

		Location	Checked	Instructions	Comments
cs	Corporate Structure				
1.	Start up / New company	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao.</i>	No 10.7.2012 Updated 4.3.2013
	Existing operating company holding sub license	BP/Internet/ Application Part 7	Y	<i>Check whether the company is live under Curacao. If you notice that the company is Tier 1 (known) company please make a note.</i>	Cyberluck 1 domain removed on 27.6.2025

		Location	Checked	Instructions	Comments
	GoAML				Q10 BCIF: Not selected Uncertified screen shot submitted
	Check if any person is already approved under other applications. If missing information check Business Plan and Q 12 BCIF		Y	<i>List Approved People with their QPATE</i>	Rudsel Lucas as rep of RedLuc Directors MD: Martin Carlesund (MC) is a former UBO, and current MD on EG Overseas Services BV MD Pal Von Bahr (PVB) is a former UBO, and current MD on EG Overseas Services BV CO: Tiago Luis CTO: Laurentiu Neagu CEO and CCO : Gilad Ben Ami CFO: Asaf Gov

				Location	Checked	Instructions	Comments
							Same roles reflected in the business plan. (The CEO and CCO differ in Q12 of the latest BCIF submitted which was not approved)
e	Updated company structure diagram showing equity and control percentages, signed by a company director of the applicant company.			BCI 10.1	Y	<i>Must be dated within the last 3 months of submission. Check Director with submission CS.3</i>	Yes.
CS.1.3	Shows Control Percentage				Y		Yes
CS.1.4	Equity Adds Up				Y	<i>Remark if there are minority shareholders.</i>	yes
CS.2.1	Share ledger of the applicant company including companies holding 10% or more shareholding in the applicant company and all persons holding 10% or more shareholding in the applicant company. (Ultimate Beneficiary Owners) or trust deed.			BCI 10.2	Y	<i>Make sure share ledger lists all involved parties. Request trust deed.</i>	Yes
	Calculate all percentages equal to or more to ten percent.				Y		Yes
	List all Companies in Share Ledger of the applicant company				Y		
	% share	Company Name.	Company Reg. No	Country	BCI 10.2	Y	<i>List all companies having 10% or more shareholding here. If no companies are involved then delete this section.</i>
	100	Evolution Malta Holding Limited				Y	Als, DR and SL submitted. MC and PVB are also (sole) directors on this holding company.

					Location	Checked	Instructions	Comments											
								Verified on MBR. This company in turn is owned by a Swedish listed company Evolution AB with company registration number 556994-5792. A COI indicating board members and MDs was submitted. Sole MD is MC. No board member submitted a PHDF. The list of shareholders submitted, together with the corporate structure, shows one qualifying UBO. Namely, Candle Lake Limited a company incorporated in owns 20.53% of the shares in Evolution AB. This in turn, is owned by a single UBO, Kenneth Dart, who did not submit a PHDF. No statutory documentation on Candle Lake Limited was submitted A sponsoring letter was allegedly requested. This does not appear in the check lists and could not be verified.											
CS 2.2	External Sources Verification	<table><tr><td>NorthData</td><td></td></tr><tr><td>ICIJ</td><td></td></tr><tr><td>Lexis Nexis</td><td></td></tr><tr><td>AMLRISK</td><td></td></tr><tr><td>LinkedIn</td><td></td></tr></table>		NorthData		ICIJ		Lexis Nexis		AMLRISK		LinkedIn						<i>Using the external reference sources to verify company structure. Use country specific company registries to trace more</i>	LN searches done on applicant company, Evolution, Candle Lake, JovB
NorthData																			
ICIJ																			
Lexis Nexis																			
AMLRISK																			
LinkedIn																			

					Location	Checked	Instructions	Comments
		Address (Google Maps)					<i>information on the company.</i>	investments and fros ventures. Evolution generated too many hits for download.
CS.2.3	List all persons in Share Ledger over 10% -				BCI 10.2	Y	<i>There has to be at least one UBO. All UBOs of companies with controlling interest must be listed. This section is linked to BC.</i>	
	Company Belonging to:	Full Name	Passport Number	Country of Issue				Martin Olof CARLESUND personal appointments - Find and update company information - GOV.UK Carlesund Martin Olof - Licence summary
						Y		

