

CLUBHOUSE MEDIA N.V.

Business Plan

Apr-2024

Table of Contents

Business Overview.....	1
Corporate Structure	3
Board / Management Structure.....	4
Key Service Providers	6
Key Suppliers	7
Brand	9
Platform	10
Product Offering	11
Marketing / Advertising.....	12
Analytics	13
Operations	14
Policies and Procedures.....	15
Risk Management / Internal Control Systems	17
Financial Projections	18
Conclusion.....	20
Overview	1
Risk & Compliance: Three-Dimensional Approach	3
1: Technology	6
2: Internal Control Systems	8
3: Resources	9
Risk / Compliance – Key Functional Areas	10
1: GEN-RM: General Risk Management	11
General Risk Management	11
Internal Controls System Management	11
Policy Management	11
Risk and Compliance Training	12
Modelling / Analysis / Reporting.....	12
Industry Associations / Publications	12
2: OPS-RM: Operations Risk Management.....	15
General Operations.....	15
Customer Management	15
Operations Reporting.....	15
Training – General Operations.....	15
Training – Risk / Compliance Operations	15
3: PAY-RM: Payments Risk Management	17
Payments Management / Control Systems.....	17
Payments Analytics / Monitoring / Reporting	17

Payment Provider Management	17
4: PROD-RM: Product Risk Management	19
Product Management / Onboarding	19
Live Product Mechanisms / Processes	19
Product Provider Management	19
5: MAR-RM: Marketing Risk Management.....	21
Marketing Management.....	21
Acquisition Marketing	21
Retention Marketing.....	21
Marketing / Advertising Standards and Guidelines	21
6: WIN-RM: Winners Risk Management	23
Winners Payment Risk Mechanisms	23
Risk vs. Margin Management	23
Winners Risk Provider Management.....	23
7: TECH-RM: Technical Risk Management	25
Network / Systems Administration.....	25
Support	25
Platform Based Controls	25
Internal Control Systems.....	25
8: CORP-RM: Corporate Risk Management	27
Corporate Governance.....	27
Licensing Governance.....	27
Finance	27

Business Overview

Clubhouse Media N.V. (CHM) resulted from the discussions of two long-term gaming industry parties.

Lydia Mc Loughlin (UBO) is a seasoned gaming professional with over 15 years of global gaming experience (operator and B2B provider) who was looking to start a new online gaming business.

The DK Group (Virid Pty Ltd, Adept Holdings) having known and worked with Lydia for over 10 years, has 25 years of international gaming experience as an operator and a service / platform provider.

CHM brings together Lydia's entrepreneurial spirit and long-term gaming experience, with the complimentary knowledge, infrastructure, and experience of the DK Group. Virid Pty Ltd is also providing start-up funding under a formal agreement.

Lydia is the UBO of the CHM Business, ably supported by the DK Group with key service provision and technology infrastructure.

Although (CHM) is technically considered a start-up, it has a small but highly experienced global team of people and key service providers with over 20 years of international lottery and gaming experience. Coupled with decades of operations, customer service, payments, risk and compliance, and digital marketing experience, CHM intends to leverage these strengths to become a leader in the mobile / online lottery space.

With innovation at its core CHM's goal is to position the company as a market leader for mobile and web-based bets on lottery style products. CHM aims to do this by keeping its site extremely accessible and user friendly, whilst offering a highly personalised experience for customers. CHM will strive to keep users engaged with the site through a myriad of games, promotions and draws, and will be a one-stop-shop, offering bets on customers' favourite lotteries at a competitive price.

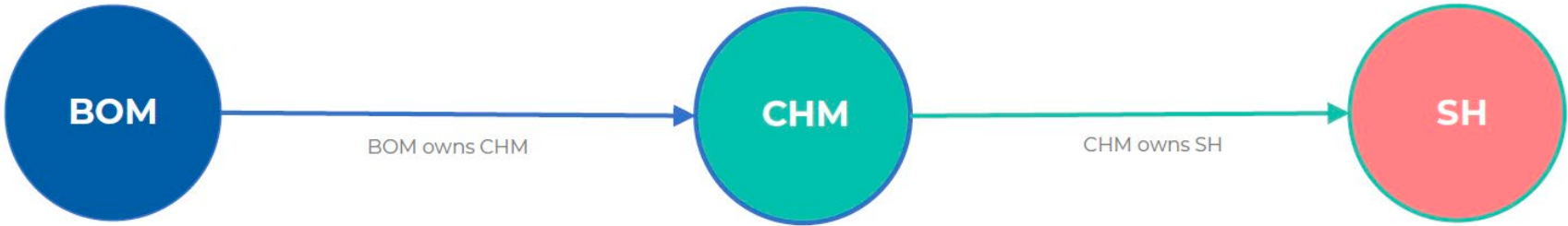
CHM's technology leverages best practices and game mechanics, offering customers a more engaging and fulfilling experience. CHM will maximise customer retention through the use of advanced CRM, data mining, analytics and knowledge, to offer targeted and relevant offers and notifications personalised to each customer's behaviour on the site. CHM will offer exceptional customer service that positions the company as a reputable and trustworthy licensed operator.

Some key points of difference in terms of CHM's overall approach and offering include:

- CHM utilises a proprietary platform that:
 - Has been designed, built, and optimised as a mobile first play.
 - Has been designed and built from ground up with high end analytics in mind.
 - Is designed to be highly personalised in terms of its offering to players. For example, "home pages" will be personalised and tailored to customers preferences and purchasing behaviour.
- Product.
 - CHM will be offering a wide range of international lottery products for customers to bet on.
 - In addition to local and international lotteries, CHM will offer keno, scratch card, and instant win style games.
 - This will enable CHM to provide a highly engaging website with draws constantly taking place, displaying a wide selection of prizes, as well as varying price points to appeal to a very broad range of consumers, including light betting or casual players.
- Marketing / Advertising / Communications.

- The CHM marketing personnel has 15+ years of online marketing and advertising experience, including in lottery and gaming.
- CHM conducted extensive global research on lottery / gaming competitors and best practice e-commerce sites.
- CHM is approaching marketing / advertising from four distinct but complimentary perspectives.
 - Earned Media.
 - Owned Media.
 - Paid Media.
 - Shared Media.
- Utilising superior analytics CHM's marketing and advertising approach will be deeply data and knowledge driven.
- CHM is working with world class design and digital marketing teams to maximise marketing and advertising spend and efficiency.
- Using the wealth of data collected CHM will offer its customers and prospective customers, highly relevant, targeted, appropriately priced, and timely offers.
- Data Mining / Analytics.
 - Analytics have been baked into the foundation of the CHM platform.
 - CHM will utilise highly experienced analytics professionals with many years of experience both in gaming and general internet / e-commerce environments.
 - CHM will continually create, review, and enhance its data mining and analytics approach.
 - CHM intends to use advanced BI, Machine Learning and AI techniques to maximise the return of the business while at the same time minimising risk to the business.
- Operations.
 - The CHM operations team have decades of operational experience running lottery and gaming businesses.
 - CHM puts customer satisfaction and proactive customer support at the forefront of its business approach.
- Payments.
 - CHM understands the critical importance of holistic and effective management of the entire Payments ecosystem.
 - CHM utilises a dedicated Payments Platform, that is gateway and payment method agnostic.
 - Ensuring both smooth payment flows for customers, along with rigorous payments risk and compliance controls.
 - CHM has payments personnel with extensive online payments experience.
- Risk / Compliance Management.
 - CHM takes a risk adverse approach to managing and running an international gaming business.
 - CHM will utilise experienced risk and compliance personnel with decades of lottery / gambling related risk and compliance experience.
 - CHM employs a suite of risk management tools, analytics, and reporting, to manage risk across the depth and breadth of the business.
 - CHM works closely with key risk and compliance service providers to minimise fraud, AML, and chargeback risks.
 - The CHM Risk personnel have 15+ years of experience working in government licensed and regulated lottery and gaming businesses.
 - CHM engages industry leading external advisors in relation to policy creation and management.
- Finance.
 - CHM utilises an experienced Finance team who specialise in the financial management of lottery / gaming businesses.
 - This includes 15+ years of international FX management experience.

Corporate Structure



Blue Oxford
Media Ltd (BOM)

- **Purpose:** Holding Company
- **Location:** Anguilla
- **Directors:** John Dyrud, Crefton Gumbs, Lydia McLoughlin
- **Shareholder:** Lydia McLoughlin (100%)
- **UBO:** Lydia McLoughlin (100%)

Clubhouse
Media N.V. (CHM)

- **Purpose:** Operating Company
- **Location:** Curacao (N.V. License)
- **Director:** XCM (Corp. Director)
- **XCM Directors:** Christopher van Rosberg, Lorenzo Godett
- **Shareholder:** BOM (100%)

Stillesque
Holdings Ltd (SH)

