

Arena Sports Entertainment N.V - OPERATIONAL MANUAL

1. Policy Statement Overview

Arena Sports Entertainment N.V is committed to conducting its business in a lawful and ethical manner, managed within a clearly define set of operational rules and policies in accordance with the requirements of the National Ordinance for Games of Chance (LOK) and the Curaçao Gaming Authority (CGA).

2. Purpose

This Operational Manual has been prepared by Arena Sports Entertainment N.V. in accordance with Article 5.9 of the National Ordinance for Games of Chance (LOK) and the requirements of the Curaçao Gaming Authority (CGA).

The purpose of this Operational Manual is to:

- Set out the responsibilities, and internal and legal obligations of Arena Sports Entertainment N.V.
- Provide information and guidance to employees and customers as to how Arena Sports Entertainment N.V. manages every aspect of their business.
- To provide reference to the correct company policy for all operational tasks.

3. Company Information

Legal name of the Licensee (as registered with the Curaçao Chamber of Commerce).	Arena Sports Entertainment N.V
Registered business address.	Seru Loraweg 17C Willemstad Curaçao
Chamber of Commerce registration number.	137157
License number and issue date	License Number - OGL/2024/833/1005 Issued- 23 rd May 2025
Business Activity	Online Gaming Operations
Jurisdiction	Curaçao

4. Organisational Structure

The company maintains departments for all relevant aspects of the business, managed via Board Oversight

Departments include but are not limited to:

- Compliance
- MLRO
- Operations
- IT
- Security

5. Operational Activities

Arena Sports Entertainment N.V is an online gaming organization.

As such our operational activities include but are not limited to:

- Sportsbook
- Casino gaming
- Customer account management
- Payment processing
- Fraud monitoring, compliance supervision and adherence to all other legal and moral responsibilities as described in our policies.

6. Player Registration and Account Management

All players must complete registration and identity verification procedures before gaming activities are permitted.

For full details please refer to Arena Sports Entertainment N.V's Terms and Conditions.

7. Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF)

Arena Sports Entertainment N.V is committed to conducting its business in a lawful and ethical manner.

Arena Sports Entertainment N.V takes a zero-tolerance approach to money laundering and funding of terrorism and is committed to upholding all laws relevant to anti-money laundering and counter-terrorist financing in all the jurisdictions in which they operates.

Arena Sports Entertainment N.V's AML/CTF Programme is shaped by current applicable legislation, regulations and best-practice anti-money laundering standards and has been

tailored to effectively manage and mitigate the ML and FT risks the organization is exposed to. It includes establishing Board-approved policies, appropriate procedures and implementing and enforcing effective systems and controls. Some examples of these systems and controls include:

- Customer due diligence
- Suspicious activity monitoring
- enhanced due diligence for high-risk customers.

For full details please refer to Arena Sports Entertainment N.V's Anti-Money Laundering Policy.

8. Payment Processing Procedures

Players are able to deposit and withdraw funds via cash only at the appointed Arena Sports Entertainment N.V locations.

Players are expected to present photographic ID for the withdrawal of any amount of funds.

9. Responsible Gambling

Arena Sports Entertainment N.V is committed to ensuring all players experience a safe and supportive gambling environment.

We provide a variety of support mechanisms for those players who require it. These mechanisms include:

- Deposit limits
- Self-exclusion tools
- Responsible gambling support signposting.

For full details please refer to Arena Sports Entertainment N.V's Responsible Gambling Policy

10. Fraud Prevention

Criminal activity can include any kind of conduct that would be a criminal offence in the countries in which Arena Sports Entertainment N.V operate, including fraud.

We reserve the right to refuse, restrict, cancel or limit any wager at any time for whatever reason, including any bet perceived to be placed in a fraudulent manner in order to circumvent our betting limits and/ or our system regulations and we employ a

variety of monitoring tools and controls for detecting and preventing collusion and unfair/ fraudulent play.

For further details on how Arena Sports Entertainment N.V actively prevents fraud, please refer to Arena Sports Entertainment N.V's Terms and Conditions and Anti-Money Laundering Policy.

