and hosted on B2B providers' side.
- The backup reports for the safekeeping of data will occur at least daily.
- Information will be held for six years unless otherwise directed by an appropriate authority

Data Protection & Privacy Policy

The Company is strongly committed to maintaining the highest standards in privacy and protecting customers' personal data and shall take all relevant steps to adhere to the General Data Protection Regulation Act 2018.

- As part of the account opening process, the company will ask customers to provide personal information, including but not limited to, first and surname, postal address, e-mail address, username, date of birth and password as well as to certify that a customer is not underage.
- It will use that personal information to provide customers with products or services, confirm various financial transactions, to meet legal and regulatory requirements, to monitor website performance and to send events and news information. The name the customer registers with must be real. In addition, it is very important to ensure that information provided by a customer is valid, since it will be used in the course of validating financial transactions and the other aforementioned purposes.
- The Company undertakes substantial efforts to protect the confidentiality of the identity, preferences, and other information it has collected about individual customers and will not knowingly allow access to this information to anyone outside of the company, other than to the Player or to personnel of other companies related to or affiliated with the Company and to third party service providers who use personal information to provide services in respect of the Company's gambling services.
- All recipients of personal information shall be bound by applicable data protection laws, to keep personal information private at no less a level than that by which the Company is bound.
- The Company will be clear and open to customers about why and how personal information is collected and used. Where an individual has choices or rights, this shall be made explicitly clear on the Website Privacy Notice.
- The Company's General Data Protection Policy and Website Privacy Notice are accessible on the websites

14. Player Onboarding

- PEPs, sanction lists, open-source screening, ID and address verification are provided by **Sum&Substance**
 - <https://sumsub.com/>
- All players must register in accordance with the company's Anti-Money Laundering (AML) and Know Your Customer (KYC) procedures.
- No player under the age of 18 can register with the Company. A record of attempts of under 18 registrations is maintained for on-going screening purposes and confirmed their acceptance of the website terms and conditions.
- Known problem gamblers will be excluded from registration as will gamblers who have previously been excluded from the site. Gamblers wishing to re-register with the website will be required to send an email to the customer services team to request that their account be reactivated. Such requests will be reviewed on a case-by-case basis.
- Records will be maintained by the company of all current, attempted, and past registrations.
- Upon completion of all required registration fields and confirmation of acceptance of the terms and conditions, an email will be sent to the registered user at the email address provided. Registration will not take place if any of the registration fields are not completed.

- To activate their account, the player will be required to log-in to the company website using the link provided, upon successful input of their password the account will be activated.
- Monies cannot be deposited with the company and free units cannot be allocated into the account until it has been activated, as above.
- Duplicate accounts will not be allowed, and checks will be made at the time of registration.
- Fictitious names will not be allowed. Fictitious names will be identified at the time funds are deposited to the account and the account terminated.
- Players depositing over 2000 EUR or withdrawing any amount must undergo Step Two Verification. Withdrawals, tips, or deposits will be held until this verification is completed. During Step Two Verification, players are directed to a subpage where they must submit their ID. Only official IDs are accepted, and the electronic check ensures the accuracy of information provided in Step One Verification.
- Players that pose a higher risk will incur a customer risk assessment and a request for enhanced due diligence will be requested, collected by the customer support team and where applicable provided to the MLRO. For higher risk sign off.
- Participants who pose an additional risk will be marked in the back-office system and a monthly report of their transactions will be made available to the MLRO for review.
- All players will incur 'ongoing monitoring' based on their specific risk score (Low, Medium, High)
- All players will be subject to specific AML, Fraud and company-specific risk triggers where applicable

The full policy and procedures are included in the AML/CTF Manual.

The policies and procedures that Betmaster adheres to are developed internally. The quality of which has been duly tested by top regulatory bodies including but not limited to Ilse of Man, Malta and top testing laboratory - eCogra.

High Risk & Banned Territories will be reviewed and applied to both registration and the PSP and will incur ongoing monitoring.

Terms & Conditions

Full details on the Terms and Conditions are available on the websites.

15. Operations, Back Office & Accounting

- Betmaster finance team has access to the company's back office reporting system.
- A comprehensive user access control and audit trail system will be utilised in order to both manage and monitor admin user activities
- Betmaster finance team prepares consolidated management accounts for the operational companies and also keeps a live bank reconciliation and invoices schedule.