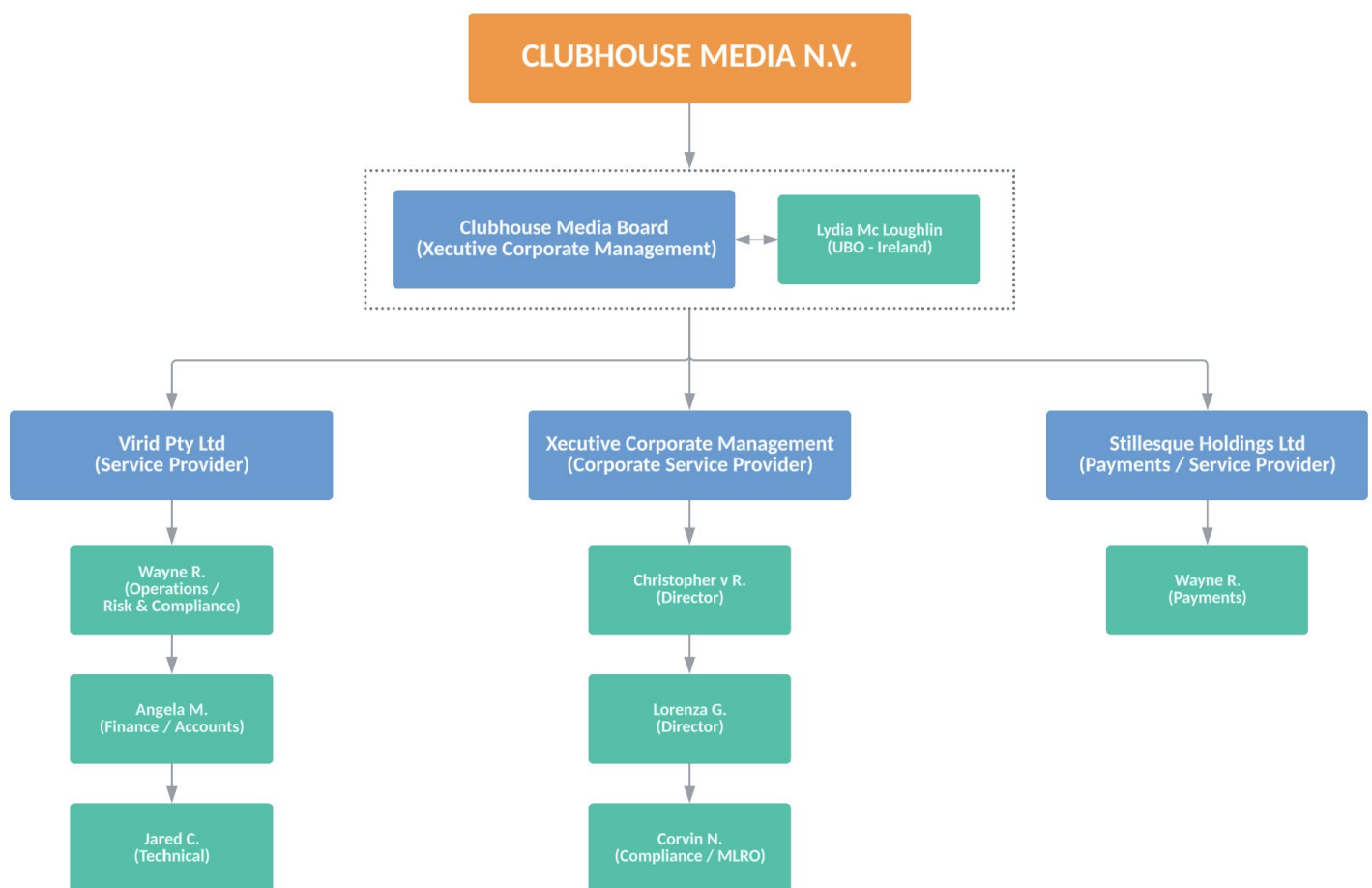
- **Purpose:** Services Company
- **Location:** Cyprus
- **Director:** Panlegal Limited (Corp. Director)
- **Panlegal Director:** Constantia Michaelidou
- **Shareholder:** CHM (100%)

Board / Management Structure

Although CHM has been established for a number of years, the formal launch of the business has been delayed by COVID and COVID related matters. As such CHM is considered a start-up, and utilises a small, but experienced team of personnel and key service providers.

Overall strategy and direction is set by the Board with input from the UBO (Lydia McLoughlin). Key internal resources and service providers are responsible for carrying out the day-to-day operations of the business.

Additional resources are planned and expected as the business grows following the formal launch. The details of which are to be confirmed based on the growth trajectory and financial performance of the business, as well as the specific resource needs based on that growth.



Board matters, decisions, and direction includes, but is not limited to the following:

- Overall Business Performance / KPI's Review.
- Key Service Providers Management / Direction.
- Key Suppliers Management / Direction.
- New Product Research.
- Key Tech / MarTech Platform Review and Direction.
- Legal and Financial Matters and Considerations.
- Risk and Compliance Matters / Review.

Following board meetings Lydia Mc Loughlin works with key internal parties and service providers to execute board meeting decisions and directions.

In addition to provide essential business services, the Key Service Providers will be responsible for the creation and submission of monthly reports to the board, to cover operational and risk / compliance matters.

CHM utilises a panel of external advisors that includes industry groups, industry experts, industry periodicals, third-party providers and suppliers.

Key Service Providers

The following companies provide essential services to the CHM business:

Xecutive Corporate Management (XCM)

XCM is a Curacao based Corporate Service Provider that provides a range of fiduciary and compliance services to CHM, including the role of MLRO.

Stillesque Holdings (SH)

SH is a wholly owned subsidiary of Clubhouse Media (CHM). SH provides a range of services to CHM, utilising internal resources and external third parties, including the provision of payment facilitation services.

Virid Pty Ltd (VIR)

Virid Pty Ltd brings nearly 30 years of gaming experience to the table. Virid provides a range of services that include, but are not limited to the following:

- Finance / Accounts.
- Operations.
- Marketing.
- Payments.
- Tech.

Adept Holdings Pty Ltd (ADH)

Adept Holdings has developed a gaming platform that allows B2B clients to offer gaming products to clients via a website and associated platforms. Adept Holdings will licence the use of this platform to CHM.

Key Suppliers

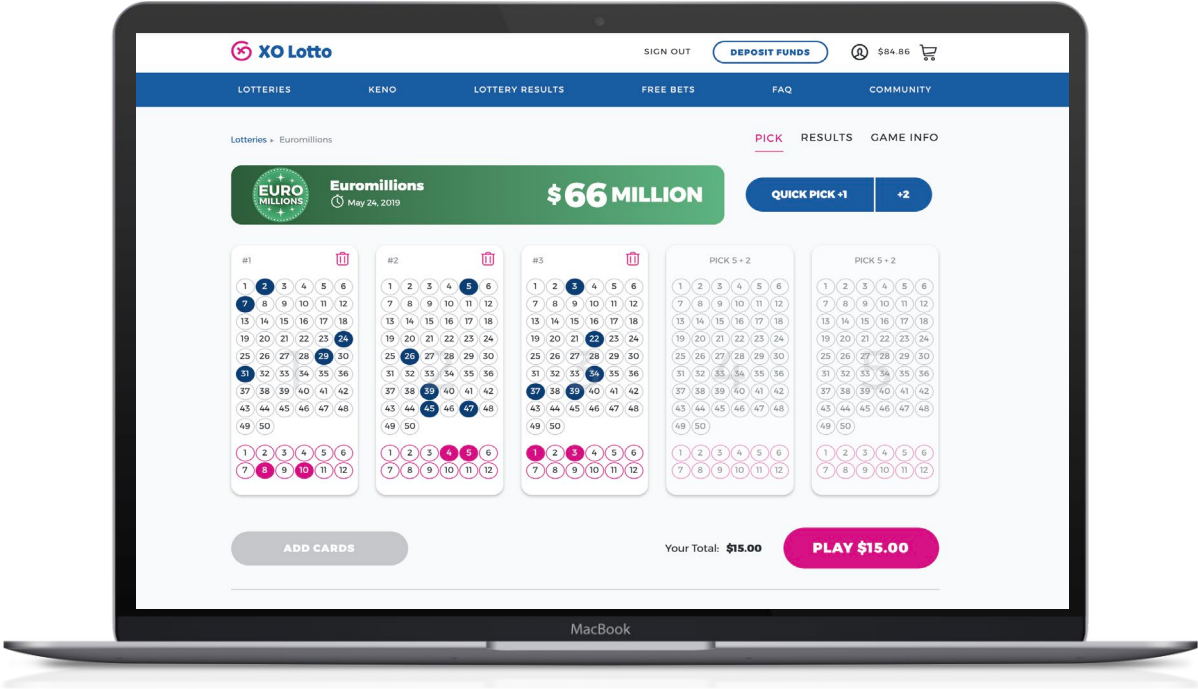
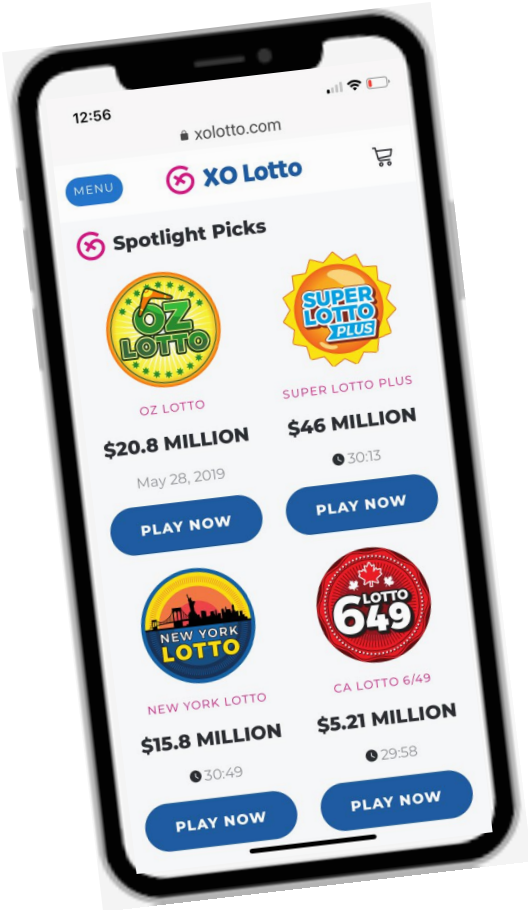
The following are the key suppliers to the CHM business:

Supplier Name	Link	Description
Banking		
Narvi	https://narvi.com/	Preferred Banking Partner
Payments		
Rebilly	https://www.rebilly.com/	Centralised Payment Platform
Gigadat	https://gigadatsolutions.com/	Interac Payment Provider
D24	https://www.d24.com/	Card payments, bank transfers, e-wallets
MuchBetter Wallet	https://muchbetter.com/	E-Wallet
Payz	https://payz.com/	E-Wallet
Finrax	https://finrax.com/	Crypto Payment Processor
Product (Games)		
Emirat	https://www.lottery-insurance.com/	Lottery Insurance
Ltech	https://www.ltech.com/	Lottery Ticket Provider
Blue Ocean Gaming	https://blueoceangaming.com/	Casino Game Aggregator
Marketing		
Optimove	https://www.optimove.com/	CRM Platform
Operations / Customer Service		
Internal Platform		
Zendesk	https://www.zendesk.com/	Customer Service Software
Analytics		
Internal Platform		
Optimove	https://www.optimove.com/	CRM Platform
Rebilly	https://www.rebilly.com/	Centralised Payment Platform

Supplier Name	Link	Description
Risk / Compliance		
ShuftiPro	https://shuftipro.com/	Identify Verification / KYC / AML Platform
GBG	https://www.gbgplc.com/en/	Identify Verification / KYC / AML Platform
Optimove	https://www.optimove.com/	CRM Platform
Rebilly	https://www.rebilly.com/	Centralised Payment Platform

Brand

CHM’s brand and consumer facing site is XO Lotto:



Platform

CHM's innovative and proprietary platform has been built from scratch with the following in mind:

- Mobile First.
 - Highly mobile optimised platform that is engaging and entertaining but very lightweight in nature.
 - Designed, built, and continually optimised to operate well under very heavy traffic loads, and beyond the limits of competitors comparable sites.
- Third Party Technology Partners.
 - CHM researched and engaged world's best technology partners to ensure the platform is cutting edge and innovative, yet extremely functional and easy to use.
- Multi-Language / Multi-Currency Offering.
 - Multi-language and multi-currency were key principles when designing and architecting the CHM platform.
 - It's theoretically possible for CHM to offer any combination of language and currency to any customer in the world.
- Products.
 - Utilising a suite of analytics and reports to continual optimise and improve the product offering.
 - Designed to very quickly and easily integrate new products, whether the content be derived internally or from external third-party sources.
- Marketing / Advertising / Communications / Analytics.
 - Analytics have been baked into the platform from day one to ensure CHM can offer its customers / prospective customers highly relevant, targeted, appropriately priced and timely offers.
 - Facilitates cutting edge / innovative marketing and advertising methods to be easily managed from the platform.
- Operations / Risk and Compliance.
 - The platform was designed to make management of the platform and business, efficient and data / knowledge driven.
 - Underpinning and supporting the job of operations / risk and compliance personnel.