					Location	Checked	Instructions	Comments															
	External Sources Verification	<table><tr><td>NorthData</td><td>X</td></tr><tr><td>ICIJ</td><td>X</td></tr><tr><td>PRADO</td><td></td></tr><tr><td>Lexis Nexis</td><td></td></tr><tr><td>AMLRISK</td><td>x</td></tr><tr><td>LinkedIn</td><td>-</td></tr><tr><td>Onfido</td><td></td></tr><tr><td>Address (Google Maps)</td><td></td></tr></table>	NorthData	X	ICIJ	X	PRADO		Lexis Nexis		AMLRISK	x	LinkedIn	-	Onfido		Address (Google Maps)					Using the external reference sources to verify company UBO are involved in other gaming companies or business. Also remark if we suspect that this is a shadow UBO.	
NorthData	X																						
ICIJ	X																						
PRADO																							
Lexis Nexis																							
AMLRISK	x																						
LinkedIn	-																						
Onfido																							
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		Location	Checked	Instructions	Comments
2.4	SOW declaration including supporting documents	Check question 1	Y	<i>Insufficient documentation – send a ticket</i>	Q8 -9 BCIF: indicates that the company has two bank accounts and no wallets FS 2022: Showing a net result of Eur 328,161 FS 2023: Showing a net result of Eur 354,012 FS 2024, Showing a net result of Eur 493,234 FS's show substantial revenue made and liquid assets Consolidated income for Evolution AB, interim report, for Jan-March 2025, showing a net profit of Eur 254,669 (grouped in thousands) annual reports of Evolution AB 2022-2024 Latest BP does not have financial projections

		Location	Checked	Instructions	Comments
					An SOF declaration signed by the directors of the company, declaring that the funds which have been used 'to purchase interest' in the applicant company, are funds obtained from evolution gaming operations – which was publicly announced in the press release.
	SOF for new companies and reactivating companies		Y	<i>In the event of insufficient funding a ticket is sent for clarification.</i>	iGaming industry rocked by corporate espionage scandal Evolution Malta Holding Limited - Regulatory sanctions Evolution faces \$25K fine for compliance breaches Evolution-owned Ezugi obtains licence from GB Gambling Commission - Licensing - iGB

					Location	Checked	Instructions	Comments
								Betsafe violates Lithuania gambling law, escapes sanctions -
	Verify objects of the company are for gaming				AI	Y		Questionable for a B2B. 'Offshore games of chance and wagering through the internet'
	Certificate of Good Standing (for tax purposes)						\	NO
	Ensure board management requirements are met					Y	Check voting rights and appointment.	Yes. One or more directors
CS 3.4	Articles of .Incorporation of companies holding 10% or more shareholding in the applicant company:					Y		
	%	Company Name	Company Reg. No	Country	BCI 10.3	Y	Replicate 3.4. and 3.4.1 for every company	
						Y		
CS 3.4.1	External Sources Verification	NorthData ICIJ PRADO Lexis Nexis AMLRISK LinkedIn Address (Google Maps)					For each company verify links and registrations	
CS.4.1	Directors list for the applicant company including companies holding 10% or more shareholding in the applicant company.				BCI 10.3			

							Location	Checked	Instructions	Comments													
	Company	VP	ST	Full Name	Passport Number	Country of Issue	AI		<i>List all Directors. Check VP if director has voting powers. ST if it has statutory powers. Check with CS 3.4 above</i>														
								Y															
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CS.4.2	Managing Directors as Official Representatives						BCI 10.3																
	Trust Company	Full Name			Passport Number		AI		<i>List all Managing Directors. Check VP. Must at least have one.</i>														
	Rudluc Directors NV				Co Reg 138268			Y		MOC + PJVB are also directors Both submitted PHDF www2.curacao-chamber.com/excerpt.asp													

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- CLs to be raised:
- To obtain statutory documentation (Ais. SL and DR) of Candle Lake Limited
 - To obtain PHDF and relevant enclosures of Kenneth Dart