Helpdesk and Customer Services

- Customer support is an internal team of Rozert OU (an Estonia-based affiliated company), consisting of 13 people speaking different languages. The customer support team is dealing with queries and problems the player may face, including but not limited to AML and RG issues, that is why the staff is trained specifically for this reason.
- The Customer support team is 24/7 available to the customer. The members of this team are located in Estonia.
These services will include KYC Checks / AML Triggers / Complaints handling etc

Compliance and Responsible Gambling

- Betmaster has a Malta-based team which is responsible for the Compliance, RG, and high-risk issues in the already operating Malta and Ireland licenced domains, will take these ongoing monitoring work for Rozert N.V. as well.
- The Betmaster Malta-based compliance team consists of a Risk and Responsible Gaming Specialist and an AML Specialist.
Betmaster takes problem gambling very seriously and actively reviews customer accounts for signs of problem gambling. Where Betmaster knows or suspects a customer to be a problem gambler the relevant measures will be taken to protect them as outlined within the Responsible Gaming Policy.
- Betmaster customers have the option to self-exclude by non-automated means such as e-mail or live chat.
- Betmaster customers have the option to self-exclude by automated means through the 'my Account' section of the website. They have the option to self-exclude for 6 months, 1 year, 3 years, 5 years, or permanently.
- Betmaster offers customers who wish to control the amount of money they are gambling the opportunity to set a deposit limit.
- Betmaster has a responsible gambling page which highlights to customers how they can control their gambling and where to revert to if they feel they have an issue. The responsible gambling page is available on all website pages and does not contain any bonus offers or advertisements. Links to the GAMCare website can be found at the page.
- Betmaster reviews customer accounts to look for signs of problem gambling.
- Betmaster customers are able to view their gambling history within the 'my Account' section of the website. This includes all deposits, withdrawals and betting activity and assists customers by allowing them to monitor their gambling spend.
- Betmaster customers have clear access to their account balance at all times.
- In order to prevent fraudulent players and problem gamblers from re-registering an account with Betmaster parameters are checked upon registration/deposit against a blacklist database.

16. Banking (Gaming, Revenue & Player Protection)

Rozert N.V. utilises the services of the intragroup payment agent - BMGate Ltd, a Cyprus-based entity. BMGate Ltd. processes and manages the funds on behalf of Rozert N.V. pursuant to the agreement executed.

BMGate Ltd. contracts to PSPs under its name and for the benefit of Rozert N.V.

BMGate Ltd. uses the following financial solutions for operational and payment processing purposes.

Unlimint EU is a PSP & a bank account solution

Unlimint EU Ltd will be used for operational and player protection banking.

Unlimint is licensed and regulated by Central Bank of Cyprus as EMI. Licence number - 115.1.3.7

Register attached here: <https://www.centralbank.cy/en/licensing-supervision/electronic-money-institutions/licensing-and-supervision-of-electronic-money-institutions>

How Unlimint EU safeguards its clients' money:

- Unlimint follows the required measures mandated by the Central Bank of Cyprus for carrying out its business as a regulated Electronic Money Institution and for protection of funds that Customers keep with Unlimint.
- <https://www.legal500.com/guides/chapter/cyprus-banking-finance/>

Specifically, funds Customers keep with Unlimint EU are:

(i) segregated; and

(ii) safeguarded by means of being held on designated “clients funds accounts” with EEA regulated credit institutions or EEA Central Banks. These are regulated by the national supervisory authority for credit institutions in the relevant Member States or by the ECB and therefore are to adhere to respective EEA legislative funds security requirements as Unlimint.

- Clause (ii) means that Unlimint holds clients' money on designated “clients funds accounts” with EEA-regulated credit institutions or EEA Central Banks, the jurisdictions of which have implemented the Basel ii and Basel iii requirements into the law
- As to the FAFT compliance, Cyprus is a member of MONEYVAL and is not in any sanction, grey, blacklist, not in FATF AML Deficient List.
- Basel requirements and FATF recommendations are not a matter of financial institution compliance directly, but rather the jurisdiction itself and how it regulates and supervises banking and finance, how it implements these requirements and complies with them.
- Here is the overview of banking & finance regulation in Cyprus (Member of the EU). It is stated in clauses 13 and 15 that even the **Basel III framework has been transposed into the Cyprus Law** to the extent that it has been incorporated in EU Directive 2013/36/EU, including but not limited to Basel III liquidity requirements.
- Cyprus is a Member of Moneyval, being FATF and Basel compliant

Unlimint provides player protection account solution for egaming business in EU/EEA licencing jurisdictions. Unlimint specifically declares and confirms that the client account opened as a player funds protection mechanism is designated as a player funds account. Funds settled to this client

account are held in the interest of players. Unlimint declares and confirms that any requested information regarding such client account may be disclosed to the egaming authority.