Product Offering

Key Products and Features:

CHM's predominant product offering will be based on the sale of bets on the outcome of regulated and official world-wide lotteries. Their goal is to curate and introduce the most exciting lottery games and products to consumers.

Key Products include:

Lotteries

CHM offers bets based on the outcome of a number of lotteries, both high jackpot lotteries as well as lower jackpot lotteries offering better odds of winning. All lotteries are officially regulated, and all outcomes are directly correlated to the official draw of such lottery. The lotteries product offerings will be the largest focus of the business.

Keno

CHM also offers bets based on the outcome of select regulated keno games. When placing a bet on the outcomes of regulated keno games, consumers bet on the outcome of the official keno draw. Keno games can be differentiated by multiple variables, including frequency of draw, prize amounts, and odds of winning.

Scratch Cards & Instant Win Games

CHM is working with tier one providers to curate and offer the best cross-platform scratch card and instant win style games. The main focus will be to provide a mobile first experience with fun, engaging and exciting games that can be played at any time.

Marketing / Advertising

The CHM's team's extensive experience in both lottery and general online marketing gives the business a competitive advantage with marketing efforts.

Online Acquisition and Retention

CHM works on a low churn model, so will focus equally on quality customer acquisition and retention. With decades of experience catering for the needs of global lottery players, the CHM team is ideally placed to acquire new, and retain existing customers. Online marketing will be CHM's primary channel for driving new users and retaining existing customers. Once again, CHM will make use of their sophisticated data mining tools and experience to maximise response, by presenting digital advertising to prospective and existing customers based on a multitude of market segmentation characteristics and behaviours.

CHM's primary customer retention strategies include communication via email, web, and mobile notifications. They will strive to make every touch point with their customers one that adds value, and as relevant and well-timed as possible. This coupled with high level customer service will ensure that CHM retains valued customers.

Excluded Markets

The list of excluded markets is updated as advised and required, but is currently as follows:

- Australia.
- Hong Kong.
- Netherlands, Dutch West Indies, and Curacao.
- United Kingdom.
- United States of America and its dependencies and territories.

Analytics

One of the most significant pillars that underpins CHM's business is Analytics. CHM will utilise the latest technology, methods, and approaches, combined with personnel that are highly skilled and experienced in lottery and gaming-based analytics. This includes but is not limited to the following:

- Technology.
 - Analytics is built into the fabric of the CHM platform and related systems.
 - Not just to capture data but also to assist with the performance management of the platform / site.
- Product.
 - Constantly reviewing site product performance so the product mix can be continually refreshed and improved.
 - Providing the information and knowledge-based backbone to enable CHM to offer a highly customised and personalised per customer view of the site.
- Marketing / Advertising / Communications.
 - Using analytics to maximise the effectiveness of all marketing and advertising spend.
 - Including but limited to identifying the best combination of digital ads and advertising channels.
 - Monitoring and adapting customer communications so customers are receiving unobtrusive, timely, and highly targeted communications from the XO Lotto platform.
- Operations.
 - Monitoring and reporting on all aspects of the CHM business, so the highly experienced CHM personnel can quickly identify and rectify any operational or platform-based issues.
- Payments.
 - Real-time monitoring, analysing, and optimising of all Payments KPI's.
 - Real-time monitoring, analysing, and optimising of Payments Risk.
- Risk / Compliance.
 - Providing the CHM Risk / Compliance personnel with high level analytics and reporting to assist with the risk and compliance oversight of the CHM business.
- Analytics Roadmap.
 - Machine Learning / AI.

CHM's Analytics Roadmap includes the use of machine learning and AI, both in the provision and optimisation of marketing and advertising, through to customer service and support.

Operations

General Operations

CHM has engaged the services of highly skilled and proficient lottery and gaming personnel and service providers, with deep experience running all aspects of an efficient, robust, and socially responsible lottery / gaming business.

Customer Service: Ensuring the Highest Quality of Service for Every Customer

CHM is utilising Zendesk as its customer service platform and will focus heavily on offering an excellent customer service experience, with users able to contact CHM's friendly team through multiple channels including email and web form. CHM aims to have very prompt responses to all enquiries. The customer service team will have direct access to CHM's technical staff, to ensure all technical enquiries are handled in a timely and informative manner.

Ultimately, CHM intends positioning itself as a company where customers feel a strong sense of reassurance when placing bets, as a licensed and reputable company who is there to provide them with the necessary customer support to address any questions or issues immediately.

Policies and Procedures

Protecting Customers and the CHM Business by Enforcing Strict Policies and Compliance

CHM will work closely with all key service providers (i.e. legal advisors, risk, and payment providers) to ensure the latest methods and approaches to these policies are identified, discussed, and implemented, where appropriate and beneficial.

CHM will ensure that operational and customer service staff are trained in all aspects of the CHM Policies and Procedures. This will include initial and on-going training for all personnel involved, ensuring on-going compliance to these policies.

The following is a brief overview of the key CHM policies.

Terms and Conditions

Based on decades of Lottery and Gaming experience CHM has created an extensive and comprehensive set of Terms and Conditions for the operation of the business. CHM will continually monitor, review, and amend the Terms and Conditions as necessary.

Privacy Policy

CHM has engaged the services of dedicated privacy experts and lawyers to craft a comprehensive and GDPR compliant privacy policy.

Know Your Customer (KYC)

CHM utilises Identity Verification platforms and tools (i.e. ShuftiPro) to maximise the effectiveness of their KYC policies and protocols. This is designed to authenticate players with a high degree of certainty, minimising the risk of money laundering, fraud, and underage players.

This includes washing player identities against all relevant databases, including but not limited to PEP, Sanctions, and AML / Fraud databases.

Anti-Money Laundering (AML) and Counter Terrorism Financing (CTF)

CHM have documented AML / CTF measures in place to identify, mitigate and manage money laundering and terrorism financing risks associated with online transactions. CHM will employ advanced technology, analytics and reporting to identify and act on potential suspicious activity and transactions.

Responsible Gambling

CHM is fully committed to upholding responsible gambling practices. Measures that are and will be implemented to encourage responsible gambling will include, but not be limited to the following:

CHM's platform allows customers to self-exclude from betting for a period of time (or permanently), and also facilitates self-imposed gambling limits to hard-limit customer spending to predefined amounts. These can be set up on a daily, weekly and / or monthly basis.

Meaningful and accurate information relating to the odds of winning and major prizes is available, as well as game rules and information on how prizes will be awarded.

All new personnel will be trained on CHM's responsible gambling practices, including training that will allow them to identify and respond to "red flag" behaviours. Responsible gambling training will be completed at the commencement of their employment. Ongoing training will be provided in the form of a refresher course at least once each year.

CHM will utilise extensive data mining capabilities and experience to assist in programmatically identifying potential problem gamblers, to address any issues immediately.

CHM will maintain records of all assistance taken by staff for responsible gambling issues as, well as a full history of every customer's purchase history as part of their Responsible Gambling practices.

Risk Management / Internal Control Systems

CHM has developed a comprehensive “Risk Management Framework and Internal Control Systems” Document. This document is over 25 pages in length and rather than incorporate it into this document, it is provided as an appendix at the end of this business plan.

This document can be accessed by clicking this internal document link and it is suggested reading, before continuing with the remainder of the business plan - **[Risk Management Framework / Internal Control Systems Overview](#)**.

Financial Projections

The following are the 3-year financial projections for Clubhouse Media.

Clubhouse Media N.V.			
Financial Projections (2024 - 2026)			
	2024	2025	2026
Income			
- Sales	€5,000,000	€10,000,000	€15,000,000
- Customer Payouts	-€250,000	-€500,000	-€750,000
Total Income	€4,750,000	€9,500,000	€14,250,000
Coast of Sales			
- Product Costs (Games)	€2,000,000	€4,000,000	€6,000,000
- Payment Provider Fees	€375,000	€750,000	€1,125,000
- Hosting Fees	€250,000	€500,000	€750,000
- Marketing Costs	€1,500,000	€2,500,000	€3,000,000
Total Cost of Sales	€4,125,000	€7,750,000	€10,875,000
Gross Profit	€625,000	€1,750,000	€3,375,000
Gross Profit %	12.50%	17.50%	22.50%
Expenses			
- Accounting / Bookkeeping	€3,000	€5,000	€10,000
- Bank Charges	€5,000	€10,000	€15,000
- Compliance Expenses	€5,000	€10,000	€15,000
- Corporate Expenses	€10,000	€15,000	€20,000
- Curacao Licence Fees	€60,000	€60,000	€60,000
- Heat, Light, and Power	€2,400	€4,800	€7,200
- Insurance	€2,000	€4,000	€6,000
- Internet	€2,400	€3,600	€4,800
- Licence Fees	€142,500	€285,000	€427,500
- Office Lease	€12,000	€15,000	€20,000
- Wages	€75,000	€100,000	€125,000
- Professional Services	€10,000	€20,000	€30,000
- Service Provider Fees	€250,000	€500,000	€750,000
- Staff Amenities	€2,000	€4,000	€6,000
- Tech / MarTech Expenses	€12,000	€24,000	€30,000
- Telephones	€1,000	€1,500	€2,000
- Travel / Conferences	€5,000	€10,000	€20,000
Total Expenses	€599,300	€1,071,900	€1,548,500
Net Profit	€25,700	€678,100	€1,826,500
Net Profit %	0.54%	7.14%	12.82%

Financial – Supporting Notes

For a limited period of time, and under a formal agreement, Virid Pty Ltd is providing start-up funding to CHM. CHM intends to move quickly to being cashflow positive, so external funding is no longer required.

