

Key Compliance Officer

Date: 29-04-2025
Subject Letter of Appointment Compliance Officer

To Whom It May Concern.

Dears,

Hereby we inform you that Antonio Zanghi has been appointed as the Compliance Officer at Owl in N.V. (the "Company") as per April 28, 2025.

This position is crucial for ensuring that our operations adhere to the regulatory requirements and standards pertinent to the gambling industry.

Antonio Zanghi will be responsible for overseeing the following tasks:

- compliance strategies;
- monitoring and adherence to legal and regulatory standards;
- ensuring the highest level of compliance integrity;
- reporting to the relevant AML/CTF authorities;
- Designing, implementing and make the necessary changes to the AML program;
- Ensuring compliance with Curaçao laws and regulations regarding money laundering and terrorist financing;
- Reviewing adherence to the policies and procedures maintained by the Company;
- Analyzing transactions and identifying those subject to reporting under the Ministerial Decree on Indicators for Unusual Transactions;
- Reviewing internally reported unusual transactions for completeness and accuracy;
- Design an internal procedure about when reporting of unusual transactions will lead to blocking/ freezing of user accounts;
- Conducting further investigations into unusual transactions if necessary;
- Preparing external reports on unusual transactions;
- Maintaining records of both internally and externally reported unusual transactions;
- Staying informed about local and international developments related to money laundering and terrorist financing and suggesting improvements to management;
- Preparing periodic reports on the efforts against money laundering, terrorism financing, and proliferation financing conducted by the Company
- Organizing staff training sessions on compliance-related issues.

Key Compliance Officer

Yours Sincerely,



On behalf of Owl in N.V.

Name: eMoore N.V.

Title: Managing Director

Date: 29-04-2025

Signed by Proxy Holder Chantal van der Leeuw

