

Curacao Gaming Authority

Scharlooweg 172-174

Curacao Gaming Authority

Date: 17 July 2026

Ref: Trigonon Group N.V.

CGA License condition questions

Dear Sir/Madam,

We refer to the subject questions raised in the License condition checklist regarding the points listed herein. As per the instructions on the above-mentioned checklist.

1. License Condition – Target Market

Instructions

The applicant to confirm (i) whether Brazil is a target market, and if it is, the applicant to supply the CGA with a copy of an opinion provided to it from a suitably competent Brazilian lawyer which supports a view that from January 2025, it is not arguably unlawful to remotely target Brazilian players without a local license; (ii) insofar as Turkey remains a target market its risk diversification and mitigation policies which also demonstrate how monies are legitimately moved in and out of the jurisdiction ; (iii) provide an update on the claim involving a Turkish customer and the Dutch court ruling in connection with the Bahsine site and as an ongoing obligation to promptly notify the CGA of any player claims being brought in the Netherlands or Curacao.

reply:

Brazil and Turkey are not targeting markets. The operator has verified that both jurisdictions are geo-blocked.

Bahsine claim; this is an old claim that was concluded and the case is closed. The High Court ruling is # **ECLI:NL:OGEAC:2021:214 and ECLI:NL:OGHACMB:2023:31**

The information is public information.

The site Bahsine was inactive and officially terminated with the master licensor CEG (Cyberluck). There is no ongoing obligation whatsoever.

2. License Condition – segregated funds

Instructions

The applicant is precluded from (i) using player funds for the company's cash needs and must hold such funds in segregated accounts;

reply:

Funds are kept in segregated account(s); players' funds are kept in the merchant account;

APCO Systems Limited

CHRISTOS IORDANIDIS

CHRISTOS IORDANIDIS (Jul 30, 2026 16:47:46 GMT+3)

Christos Iordanidis / The principal

Acknowledged by



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