CHM's long-term goal is to build a sustainable, profitable, and socially responsible business.

CHM's long-term success is measured across using a number of factors that includes profitability, risk & compliance management, and a happy customer base.

Conclusion

Positioned with the Right Plan to Become an Industry Leader

CHM have and will continue to develop a world-class combination of knowledge, experience, people, partners, and tools. Albeit small, collectively CHM's team has more than two decades of proven international lottery and gaming experience. CHM has a firm plan to scale the business, along with the necessary supporting resources and processes to ensure the smooth, controlled, risk and compliance driven growth of the business.

This will place CHM in a highly favourable position to take advantage of the real opportunities in the online lottery and gaming sector, with a sophisticated product offering, underpinned with proven management and operational experience.

Cutting-edge marketing tactics, supported by world-class reporting and analytics will ensure CHM meets their targets to acquire and retain customers and to maximise profitability, but all in a socially responsible manner. CHM aims to delight customers through their user experience by providing a fun, easy-to-use and enjoyable platform to bet on the outcome of lottery games, with unique offerings and features.

All this coupled with comprehensive support through CHM's excellent customer service practices will mean that customers are provided with a highly engaging and enjoyable experience.

CLUBHOUSE MEDIA N.V.

Risk Management Framework / Internal Control Systems

Table of Contents

Overview.....	1
Risk & Compliance: Three-Dimensional Approach.....	3
1: Technology	6
2: Internal Control Systems	8
3: Resources	9
Risk / Compliance – Key Functional Areas	10
1: GEN-RM: General Risk Management	11
General Risk Management.....	11
Internal Controls System Management	11
Policy Management.....	11
Risk and Compliance Training.....	12
Modelling / Analysis / Reporting	12
Industry Associations / Publications	12
2: OPS-RM: Operations Risk Management	15
General Operations	15
Customer Management.....	15
Operations Reporting	15
Training – General Operations	15
Training – Risk / Compliance Operations	15
3: PAY-RM: Payments Risk Management	17
Payments Management / Control Systems	17
Payments Analytics / Monitoring / Reporting.....	17
Payment Provider Management	17
4: PROD-RM: Product Risk Management.....	19
Product Management / Onboarding	19
Live Product Mechanisms / Processes	19
Product Provider Management.....	19
5: MAR-RM: Marketing Risk Management.....	21
Marketing Management	21
Acquisition Marketing.....	21
Retention Marketing	21
Marketing / Advertising Standards and Guidelines	21
6: WIN-RM: Winners Risk Management.....	23
Winners Payment Risk Mechanisms.....	23
Risk vs. Margin Management.....	23
Winners Risk Provider Management	23
7: TECH-RM: Technical Risk Management.....	25

Network / Systems Administration	25
Support	25
Platform Based Controls.....	25
Internal Control Systems	25
8: CORP-RM: Corporate Risk Management	27
Corporate Governance	27
Licensing Governance	27
Finance	27

Overview

Structured and Proactive Risk Management Across All Areas of the Business:

Risk management is a core focus of the Clubhouse Media N.V. (CHM) business. CHM understands the critical importance of effective risk management strategies and execution, to proactively and effectively support a regulated gaming business.

CHM's risk management approach is comprehensive and has touchpoints across all facets of the business. This document serves to provide an overview of how CHM intends to manage risk and compliance across the entirety of its business activities. It will provide a high-level visual depiction of this framework, and as well as a more detailed narration of the key risk and compliance management functions performed:

At its core, CHM has identified and documented the following risk / compliance functional areas of the business:

1. **GEN-RM:** General Risk Management
2. **OPS-RM:** Operations Risk Management
3. **PAY-RM:** Payments Risk Management
4. **PROD-RM:** Product Risk Management
5. **MAR-RM:** Marketing Risk Management
6. **WIN-RM:** Winners Risk Management
7. **TECH-RM:** Technical Risk Management
8. **CORP-RM:** Corporate Risk Management

CHM will tackle the managing of these risk and compliance functional areas from the following perspectives / dimensions:

1. Technology.
2. Internal Control Systems.
3. Resources (internal and external).

Combining this three-dimensional approach with the eight risk and compliance functional areas listed above will provide the multi-faceted and comprehensive framework required for CHM to effectively and proactively manage the myriad of risk and compliance considerations for the business.

This meticulously designed framework and approach has been developed by highly experienced internal personnel and external resources, who have decades of experience working in (and on) Tier One licensing jurisdictions. This approach combines custom built technology, best-in-class third-party platforms, detailed internal controls systems, and extremely knowledgeable and experienced internal and external resources.

CHM's intension is to build a reputable, highly regulated, long-term business. This approach provides a holistic risk and compliance-based methodology that is designed to underpin the business as it grows and scales. A key premise of this overall approach is positioning CHM as heavily self-regulated business that is taking a Tier One Gaming Licence approach that far exceeds the requirements of its current gaming licence.

The overall risk / compliance framework is designed to proactively minimise known risks and identify unknown risks to the business as early as possible. There is a purposeful overlap between the various risk and compliance areas to provide layered redundancy and contingencies for all eventualities. CHM's distributed team will allow it to effectively manage risk and compliance across the depth and breadth of the business. The CHM risk management personnel will be structured to operate in a

supportive but independent manner to other business units. Risk management resources are and will be engaged to oversee and manage the risk mitigation strategies of the business, to ensure that all key risks are identified and managed. Both risk management and quantitative analysis specialists will provide risk assessment services across all spheres of the CHM business.

CHM is still considered a start-up so the underlying framework and systems will continue to be developed, and the size of the risk / compliance team will grow in line with the growth and needs of the business.

CHM is happy to discuss and consider any additional risk / compliance structures that key third parties may require.

Risk & Compliance: Three-Dimensional Approach

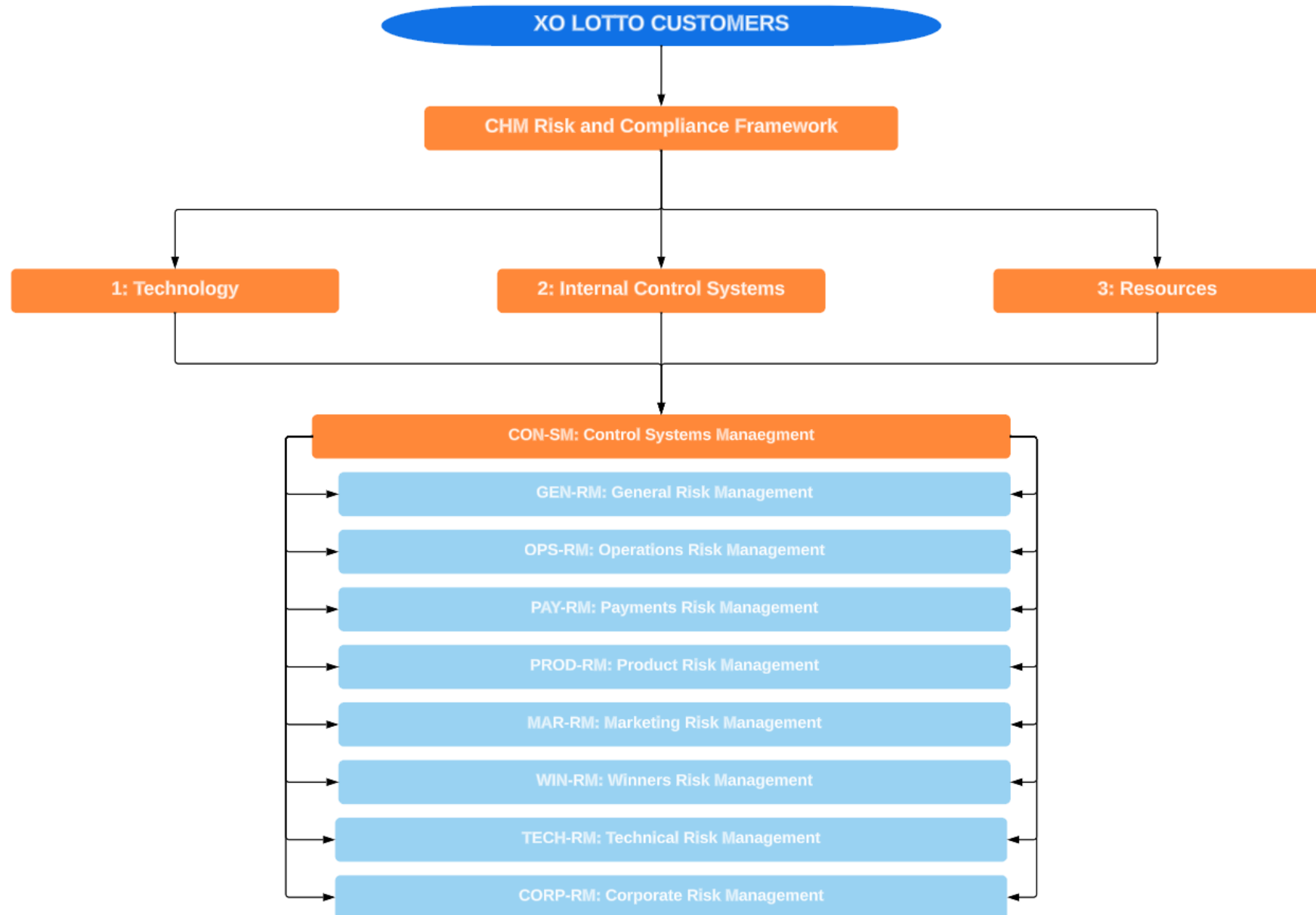
CHM will tackle the managing of these risk and compliance functional areas from the following three perspectives / dimensions:

