

BUSINESS PLAN

LOWELL & PRUITT N.V.

Registration number

144786

Registered office

Groot Kwartierweg 10, Livestrong Building, Curacao

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SECTION 1: OVERVIEW OF BUSINESS PRODUCTS, SERVICES/BRANDS, AND PROPRIETARY IP

1. BUSINESS OVERVIEW

1.1. Company Background

Lowell & Pruitt N.V. (the “Company”) is a company that was incorporated in Curacao on September 05, 2017, with company registration number 144786 and registered office at Groot Kwartierweg 10, Livestrong Building, Curacao.

The incorporation of the Company has been undertaken specifically with the intent to operate in the i-gaming industry under the Curacao license.

Main objective of the Company is B2C operation, creation and development of the online casinos, accessible to customers in specific countries. Through B2C activity, the Company aims to promote existing brands that attract customers by offering a secure, responsible and engaging environment for enjoying a variety of casino games and sports events.

The ultimate object of the Company is to continuously develop its services and products to align them with the public expectations and innovations in the gaming industry.

2. PRODUCTS AND SERVICES/BRANDS

2.1. B2C Services

The Company aims to stand out in the i-gaming industry by creating an online environment with a wide variety of casino games and sportsbooks from trusted providers, permanently expanding the offering in order to engage players worldwide from different jurisdictions.

The Company’s focus is to run and promote websites that are easy to use, where customers can quickly sign up, securely deposit money, enjoy various casino games, place sports bets and easily withdraw winnings.

Currently Company operates two following websites:

www.bahsegel.com

www.vemapostar.com

The Company’s main market objectives are Pre-Regulated/LATAM, Asia, Europe and Africa markets.

2.2. Proprietary Intellectual Property

Lowell & Pruitt N.V. holds following trademarks which collectively contribute to the uniqueness of Company’s offerings:

- BAHSEGEL, registered European Union Trade Mark under filing number 017150591;
- VEMAPOSTAR, registered European Union Trade Mark under filing number 018779879.

3. UNIQUE FEATURES AND COMPETITIVE EDGE

Company's competitive edge is derived from:

Diverse range of payment solutions. Players of Company's online casinos have the opportunity to utilize credit and debit cards, e-wallets, and cryptocurrency options. Available payment methods are selected to provide convenience and accessibility to players across various regions, ensuring seamless transactions in multiple currencies.

Extensive selection of casino games and sports events. The gaming portfolio includes an extensive selection of casino games and sports events. Additionally, the integration of real-time sports events, covering a multitude of sports and leagues make Company's websites attractive for both casino and sports fans alike.

Stringent Anti-Money Laundering compliance, implementation of powerful anti-fraud solutions and an internal risk analysis team. Adhering to stringent AML regulations, the Company employs anti-fraud solutions to actively detect and prevent any suspicious activities. Company continuously monitors transactions and user behavior, promptly identifying and mitigating potential risks.

Team of highly skilled professionals. In today's highly competitive online gaming industry, strategic management and a team of highly skilled professionals play a crucial role in maintaining competitiveness. Company adheres to regular training programs, conferences, and various meetings in order to stay ahead of industry trends and adapt swiftly to technological advancements and customer needs.

Set of strategic and design tools which are designed to ensure that player's stay on the website is engaging and enjoyable. The websites are designed with users in mind, making them easy to navigate. Regular improvements to the design are based on data and feedback from users. This ongoing process aims to make the websites visually appealing and also ensures that players have an engaging and enjoyable experience right from the start.

Linguistic models to support players. Company has deployed linguistic models to provide efficient and responsive customer support. These models are designed to understand and respond to player queries in multiple languages, offering timely assistance and information. The models are programmed to handle a broad range of inquiries, from account-related issues to gameplay guidance, contributing to a 24/7 support system that enhances the overall customer satisfaction and experience on the websites.

In addition to the previously mentioned competitive features, the Company is actively working on implementing cutting-edge technology that will enable a password-less login system on the website. This innovative approach will enhance the convenience for players and provide a seamless and secure login experience, further ensuring the overall user satisfaction and convenient technological environment for players.

SECTION 2: COMPANY MANAGEMENT STRUCTURE

1. COMPANY MANAGEMENT STRUCTURE

The organizational structure of the Company is designed to ensure clear separation of roles, accountability, and logical reporting lines, with a particular emphasis on compliance. The following information illustrates the key management roles and their reporting relationships:

1.1. Key Management Roles

Chief Executive Officer (CEO)

The CEO, Nodir Pulatov, has a vast amount of experience in the online gaming industry.

Being Director at Talkegy LTD (company incorporated under the laws of England and bearing registration number 12322921), Nodir Pulatov is involved in software development along with support services provision to Curacao licensed entities.

By combining these businesses, Nodir Pulatov can efficiently ensure incorporation of software innovations into the development of Company's i-gaming features and ensure that best user experience is taken into account when creating an environment for casino games and sports events.