11. Data Protection and Confidentiality

Arena Sports Entertainment N.V is committed to protecting our player's privacy and developing technology to provide the most powerful and safe online experience.

Arena Sports Entertainment N.V's Information Security Policy establishes the principles, controls, and responsibilities necessary to protect information assets, customer data, and gaming operations in compliance with Curaçao's *LOK* regulatory framework. It ensures confidentiality, integrity, and availability of data while supporting responsible gaming and regulatory transparency.

This policy works alongside the Know Your Customer Policy, in which the company ensures that we comply within the licenses regulatory framework, prevents identity fraud, supports responsible gambling, and meets Anti-money Laundering (AML) and Counter-Terrorism Financing (CTF) obligations.

Please also refer to the company's Terms and Conditions, Privacy Policy and Anti-Money Laundering Policy.

12. IT Systems and Cybersecurity

The company maintains cybersecurity controls, monitoring systems, backups, and disaster recovery procedures.

Please also refer to the company's Terms and Conditions and Information Security Policy.

13. Complaint Handling Procedures

Arena Sports Entertainment N.V's Complaints Policy outlines the framework for managing player complaints and disputes, ensuring transparent, fair, and efficient process in alignment with the requirements under Article 5.3 of the National Ordinance on Games of Chance (Landsverordening op de kansspelen, "LOK").

The Complaints Policy guarantees players access to a straightforward and effective complaint and dispute resolution process,

Please refer to the company's Player's Complaint Policy.

14. Internal Controls and Governance

Arena Sports Entertainment N.V.'s applies internal controls including audit trails, segregation of duties, compliance reviews, and risk monitoring.

15. Staff Training

As part of the Arena Sports Entertainment N.V.'s commitment to ensuring full legal compliance and adherence to all legislation, staff receive regular training to ensure their understanding and delivery of all our policies. This training ensures

Employees receive regular training in line with our policies, with regards to the following subjects:

- AML/CFT
- Responsible Gambling
- Fraud Prevention
- Regulatory obligations
- Know Your Customer

16. Outsourcing and Third-Party Management

Arena Sports Entertainment N.V. exercises strict oversight when outsourcing services or engaging third-party providers. Any outsourcing arrangement - whether for payment processing, customer support, game development, or IT infrastructure – is governed by formal contracts that clearly define responsibilities, compliance obligations, and data protection standards.

Arena Sports Entertainment N.V. ensures actions of our third parties adhere to Curaçao's licensing requirements, including AML/KYC procedures, responsible gaming safeguards, and technical integrity standards.

Outsourcing cannot be used to circumvent regulatory obligations.

17. Reporting Obligations

Under the Curaçao Gaming Authority's regulatory framework, Arena Sports Entertainment N.V.'s follows strict reporting obligations designed to uphold transparency and protect players.

As per requirements, we will submit compliance reports covering financial transactions, player account activity, responsible gaming measures, and anti-money laundering (AML) controls. Any suspicious transactions or unusual betting patterns will also be reported immediately to the regulator in line with international AML standards.

The MLRO and Compliance Department are responsible for ensuring the completion and submission of all reporting.

18. Record Retention

Under the Curaçao Gaming Authority's framework Arena Sports Entertainment N.V's are required to maintain robust record retention policies to ensure transparency, accountability, and regulatory compliance. Arena Sports Entertainment N.V's securely stores all player account records, financial transactions, game logs, and compliance reports for a minimum of five years. The records are readily accessible for inspection by the regulator and include details of deposits, withdrawals, wagers, winnings, and any incidents of fraud or technical failure.

Retention policies also extend to Anti Money laundering and Know Your Customer documentation, requiring Arena Sports Entertainment N.V's to preserve identity verification data and risk assessments in line with international standards.

Records are kept in a manner that protects player privacy while allowing regulators to audit for fairness, responsible gaming, and anti-money laundering compliance.

19. Review

Arena Sports Entertainment N.V's will occasionally update this Operational Manual on an ad-hoc basis to reflect changes in our procedures, process and policies.

Annual review

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Managing Director

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