1. Technology.
2. Internal Control Systems.
3. Resources (internal and external).

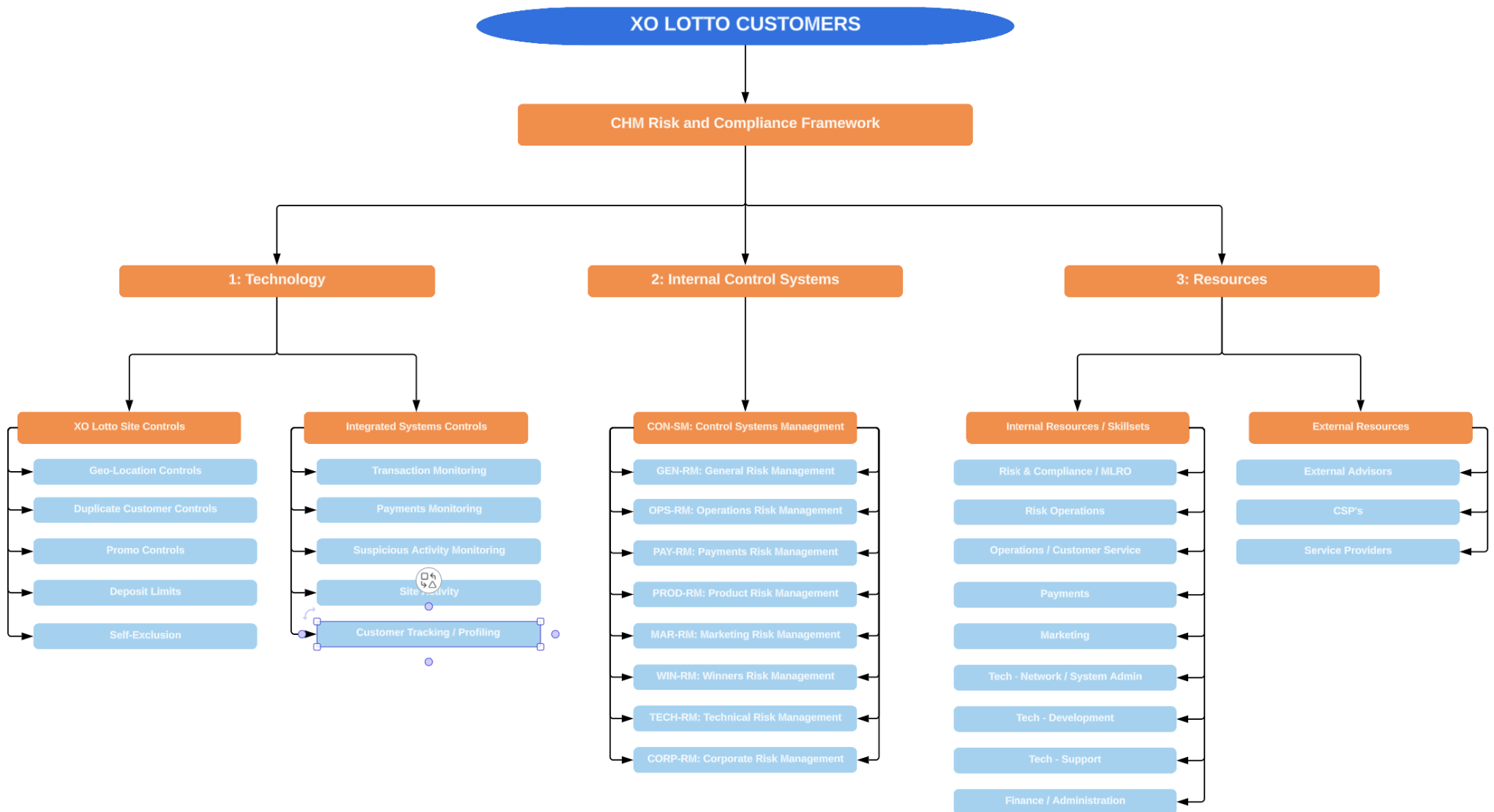
Combining this three-dimensional approach with the eight risk and compliance functional areas will provide the multi-faceted and comprehensive framework required for CHM to effectively and proactively manage the myriad of risk and compliance considerations for the business.

The following diagrams provide a visual representation of this approach. The first diagram showing a simplified view of this three-dimensional approach to the eight risk and compliance functional areas. The second diagram blends in a more detailed depiction of this approach, showing some of the individual considerations for each of the three dimensions, all in the context of managing the eight identified risk and compliance functional areas.

CHM - Risk Management Framework

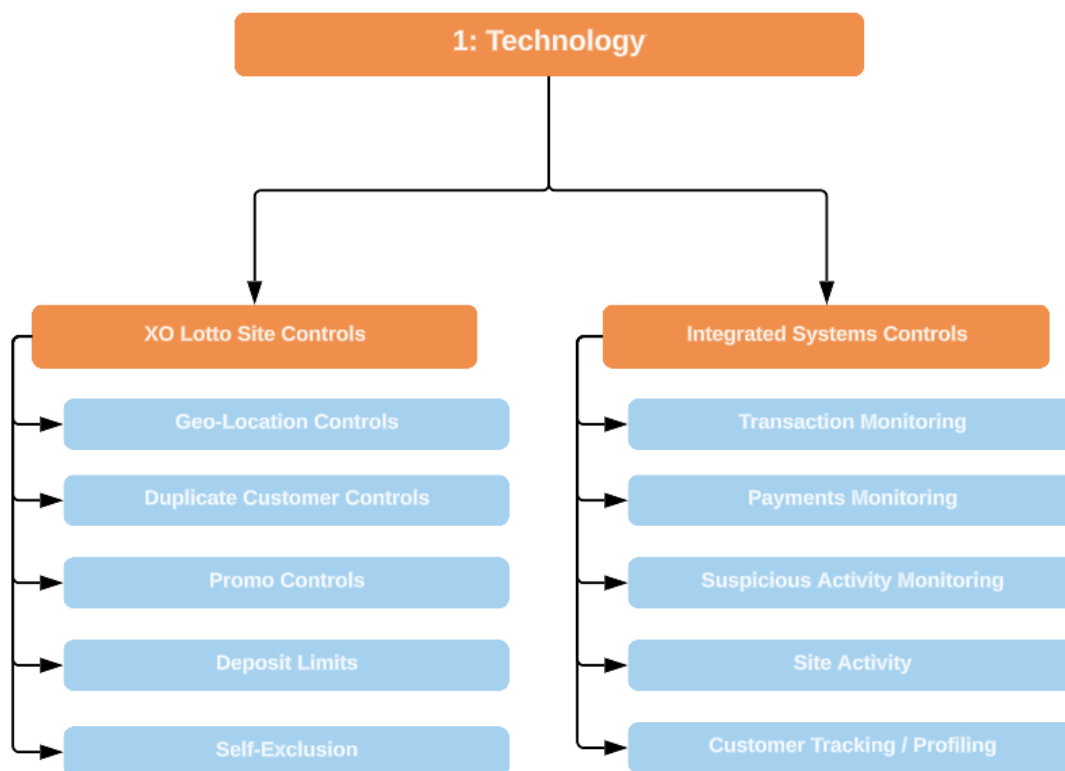


CHM - Risk and Compliance Management Framework



1: Technology

The proprietary CHM gaming platform has been developed from scratch and was designed with Tier One Gaming Licenses in mind. CHM's technology stack combines proprietary purpose-built custom software with highly integrated, best in breed third-party platforms, tools, and services, designed to provide the necessary foundation for the CHM business. The following diagram provides a summary visual depiction of some of the features provided by this technology stack.



Site Based Controls

The CHM proprietary platform has a suite of built in controls and checks, to help meet the needs, requirements, and necessary controls of the eight risk and compliance functional areas. The proprietary functionality includes (but is not limited to) the following controls, which are built into the foundation of the platform:

- Geo-location / Geo-Blocking.
 - Ensuring that only customers from pre-approved countries are able to register on the XO Lotto site.
 - By default, only approved countries are turned on, with all other countries geo-blocked and turned off.
- Duplicate Customer Controls.
 - Designed to curb fraudulent activities from registration.
 - Multiple technologies and matching criteria are used to minimise the chance customers can create more than one account.
- Promo Controls.
 - Designed to ensure all promotional activity, whether that be promo funds or games are accessed in a controlled and acceptable manner.
 - Designed to minimise the chance of fraudulent activity.
- Customer Configurable Responsible Gambling Controls.
 - Deposit Limits.

- Customer has the ability to set a maximum spending limit per period of time. i.e. \$10 per day.
- Self-Exclusion.
 - Customer has the ability to self-exclude for a temporary, or permanent period of time.

Integrated Systems Controls

In addition to the internal site-based controls, the CHM Tech Stack utilises a hand-picked and best-in-class tightly integrated suite of third-party platforms and tools to help meet the requirements of the eight internal risk and compliance functional areas. Significant research was undertaken to identify and select the suite of third-party systems required to effectively manage the CHM business. This includes but is not limited to the following:

- **Customer Service:** Zendesk
- **AML / CTF:** ShuftiPro / GB Group
- **CRM:** Optimove
- **Payments:** Rebilly
- **Analysis / Reporting:** Optimove / Rebilly / Google / Internal Reporting.

In addition to this, 40+ additional platforms / technologies are employed as part of the overall CHM Technology Stack. This combination of internal and third-party systems allows **complete** customer tracking and profiling, that includes but is not limited to the following:

- Transaction Monitoring.
- Payments Monitoring.
- Suspicious Activity Monitoring.
- Site Activity Monitoring.