As a EU-based group of companies, Betmaster organises its finance, accounting, tax planning .etc primarily from the EU perspective. Betmaster use Unlimint solutions (operational, player protection, merchant accounts) for all its companies and across all licenced jurisdictions, utilising the SEPA scheme and one-app digital banking for all the Group payments.

17. Payment Schematic

Payment Service Providers (PSP's)

- Betmaster understands that the integration of payment systems is an important step as well because operators should add trusted and reliable payment methods to their platforms and be able to proceed deposits from different sources of funds.
- Betmaster aims to provide a wide range of payment options to choose from, so players will be able to use the most convenient one for them.
- In our Application system the payments module is the main section to review and track all the financial transactions. Each payment system that Betmaster is integrated with has its own section inside that module.
- In accordance with PCI DSS regulations. BMGate Ltd. is PCI DSS complaint.
- Each user may have several wallets (**not accounts**). For each payment system that he/she makes a deposit with, the new wallet is made. This is needed to make sure that users deposit and withdraw to the same account/payment system and no exchanges within payment systems/currencies are made.
- The players can deposit funds only via various payment methods: card deposits with different payment systems (Visa, MasterCard); banking and e-wallets.
- Betmaster platform currently has integrations with these payment systems (integration work in progress for several more): Accentpay, APPEX, Astropay, Ecopayz, Zimpler, acquiring.com, iWallet, MuchBetter, Pay4Fun, Paydoo, Paysafe, Sticpay, Venus Point, Yaarpay, Rupee.
- Each payment system has its own limits and visibility (availability) depending on the user's country and currency based on Risk scoring

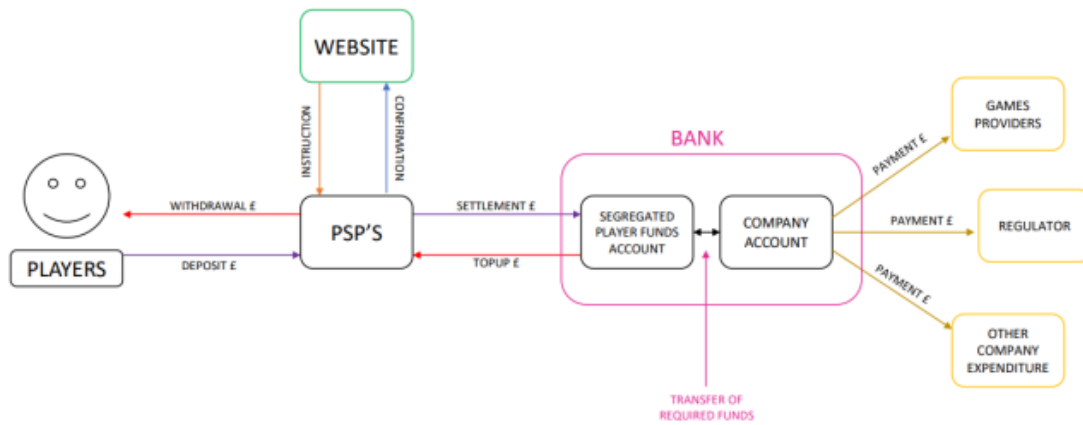
Payment Service Providers and Alternative Payment Methods (APM)

- Accentpay
- APPEX
- CoinsPaid
- Funanga
- iWallet
- Jeton
- Pay4Fun
- Paysafe for Skrill and Neteller
- Sticpay
- Tiger Pay
- Unlimint
- Venus Point

For each payment system we can see

- Date and time of transaction initiation.

- User ID;
- Type (deposit/withdrawal);
- Amount and currency;
- Obfuscated card number or payment system ID;
- Country, bank;
- Payment ID;



END OF DOCUMENT