Chief Financial Officer (CFO)

As the CFO, Karina Rakytska manages the financial aspects of the Company. This includes financial planning, budgeting, and ensuring compliance with financial regulations. Karina plays a critical role in maintaining financial responsibility and transparency.

Chief Compliance Officer (CCO)

Anastasiya Orlova has been appointed as Chief Compliance Officer.

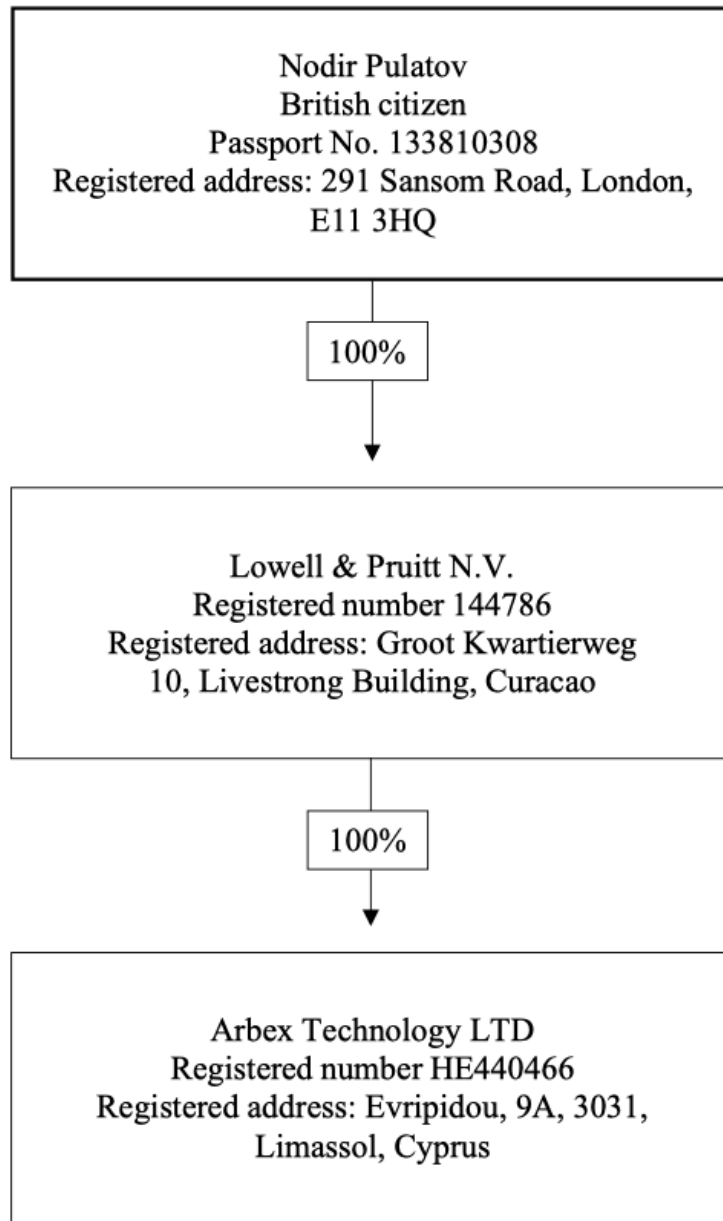
In collaboration with EM Group, CCO effectively oversees and manages all legal affairs and activities:

- provides legal guidance on complex legal issues affecting Company;
- identifies, assesses and mitigates legal risks associated with the Company's operations;
- develops policies, guidelines;
- ensures compliance with applicable laws, regulations, and corporate governance standards;
- overseas contract negotiation and drafting processes;
- establishes and enforces compliance programs to ensure adherence to legal and regulatory requirements, etc.

Chief Technical Officer (CTO)

Currently, Company is in the process of hiring a CTO and plans to close this position in Q1 of 2024.

2. COMPANY OWNERSHIP STRUCTURE



SECTION 3: BUSINESS FORECASTS

Please refer to Attachment No. 1

SECTION 4: KEY SUPPLIERS AND MATERIAL DEPENDENCIES

1.1. Key Suppliers

Lowell & Pruitt N.V. recognizes the pivotal role that key suppliers and material dependencies play in sustaining the seamless operation of overall business functions.

These partnerships don't just help things run better but also make sure the Company follows the rules, comply with regulations and offers customers the best experience. Company's key suppliers cover a bunch of services: software provision, payment and gaming solutions, AML compliance.

1.1.1. Corporate Services Provider

Company's engagement with EM Group ensures provision to the Company of following services:

Compliance services: helping to navigate complex regulatory requirements; ongoing monitoring and AML/CFT services to ensure compliance with anti-money laundering and terrorism financing regulations; keeping up with changing legislation and industry standards in order to stay ahead of potential risks and maintain a competitive edge; ongoing compliance with licensing conditions and regulatory standards;

Corporate services: including company incorporation, administration, banking and payments, tax and VAT assistance; expert guidance to remain compliant with the regulations of Curacao jurisdiction.