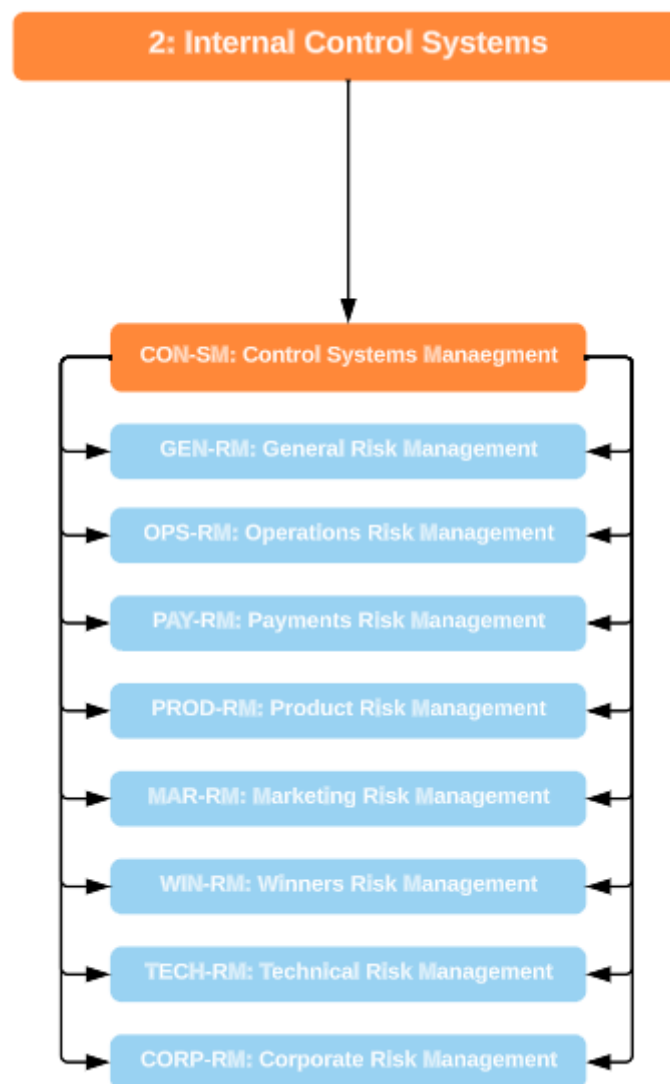
This comprehensive suite of internal and external platforms / technologies underpins the entire CHM business and provides an extremely solid foundation for the CHM business to be built upon.

2: Internal Control Systems

The CHM Internal Control System (CON-SM: Control Systems Management) is the overarching methodology and process that facilitates the effective management of the eight risk and compliance functional areas identified within the CHM business.

The Internal Control Systems bring together the CHM technology stack, resources, and eight risk and management functional areas. Providing the necessary structure and control to effectively manage risk and compliance management for the CHM business.

These Internal Control Systems combine the collective strength of the various technologies, resources, and risk management categories that are outlined in this document. In a manner that allows effective risk and compliance management associated with the business activities.



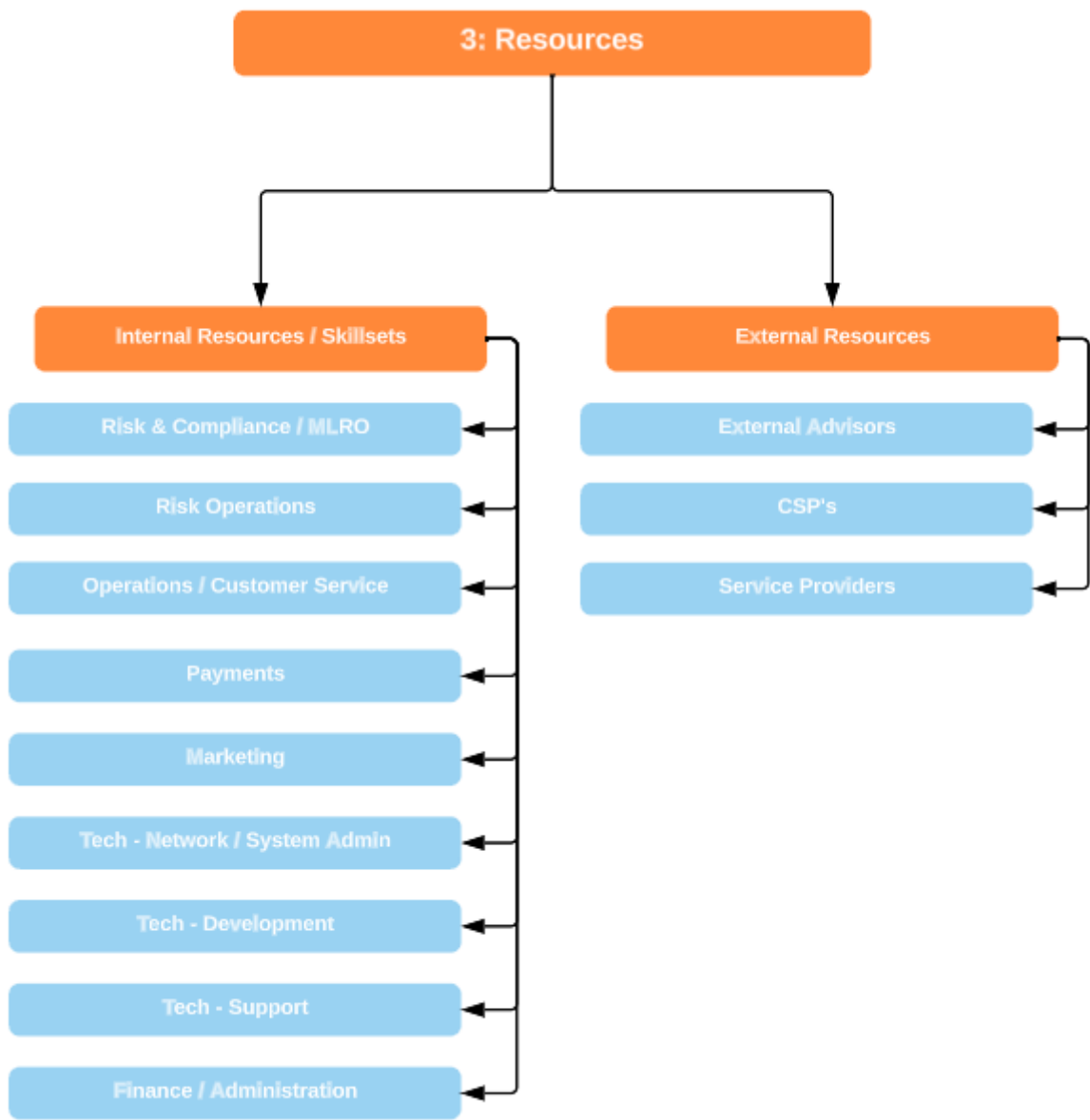
The CHM Internal Controls System is designed to manage all aspects of these eight risk and compliance functional areas, within the matrix of the three dimensions (technology, internal control, and resources). This includes lifecycle management and workflows.

The eight individual risk and compliance functional areas will be outlined further in this document.

3: Resources

CHM employs a blend of internal and external resources (people) designed to bring exceptional knowledge and experience to the CHM business, for effective management of all business activities. The CHM team includes resources from multiple locations around the world, most with heavy experience and knowledge working directly in and with Global Tier One Licensing jurisdictions.

With decades of gaming experience, the CHM internal and external resources provide broad coverage for all CHM critical operational, risk / compliance, and business activities. The diagram below illustrates some of the CHM internal and external resources and skillsets:



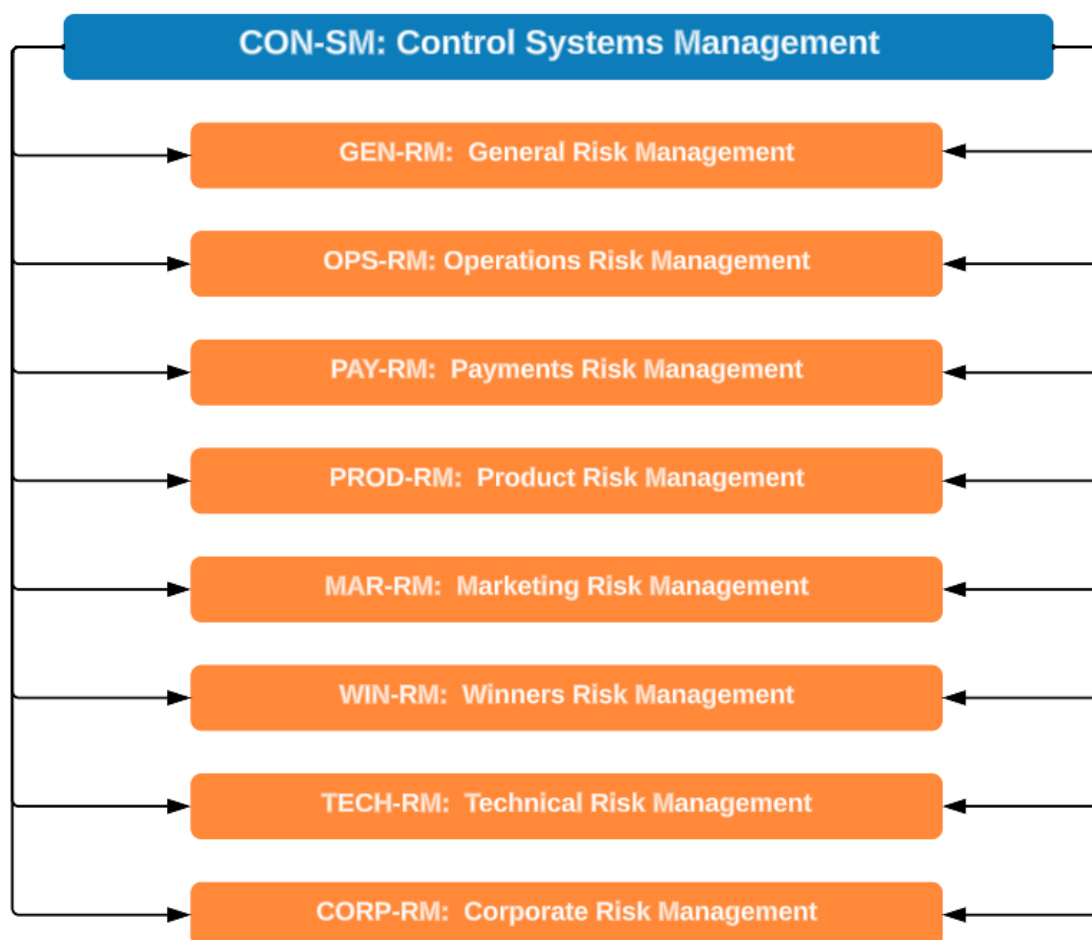
This geographically diverse resource pool provides many advantages, not the least of which 24/7 coverage for all key business activities.

Risk / Compliance – Key Functional Areas

CHM has defined and categorised the following eight key risk and compliance functional areas, all of which fall under the CON-SM (Controls Systems Management) framework. The following sections of this document will describe each functional area in greater detail.

CON-SM: Control Systems Management

Controls Systems Management (CON-SM) is the overarching principle and foundation by which all CHM risk and compliance management systems are managed and controlled.



