

TRIGONON GROUP N.V.

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BUSINESS PLAN

Section 2 — Organisational Structure

Criticality 5 — Business and Corporate Information Enclosure

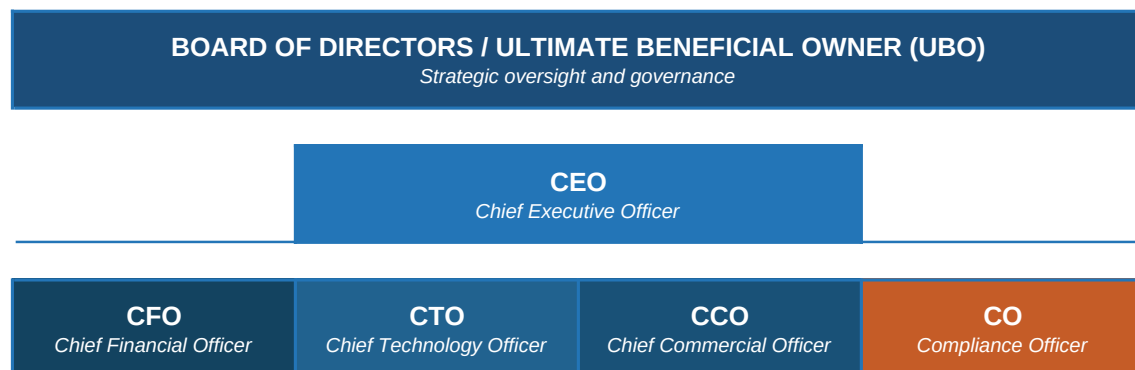
Submitted to the Curacao Gaming Authority (CGA) — June 2026

2.0 Organisational Structure

Trigonon Group N.V. is an online gaming operator offering sports betting (pre-match and live), eSports wagering, and casino products, targeting the European market. The Company operates under the licence issued by the Curacao Gaming Authority (CGA) and maintains a management structure designed to ensure clear separation of roles, defined lines of accountability, and an independent compliance function.

The five key management positions are: Chief Executive Officer (CEO), Chief Financial Officer (CFO), Chief Technology Officer (CTO), Chief Commercial Officer (CCO), and Compliance Officer (CO).

2.1 Management Organogram



Note: The Compliance Officer reports to the CEO for day-to-day matters and holds an independent reporting line directly to the Board of Directors for compliance and regulatory matters. This ensures the integrity of the compliance function is not subordinated to commercial interests.

2.2 Reporting Lines

Role	Reports To	Direct Reports
Board of Directors / UBO	N/A	CEO
CEO (Chief Executive Officer)	Board of Directors	CFO, CTO, CCO, CO

CFO (Chief Financial Officer)	CEO	Finance team
CTO (Chief Technology Officer)	CEO	IT & Development teams
CCO (Chief Commercial Officer)	CEO	Marketing, Sales, Product
CO (Compliance Officer)	CEO / Board (independent)	Compliance & AML/KYC teams

2.3 Role Profiles — Responsibilities and Controls

CEO — Chief Executive Officer

Reports to: Board of Directors / UBO

Key Responsibilities	Controls & Authority
- Overall management and strategic direction of the Company. - Primary accountability to the CGA for all licence obligations and regulatory compliance. - Approves major commercial agreements, partnerships, and new market entries. - Ensures the Company operates within the terms and conditions of its gaming licence at all times. - Chairs internal management meetings and implements Board decisions.	- Single-signature payment authority up to EUR 50,000; joint authority with CFO above this limit. - Final sign-off on all material regulatory notifications and CGA correspondence. - Accountable to the Board for agreed business KPIs, reviewed quarterly.

CFO — Chief Financial Officer

Reports to: CEO

Key Responsibilities	Controls & Authority
- Financial planning, budgeting, and management reporting to the Board. - Treasury and cash flow management; oversight of all payment processing arrangements. - Maintenance of segregated player funds accounts, separate from operating funds, as required by CGA. - Statutory accounting and tax compliance (Curacao and applicable jurisdictions). - Financial transaction monitoring in coordination with the Compliance Officer.	- Joint signing authority (with CEO) on all payments exceeding EUR 50,000. - Monthly written certification to the Board confirming player funds segregation. - Primary contact for external auditors; presents audit findings to the Board.

CTO — Chief Technology Officer

Reports to: CEO

Key Responsibilities	Controls & Authority
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• Design, operation, and maintenance of the gaming platform (sports betting, casino, live streams). • Integration and oversight of third-party content and technology providers (Microgaming, NetEnt, Joingames). • Information security, data protection (GDPR), and system uptime (target 99.9% SLA). • Technical infrastructure for KYC identity verification and AML transaction monitoring. • Business continuity planning and disaster recovery testing.	• Approval authority for all production platform changes and third-party system access. • Commissions at least one independent penetration test per year; reports results to CEO. • Leads incident response for security breaches; notifies CEO within 1 hour of any confirmed breach.
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CCO — Chief Commercial Officer

Reports to: CEO

Key Responsibilities

- Commercial strategy, revenue targets, and product roadmap across all betting and casino verticals.
- Marketing and customer acquisition across all channels; responsible for compliance of all promotional materials with CGA guidelines.
- Management of affiliate programme and commercial partnerships.
- Customer service quality and complaint resolution standards.
- Maintenance of the excluded/geo-blocked markets register.

Controls & Authority

- All marketing materials reviewed for CGA compliance before publication.
- Promotional campaigns exceeding EUR 100,000 require CEO co-approval.
- Unresolved customer complaints beyond 30 days escalated to CEO and Compliance Officer.

CO — Compliance Officer

Reports to: CEO (day-to-day) • Board of Directors (independent functional line)

Key Responsibilities

- Design and operation of the AML/CFT compliance programme, including policies, procedures, and staff training.
- KYC and customer due diligence processes, including enhanced due diligence for high-risk customers.
- Responsible gambling controls: deposit limits, self-exclusion, reality checks, and player protection mechanisms.
- Preparation and submission of all required regulatory reports to the CGA; maintenance of the regulatory correspondence log.
- Filing of suspicious activity reports (SARs) with the Curacao Financial Intelligence Unit (FIU).

Controls & Authority

- Independent right to report directly to the Board and to the CGA without CEO authorisation; this right cannot be restricted.
- Authority to place a hold on any customer account or transaction pending AML review, without CEO approval.
- Sole authority to determine whether a SAR is filed; no other officer may override or delay this decision.

Trigonon Group N.V. commits to maintaining a management structure that meets the requirements of the Curacao Gaming Authority and to notifying the CGA promptly of any material changes to the key roles described in this section. Named individuals for each key management position will be submitted to the CGA under separate cover together with the required fit-and-proper documentation upon request.

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