

OPERATIONS MANUAL

Satoshi Gaming Group N.V.

Version: 1.0

Effective Date: [2026/01/01]

Review Date: [2027/01/01]

1. PURPOSE

This Operations Manual has been established and is maintained in strict accordance with **Article 5.9 of the National Ordinance on Games of Chance (LOK) of Curaçao.**

The purpose of this manual is to document the operational, technical, compliance, responsible gaming, player protection, and digital record-keeping procedures implemented by the License Holder (Satoshi Gaming Group N.V.).

This manual shall be reviewed at least annually and updated whenever there are material operational, regulatory, or technical changes to reflect prevailing industry standards and shall be made available to the Curaçao Gaming Authority (CGA) for inspection **within five (5) working days** upon receiving an official request.

2. COMPANY INFORMATION

Legal Entity

- **Company Name:** Satoshi Gaming Group N.V.
- **Registration Number:** 151832
- **Registered Address:** Dr. M.J. Hugenholzweg 25 Unit 17-B, Curaçao
- **Gaming License Number:** OGL/2024/664/0280
- **Website:** trustdice.win

3. DESCRIPTION OF GAMING OPERATIONS

(LOK Article 5.9(1)(a))

3.1 Games Offered & Outcome Determination

The Operator offers Casino Games (Slots, Table Games, Live Casino, Video Poker, Instant Games), Sports Betting (Pre-match, In-play, Virtual Sports), and Other Games (Crash Games).



- **Outcome Determination:** Game outcomes are dictated solely by Certified Random Number Generators (RNG), live dealer events, and verified third-party sports result feeds. No employee may influence game outcomes.

3.2 Eligible Customers

The Operator provides gaming services **exclusively to natural persons**.

- **Corporate entities**, partnerships, trusts, foundations, nominee arrangements, and all other legal persons or corporate arrangements are **strictly prohibited** from registering or operating accounts.
- The Operator does not offer corporate, business, agent, merchant, or shared player accounts. Any account found operating for commercial purposes or on behalf of a third party will be permanently closed.

3.3 Payment Methods & Financial Limits

- **Cryptocurrency:** Bitcoin (BTC), Ethereum (ETH), USDT, USDC, Litecoin (LTC) etc.
- **Betting Limits:** Minimum bet is USD 0.10. Maximum risk-based limits apply automatically based on game type and player risk profiles.
- **Payout Structure:** Payout percentages are automatically generated by software using certified Return to Player (RTP) settings and sportsbook odds calculation engines. Software providers are restricted to licensed, third-party certified entities (e.g., Pragmatic Play).

4. QUALITY ASSURANCE AND PERIODIC TESTING

(LOK Article 5.9(1)(b))

4.1 Internal Test Methods

The Operator deploys automated and manual test methods to monitor the quality and compliance of:

- Account registration and age gate blocks;
- Deposit and withdrawal clearing sequences;
- Bonus calculations and KYC/AML tracking functionality.

4.2 Frequency and Independent Certification

- **Daily:** Automated transaction monitoring.
- **Weekly:** Operational and technical performance review.
- **Monthly:** Compliance gap analysis and incident register review.
- **Independent Testing:** Core gaming and RNG software are certified periodically by independent test laboratories (e.g., GLI, BMM Testlabs, iTech Labs).

5. DATA STORAGE AND DATA PROTECTION

(LOK Article 5.9(1)(c))

5.1 Personal Data Collected

The Operator processes personal data relating **only to natural persons**. Information collected includes: full legal name, date of birth, residential address, nationality, email, telephone number, government-issued IDs, proof of address, source of funds, and transaction histories.

- *Note:* Because corporate customers are strictly prohibited, no corporate registration documents or corporate Ultimate Beneficial Ownership (UBO) records are maintained within the player onboarding database.

5.2 Storage Method and Access Controls

- **Storage:** Player data is stored in secure databases utilizing AES-256 encryption.
- **Access Controls:** Restricted via strict Role-Based Access Controls (RBAC) to the Compliance, AML, Customer Support, and Senior Management teams. Access logs are audited quarterly.
- **Data Retention:** All records are retained for a minimum of **five (5) years** after account closure, or longer where legally mandated by Curaçao AML/CFT regulations.

6. PLAYER INTERFACE AND VISUAL ELEMENTS

(LOK Article 5.9(1)(d))

The gaming website interface displays the following core visual elements to players at all times:

- Active Curaçao Gaming License validation seals and company information;
- Accessible links to the Terms and Conditions, Privacy Policy, and Responsible Gaming guidelines;
- Interactive player protection tools, self-exclusion toggles, and complaint submission interfaces;
- Real-time individual player account, transaction, and gaming histories.
- *Archive:* Screenshots of all major visual page updates are systematically cataloged in the Compliance Archive.

7. PREVENTION OF PROHIBITED PLAYERS

(LOK Article 5.9(1)(e))

The technical infrastructure applies automated blocks to completely bar the following prohibited persons from accessing the platform:

- **Underage Persons:** Strict age verification and ID document authentication gates ensure no one under 18 can play.
- **Non-Natural Persons:** Applications submitted by legal entities or businesses are automatically rejected at the registration gate.
- **Self-Excluded Persons:** Real-time validation checks are run against the internal self-exclusion database and the national responsible gaming database.
- **Sanctioned and High-Risk Entities:** Automated customer screening is cross-referenced continuously against UN, EU, OFAC, and UK Treasury sanctions databases. Geo-blocking (IP blocking) is enforced against comprehensive sanctioned and restricted jurisdictions.