1: GEN-RM: General Risk Management

CHM's GRM category covers a broad range of topics, related to the general management of risk and compliance related activities for the business:

General Risk Management

GRM is the umbrella term for the management of all risk and compliance related activities to the operation of the CHM business. This includes high-level risk and compliance and MLRO activities. Examples of this includes oversight, management, and actioning of activities related to the other seven risk and compliance key functional areas. It also includes tasks and considerations not specifically covered by the other seven risk and compliance functional areas.

Internal Controls System Management

This refers to the underlying mechanisms used to manage all of the risk and compliance documentation for the CHM business. This includes both the technologies and the workflow / processes such as periodic (scheduled) reviews, version control, and workflow approval processes.

Policy Management

CHM has a documented list of policies that require management, periodic review and updates. This includes the following:

CHM will work closely with all key service providers (i.e. legal advisors, risk, and payment providers) to ensure the latest methods and approaches to these policies are identified, discussed, and implemented, where appropriate and beneficial.

CHM will ensure that operational and customer service staff are trained in all aspects of the CHM Policies and Procedures. This will include initial and on-going training for all personnel involved, ensuring on-going compliance to these policies.

The following is a brief overview of the key CHM policies.

- Terms and Conditions.
- Privacy Policy.
- AML / CTF Policy.
- Responsible Gambling.

Terms and Conditions

Based on decades of Lottery and Gaming experience CHM has created an extensive and comprehensive set of Terms and Conditions for the operation of the business. CHM will continually monitor, review, and amend the Terms and Conditions as necessary.

Privacy Policy

CHM has engaged the services of dedicated privacy experts and lawyers to craft a comprehensive and GDPR compliant privacy policy.

Know Your Customer (KYC)

CHM utilises Identity Verification platforms and tools (i.e. ShuftiPro) to maximise the effectiveness of their KYC policies and protocols. This is designed to authenticate players with a high degree of certainty, minimising the risk of money laundering, fraud, and underage players.

This includes washing player identities against all relevant databases, including but not limited to PEP, Sanctions, and AML / Fraud databases.

Anti-Money Laundering (AML) and Counter Terrorism Financing (CTF)

CHM have documented AML / CTF measures in place to identify, mitigate and manage money laundering and terrorism financing risks associated with online transactions. CHM will employ advanced technology, analytics and reporting to identify and act on potential suspicious activity and transactions.

Responsible Gambling

CHM is fully committed to upholding responsible gambling practices. Measures that are and will be implemented to encourage responsible gambling will include, but not be limited to the following:

CHM's platform allows customers to self-exclude from betting for a period of time (or permanently), and also facilitates self-imposed gambling limits to hard-limit customer spending to predefined amounts. These can be set up on a daily, weekly and / or monthly basis.

Meaningful and accurate information relating to the odds of winning and major prizes is available, as well as game rules and information on how prizes will be awarded.

All new personnel will be trained on CHM's responsible gambling practices, including training that will allow them to identify and respond to "red flag" behaviours. Responsible gambling training will be completed at the commencement of their employment. Ongoing training will be provided in the form of a refresher course at least once each year.

CHM will utilise extensive data mining capabilities and experience to assist in programmatically identifying potential problem gamblers, to address any issues immediately.

CHM will maintain records of all assistance taken by staff for responsible gambling issues as, well as a full history of every customer's purchase history as part of their Responsible Gambling practices.

Risk and Compliance Training

Risk and compliance training is required for various levels of the CHM business. The CHM Risk team will be responsible for the creation, maintenance, and delivery of said training. This also includes external / additional training for senior risk and compliance resources, such as the MLRO.

Modelling / Analysis / Reporting

It is envisaged that all risk resources will have modelling, analysis, and reporting knowledge and skillsets. It is expected that all CHM business units will have access to the modelling expertise of the risk management team. In addition to this, risk resources will conduct modelling, analysis, and reporting to support the various risk and compliance activities.

Industry Associations / Publications

CHM does and will continue to stay abreast of global / gaming developments. In addition to training, it is expected that CHM resources will have access to various / select industry associations and publications.

The following screenshot is an excerpt from the CHM Internal Controls Register for GEN-RM (General Risk Management) ...

1: GEN-RM (General Risk Management)	Notes / Questions
- General Risk / Compliance Management	
- General Risk and Compliance Management	General management and oversight of risk and compliance activities.
- Risk and Compliance Monitoring / Oversight	Management and oversight of risk and compliance framework / programs. Internal audits.
- Internal Control Systems Management	
- Control Systems Register	Management of the Master Control Systems Register.
- Workflow Management (for controls systems and related doco)	Creation, definition, management, and education of workflow processes (drafting, approval, signing, scheduled reviews etc)
- RegTech Platforms / Management	Selection, configuration, and management of regtech platforms. Internal and external regtech. i.e. site, cms, ShuftiPro etc.
- Policy Management	
- Policy Management	Scheduled periodic reviews / updates (internal and external). Workflow (drafting, approval, publishing). Updated training material and associated programs. Training sessions - for updates).
- Key Business Policies	i.e. Terms and conditions, privacy policy (GDPR), AML / CTF (and associated policies), responsible gambling.
- Internal Policies	i.e. Withdrawal processing, responsible gambling, fx policy
- Internal Policies	
- Withdrawal Processing Policy	Policy covering the handling of customer withdrawal requests.
- Responsible Gambling	Policy covering CHM's responsible gambling practices and controls etc.
- FX Policy	Foreign exchange policy outlining approved fx activities, controls, and hard thresholds.
- Risk and Compliance Training	
- Internal Risk / Compliance Training	Creation / management / conducting of internal training material and sessions. Scheduled and ad-hoc training sessions.
- External Risk / Compliance Training	Training of risk and compliance resources / MLRO / senior management.
- Modelling / Analysis / Reporting	
- Risk Modelling / Analysis / Reporting	Creation of analysis of risk modelling. Risk modelling reporting.
- Financial Modelling	Creation of financial modelling for business.
- Management Reporting	Creation / preparation of risk / compliance management reporting.
- Industry Associations / Publications	
- Gaming	To keep informed / educated on relevant gaming related topics.
- Risk / Compliance	To keep informed / educated on relevant risk / compliance related topics.
- RegTech	To keep informed / educated on relevant regtech related topics.

2: OPS-RM: Operations Risk Management

OPS-RM covers the following primary areas:

General Operations

Risk and compliance oversight of general operational activities.

Customer Management

Risk and compliance oversight of all customer management activities, to ensure operational / customer processes are being followed. To include tasks such as review of suspicious transactions and customer activity, general issue escalation processes, review and final approval of withdrawal requests etc.

Operations Reporting

Provision of reporting services and risk / compliance oversight of key operational activities. To include considerations such as the number and value of withdrawals processed, management reporting of suspicious transactions and customer activity.

Training – General Operations

Creation of training materials, and as required delivery of said training materials. This includes periodic reviewing and updating of training materials, as and when required.

Training – Risk / Compliance Operations

To cover the specific training requirements for risk and compliance operations staff. Including the periodic reviewing and updating of training materials, as and when required.

The following screenshot is an excerpt from the CHM Internal Controls Register for OPS-RM (Operations Risk Management) ...

2: OPS-RM (Operations Risk Management)	Notes / Questions
- General Operations	
- General Operational Processes	Policy, Process, Tech for identified operational processes.
- Customer Management	
- Full Customer History	Policy / Process / Tech - comprehensive activity tracking (transactions, bets, wins, withdrawals etc). Full customer correspondence and internal notes history.
- Customer Service	Zendesk - customer queries / correspondence handling.
- Customer Complaints	Customer complaints handling processes. Escalation processes based on type and severity of customer complaint.
- Customer KYC / AML	Policy / Process / Tech - customer KYC / AML checks (standard and EDD).
- Customer Winnings	Policy / Process / Tech - high-win segregation / review / processing, external insurance claim processes.
- Customer Withdrawals	Policy / Process / Tech - customer withdrawal requests - review / approval / processing.
- Customer Fraud	Geo-blocking, duplicate customers, promo abuse / controls, suspicious activity, suspension etc. Internal escalation processes for review. i.e. escalation to MLRO.
- Responsible Gambling	Policy / Process / Tech - site based controls (self-exclusion, deposit limits), customer monitoring and review etc.
- Operations Reporting	
- Customer Service Responses	Ensuring customer service responses are handled quickly and satisfactorily, including customer complaint management.
- KYC / AML	To ensure KYC / AML policies, guidelines, and processes are followed.
- High-Win Processing	Ensuring that high-wins are reviewed / approved appropriately and as per policies and guidelines.
- Withdrawals Processing	Withdrawal processing oversight, ensuring withdrawals are being processed as per policy (multi-step approvals, quick turnaround etc).
- Suspicious Activity Handling	Policy / Process / Tech - ensuring suspicious activities are identified, reviewed, and reported if required.
- Training - General Operations	
- Internal Platforms / Systems	Policies - KYC / AML, Terms etc. Processes - Withdrawals Processing. Tech - Internal Tech (XO Site, CMS etc), Third-Party (Zendesk, Rebilly etc), Other??
- External Platforms / Systems	Key third-party platforms, and external operational training as determined and required.
- Training - Risk / Compliance Operations	
- Internal Risk / Compliance Operations	Policy, Process, Tech. i.e. KYC / AML, Withdrawals Processing etc, etc.
- External Platforms / Systems / Partners	Key third-party platforms, and external operational training as determined and required.

3: PAY-RM: Payments Risk Management

PAY-RM covers the full spectrum of Payments Risk Management for the CHM business. CHM uses a third-party / centralised payments platform called Rebillly (<https://rebillly.com>).

Utilising a third-party payment platform such as Rebillly ensures that CHM has access to cutting edge payment management tools and controls. Rebillly is continually developing and improving their payments platform functionality. This removes the need for CHM to do so and enables CHM to use a world-class payments platform, that is in a continual phase of development and improvement by payments domain specific professionals.

Payments Management / Control Systems

This covers the overall configuration of the Rebillly platform for CHM's business, including the setup and configuration of all gateway accounts (individual payment providers), payment provider business rules, limitations, and controls. This extends to the creation of the gateway routing setup and configuration.

Payments Analytics / Monitoring / Reporting

Rebillly provides rich functionality to manage and monitor the CHM payments ecosystem. Both automated and manual functionality is available that enables a range of fraud controls. Triggered based rules can be used to identify suspicious transactions and customer activity, that can result in the automated movement of problematic transactions and customers to temporary or permanent blacklists. A full suite of reports is available to provide CHM with summarised or detailed view of all payment activity.

Payment Provider Management

This covers the provision of risk and compliance services to ensure CHM effectively manages the compliance requirements of the various payment providers.

The following screenshot is an excerpt from the CHM Internal Controls Register for PAY-RM (Payments Risk Management) ...

3: PAY-RM (Payments Risk Management)	Notes / Questions
- Payments Management / Control Systems	
- Gateway Rules, Individual Gateway (PSP's) Config	Individual PSP setup and configuration (approved countries, payment methods. Processing rules / limits etc). Gateway routing configuration / rules.
- High Level Controls / Rules / Blacklists	Policy, Process, Tech - Individual PSP limits, velocity controls, customer controls, blacklist rules etc.
- Risk Rules / Controls	Automated risk scoring and thresholds.
- Payments Analytics / Monitoring / Reporting	
- Automated Monitoring and Controls	Suspicious activity / transactions. Responsible gambling.
- Manual Monitoring / Review	Suspicious activity / transactions. Responsible gambling.
- Payment Provider Management	
- Payment Provider Risk / Compliance Requirements	Based on individual payment provider requirements - ensure provider requirements are met.

4: PROD-RM: Product Risk Management

PROD-RM covers the following primary areas:

Product Management / Onboarding

This includes the researching and proposal of games that meet both the product / marketing requirements of the business, whilst ensuring that pre-determined risk tolerance thresholds are respected.

CHM has an established set of risk exposure parameters and limits. Examples of this would be maximum payout thresholds for scratch card games.

Live Product Mechanisms / Processes

CHM offers the following product (game) categories on the XO Lotto site:

- Lottery.
- Keno.
- Casino.

Various automated technical mechanisms are employed by the CHM proprietary platform to manage gameplay across these three categories. Risk and compliance oversight is required to ensure these platform mechanisms always perform as expected, and that any exceptions are identified, notified, and managed.

Product Provider Management

This covers the provision of risk and compliance services to ensure CHM effectively manages the compliance requirements of the various product providers.

The following screenshot is an excerpt from the CHM Internal Controls Register for PROD-RM (Product Risk Management) ...

4: PROD-RM (Product Risk Management)	Notes / Questions
- Product Management / Onboarding	
- Game Management	Existing / Live Games - game changes, game issues etc.
- New Game Research / Review	Policy, Proces, Tech - risk tolerances (i.e. max payout thresholds), game onboarding etc.
- Live Product Mechanisms / Processes	
- Lottery	
- Bet Lodgement and Coverage Mechanisms / Controls (i.e. EMIRAT, Ltech)	Ensuring these are working, and that exception handling is in place / working.
- Bet Coverage Costs	Ensuring these are correct.
- High Win Segregation / Functionality	Ensuring this is working.
- Keno	
- Bet Coverage Mechanisms / Controls (RNG)	RNG based. Ensuring these are working, and that exception handling is in place / working.
- Bet Coverage Costs	Ensuring these are correct.
- High Win Segregation / Functionality	Ensuring this is working.
- Casino	
- Game Play Mechanisms, Bet Lodgement Coverage / Controls	Ensuring these are working, and that exception handling is in place / working.
- Bet Coverage Costs	Ensuring these are correct.
- Product Provider Management	
- Product Provider Risk / Compliance Requirements	Business rules, restrictions, approved activities. Annual compliance checks etc.

5: MAR-RM: Marketing Risk Management

MAR-RM covers the following primary areas:

Marketing Management

This includes brand design and associated controls, and extends to processes and controls required to manage any promotional activities utilised by the CHM business.

Acquisition Marketing

Covers and includes any acquisition marketing controls and guidelines, whether they be internally driven, or externally required. It also extends to concepts such as affiliate management and controls, and acquisition marketing workflow management.

Retention Marketing

Includes the approved retention marketing channels and activities, as well as all retention marketing workflows. i.e. marketing material approval workflows.

Marketing / Advertising Standards and Guidelines

Processes and controls required to ensure CHM meets all marketing / advertising guidelines, standards, and requirements. Includes access to industry associations and periodicals to keep abreast of industry developments.

The following screenshot is an excerpt from the CHM Internal Controls Register for MAR-RM (Marketing Risk Management) ...

5: MAR-RM (Marketing Risk Management)	Notes / Questions
- Marketing Management	
- Brand / Design	Brand book / brand and design guidelines and controls.
- Promotional Activities	Policy, Process, Tech. Promo restrictions - promo cash, free games etc.
- Acquisition Marketing	
- Acquisition Marketing / Advertising / Affiliates Controls	Acquisition advertising guidelines and controls. Affiliates guidelines and controls (i.e. can only use approved resources etc).
- Acquisition Marketing Workflows	Workflows - draft, review, approvals etc
- Retention Marketing	
- Retention Marketing Activities / Controls	Retention marketing guidelines / controls. Approved channels and activities.
- Retention Marketing Workflows	Workflows - draft, review, approvals etc
- Marketing / Advertising Standards and Guidelines	
- Marketing / Advertising Controls	As required, access to advisors who specialise in marketing and advertising standards.
- Industry Associations / Periodicals	Joining / subscribing to industry associations and periodicals. Active monitoring of both.

6: WIN-RM: Winners Risk Management

WIN-RM covers the following primary areas:

Winners Payment Risk Mechanisms

CHM employs multiple methods to manage the risk associated with customer winnings. The methods used are driven by the following key considerations.

1. Risk Coverage.
2. Margin Maximisation.

The number one goal is to ensure that CHM has external coverage (where required) for all potential winning amounts over a pre-set internal threshold.

Various methods are utilised. For lottery CHM utilises external insurance and ticket providers to cover the risk. For Keno, external insurance is used. It also includes pre-defined processes in the event a winner's claim is required from an external provider.

Risk vs. Margin Management

In some circumstances CHM has multiple methods concurrently available for risk coverage, and in those circumstances a decision based on maximising margins can be made.

Winners Risk Provider Management

This covers the provision of risk and compliance services to ensure CHM effectively manages the compliance requirements of the various winners' risk providers.

The following screenshot is an excerpt from the CHM Internal Controls Register for WIN-RM (Winners Risk Management) ...

6: WIN-RM (Winners Risk Management)	Notes / Questions
- Winners Payment Risk Mechanisms	
- Self-Insurance	Policy, Process, Tech - modelling / configuring / managing self-insurance thresholds.
- External Insurance	Policy, Process, Tech - funding accounts, cost oversight / management, winners claims / credits etc.
- Ticket Purchasing	Policy, Process, Tech - funding accounts, cost oversight / management, winners claims / credits etc.
- Risk vs. Margin Play Management	
- Winners Risk Management Coverage Decisions	Policy, Process, Tech - risk coverage modelling / decisions (self-insurance vs. external insurance vs. ticket purchasing).
- Winners Risk Provider Management	
- Winners Risk Provider Risk / Compliance Requirements	Based on individual provider requirements - ensure provider requirements are met.

7: TECH-RM: Technical Risk Management

TECH-RM covers the following primary areas:

Network / Systems Administration

CHM utilises centralised user and resource management, to control access to internal platforms as well as necessary third-party / external platforms. This includes the formal onboarding and exiting procedures to be followed to manage access to all internal and external systems.

This also includes site performance management, general web security, backup, restore, and business continuity practices and processes.

Support

CHM has access to multiple levels of support, both user and technical support. Due to the geographically diverse nature of the CHM team, these resources are typically available 24/7.

Platform Based Controls

The CHM proprietary platform has a suite of built in controls and checks, to help meet the needs, requirements, and necessary controls of the eight risk and compliance functional areas. Internal checks are periodically required to ensure this functionality is working as intended. And as the business scales and grows further controls will be identified, contemplated, and initiated as and when necessary.

Internal Control Systems

Internal Control Systems Documentation for technical considerations such as Network / System Administration.

The following screenshot is an excerpt from the CHM Internal Controls Register for TECH-RM (Technical Risk Management) ...

7: TECH-RM (Technical Risk Management)	Notes / Questions
- Network / Systems Administration	
- Resource Management	Onboarding / exiting, access to platforms / tools / resources etc.
- Internal / Third Party Platform Management and Controls	Installation, management, monitoring and controls oversight.
- Logins / Permissions Management	Centralised login / permissions policies and management.
- Software Development Management	Access to qa / live systems. Build deployment and QA etc. Policy, Process, Tech - Jira, Bitbucket, Confluence, Lucid Charts.
- Site Performance / Security Management	Ensure site performance is as per expectations, ensuring site security is appropriate and effective.
- Business Continuity	Backup / restore / disaster recovery / business continuity.
- Support	
- User Support	Multiple levels of user support are available to the CHM business.
- Technical Support	Multiple levels of technical support are available to the CHM business.
- Platform Based Controls	
- Geo-location Controls / Restrictions	Ensure ge-blocking is working as expected, and no customer registrations are possible from non-approved countries.
- Duplicate Customer Checks	Ensure platform based controls are working appropriately, to ensure no duplicate customer accounts can be created, but legitimate customers can still register (no false-positives).
- Responsible Gambling Controls (deposit limits, self-exclusion)	Customer set deposit limits, self-exclusion periods (temporary or permanent).
- Customer History	Full customer history - transactions, bets, payments, wins, withdrawals, customer notes and correspondence.
- Internal Control Systems	
- Network / System Administration	Documented systems, processes, and controls. Change control management.

8: CORP-RM: Corporate Risk Management

CORP-RM covers the following primary areas:

Corporate Governance

General corporate governance and oversight, ensuring corporate governance requirements are met.

Licensing Governance

General gaming license management, gaming license risk and compliance management, to ensure all gaming licence requirements are met.

Finance

Management of finance / accounting controls for the day-to-day finance and accounting activities. Also includes the development of formal FX policies and controls, as well as management and oversight of auditing requirements.

The following screenshot is an excerpt from the CHM Internal Controls Register for CORP-RM (Corporate Risk Management) ...

8: CORP-RM (Corporate Risk Management)	Notes / Questions
- Corporate Governance	
- General Corp Governance	General corp governance management and oversight.
- Licensing Governance	
- Gaming Licence Management	General license management / license risk and compliance management.
- Finance	
- General Accounts / Finance	Management of finance / accounting controls for day-to-day-activities.
- Audits	Management / facilitation of audit requirements.
- Foreign Exchange (FX)	Management of FX risk, monthly FX programs and activities.