8. TECHNICAL INFRASTRUCTURE & DISASTER RECOVERY

(LOK Article 5.9(1)(f))

8.1 Infrastructure Overview

The technical environment consists of the Website Front-End, Core Gaming Platform, CRM, and AML Transaction Monitoring tools.

- **Hosting Environment:** Pursuant to LOK requirements, the database servers hosting critical player, gaming, and financial records are located on a server of a **Tier-IV certified data center registered in Curaçao**.

8.2 Business Continuity & Disaster Recovery (DR)

- **Recovery Targets:** Recovery Time Objective (RTO) is 4 Hours; Recovery Point Objective (RPO) is 15 Minutes.
- **Restoration Possibilities:** In the event of a technical emergency, traffic is automatically rerouted to a secondary geographically separated environment. Databases are backed up synchronously, allowing complete data restoration to the last verified RPO check-point.

9. RESPONSIBLE GAMING PROGRAM

(LOK Article 5.9(1)(g))

The Operator implements a comprehensive responsible gaming framework via the following technical controls:

- **Player-Managed Protection Tools:** Accessible deposit limits, loss limits, session timers, cooling-off periods, and permanent self-exclusion options.
- **Risk Monitoring:** Automated behavioral monitoring flags indicators such as excessive deposit spikes, chasing losses, extended continuous sessions, or high-frequency failed

withdrawals, escalating the player account to the Responsible Gaming Officer for immediate intervention.

- Where appropriate, withdrawals may also be reviewed for Responsible Gaming concerns before approval.

10. MANDATORY ANNUAL PERMANENT EDUCATION

(LOK Article 5.9(4))

The License Holder implements a mandatory **Permanent Education Program** provided on an **annual basis** to all directors, officers, employees, contractors, and persons working in the field of Games of Chance.

10.1 Core Training Modules

The educational curriculum focuses explicitly on:

- **Mental Well-being:** Identifying signs of gambling distress and cognitive biases.
- **Responsible Gaming:** Execution of player limits, self-exclusion protocols, and harm mitigation.
- **Anti-Bribery & Corruption (ABC):** Corporate integrity, detecting internal corruption, and reporting bribes.
- **Crime Prevention & Anti-Money Laundering (AML/CFT):** Red flags in crypto transactions, tracking illicit fund flows, and SAR submission.
- **Player Communications:** Empathetic, clear, and objective interaction with vulnerable players.
- **Responsible Advertising:** Ensuring marketing materials do not target minors or vulnerable populations.

10.2 Role-Based Specialization

Training is tailored depending on the employee's operational role to reflect the specific knowledge and experience expected:

- *First Line (Support/Marketing):* Focuses heavily on player communication, responsible advertising, and early identification of red flags.
- *Second Line (Compliance/Risk):* Focuses heavily on advanced AML/CFT investigations, ABC escalations, and regulatory updates.
- HR maintains verified attendance, completion logs, and assessment scores for a minimum of five (5) years.

11. TERMS AND CONDITIONS

(LOK Article 5.9(1)(h))

The current authorized text of the General Terms and Conditions used by the operation is attached hereto as **Appendix A**. All revisions undergo strict version control and must be logged in the Document Control matrix.

12. PLAYER COMPLAINTS AND DISPUTES

(LOK Article 5.9(1)(i))

12.1 Submission and Escalation Process

Players can submit formal disputes via live chat, support tickets, or dedicated email. Dispute resolution follows a strict escalation ladder:

- **Level 1:** Customer Support Tier 1 (Initial review).
- **Level 2:** Compliance Department (Detailed file investigation).
- **Level 3:** Senior Management (Final internal determination).
- **Level 4:** Independent third-party alternative dispute resolution (ADR) or submission to the **Curaçao Gaming Authority (CGA)**.

12.2 Resolution Timelines

- **Initial Acknowledgement:** Within 48 hours.
- **Final Substantive Response:** Transmitted to the player within 30 business days.

13. DIGITAL RECORDS MANAGEMENT

(LOK Article 5.9(1)(j))

The Operator maintains digital records exclusively of natural person players and their transactions. All critical records are kept permanently available to the CGA on a server housed within a **Tier-IV certified data center registered in Curaçao**:

- **Player Records:** Onboarding timestamps, age/identity verification records, KYC files, and risk ratings.
- **Gaming Records:** Digital logs of all bets placed, wins, losses, session lengths, and game RTP parameters.
- **Financial Records:** Crypto wallet addresses, Blockchain transaction hashes (TxIDs), Deposit records, Withdrawal records, Asset type, Timestamp, Network used, AML monitoring results.
- **AML/CFT Records:** screening logs, transaction alerts, source of funds reviews, and Suspicious Activity Reports (SAR).
- **Audit & System Logs:** Complete user activity logs, administrator adjustments, and critical system or security events.

APPENDICES

- **Appendix A** – General Terms & Conditions
- **Appendix B** – Responsible Gaming Policy
- **Appendix C** – AML/CFT & KYC Policy
- **Appendix D** – Player Complaint Policy
- **Appendix E** – Information Security Policy
- **Appendix F** – Sanctions Policy

POLICY APPROVAL

This Operations Manual has been reviewed and approved by the Final Authority of TrustDice and shall remain in force until amended or replaced under ministerial regulations.

- **Approved By:** UBO

- **Signature:** _____
- **Name:** Yongfu Cao
- **Date:** 01/01/2026