1.2.1. Providers of Platform and Gaming solutions

The Company has partnered with Edge Solutions LTD as its software provider, and Abudantia B.V. as its gaming content provider. The Company's software solutions are designed to provide a seamless user experience, with a user-friendly interface and innovative features that help to keep players engaged. With the support of Abudantia B.V. and Edge Solutions LTD, the Company can offer cutting-edge gaming technology to its players, delivering a world-class gaming experience that is unparalleled in the industry.

Abudantia B.V. and Edge Solutions LTD provide the following services:

- Full platform solution;
- Sportsbook solutions;
- Third-party content provider;
- Third-party services including payments;
- Affiliate software;
- Customer identification/verification solution; transaction screening solution.

Edge Solutions LTD is responsible for providing technical support to the Company. This includes troubleshooting hardware and software issues, maintaining and upgrading the Company's operational systems, and ensuring the security and reliability of the network infrastructure. Edge Solutions LTD also provides regular system maintenance, data backup, and disaster recovery services. In addition, Edge Solutions LTD helps identify and implement new technology solutions to enhance the Company's operations and improve efficiency. As the primary IT support service provider, Edge Solutions LTD plays a critical role in ensuring that the Company can operate at peak performance and deliver a seamless customer experience.

1.2.1.2. Providers of customer identification/verification solution; transaction screening solution

Customer identification/verification solution is provided to the Company by Abudantia B.V. through Abudantia B.V. 's partnership with Shufti Pro and Covery AL Limited.

Shufti Pro provides a suite of essential services crucial for the integrity and reliability of its online gambling operations. Specializing in ID verification, Shufti Pro's services encompass facial recognition, document verification, and liveness detection. This comprehensive identity verification approach is designed to significantly reduce the risk of fraud, ensuring compliance with Know Your Customer (KYC) and Anti-Money Laundering (AML) regulations.

Covery AL Limited provides extensive screenings against Politically Exposed Persons (PEPs), sanction lists, and adverse media. These screenings involve scouring through 1700+ international databases, ensuring thorough background checks and risk assessments. This extensive global coverage is pivotal for the Company in identifying and mitigating potential financial crimes and ensuring a secure gambling environment.

Transaction screening solution is provided to Company by Abudantia B.V. through Abudantia B.V. 's partnership with Covery AL Limited. This technology serves as a robust compliance tool, which specifically ensures AML compliance by employing algorithms to detect and prevent AML activities within gaming transactions, and Fraud Detection and Prevention by identifying patterns indicative of fraudulent activities.

Offered transaction screening solution operates in real-time, continuously monitoring and analyzing transactions as they occur, which helps Company to swiftly address potential compliance issues.

1.2.2. Provider of Customer Support Services

Riffdale Technologies Ltd, a company incorporated under the laws of Montenegro under registration number 03439135, assumes a crucial role as a key partner, providing customer support services and enhancing B2C interactions.

Riffdale Technologies Ltd offers an extensive range of services, encompassing chat interfaces and email support tailored to ensure requirements of customers, users of the Company's services. Riffdale Technologies Ltd expertise and proficiency extends into the sphere of analytics – a critical tool to optimize customer engagement and satisfaction. This analytical framework enables Company to make informed, data-driven decisions, efficiently refining its services and offerings.

Furthermore, the significance of Riffdale Technologies Ltd extends to its pivotal role in overseeing complaint resolution and relationship management. Demonstrating a nuanced comprehension of customer concerns and feedback, Riffdale Technologies Ltd adeptly turns potential challenges into avenues for growth and enhancement. Their proactive approach towards relationship management not only promptly addresses immediate issues but also cultivates loyalty and trust from individual users.

1.2.4. Payment Agent

Arbex Technology LTD, a company incorporated in Cyprus bearing registration number HE 440466 and having registered office at Evripidou, 9A, 3031, Limassol, Cyprus, acts as a payment agent of a Company.

1.2.5. Banking Arrangements

The Company has already arranged partnership with Finance Incorporated Limited, a financial institution.

Arbex Technology LTD, payment agent of Lowell & Pruitt N.V., has arranged partnership with: Finance Incorporated Limited, UAB Maneuver LT, Payswix UAB and PayDo Canada.

The Company continuously looks for additional banking partners that offer competitive rates, flexible solutions, and follow regulatory requirements. By partnering with multiple banks, the Company can ensure reliable and efficient banking services for its operations.

SECTION 5: RISK ASSESSMENT AND MANAGEMENT

1.1. Three Lines Model

Company realizes that an effective risk management process requires governance with appropriate structures and processes that enable accountability, actions in managing risks, proper level of assurance and advice.

The implemented Three Lines Model represents a principle-based approach targeting effective risk management governance by defining roles and responsibilities within a Company and the relationships among them.

1.1.1. First Line Roles (Business Units)

- Leads and directs actions (including managing risk) and application of resources to achieve the objectives of the organization;
- Maintains a continuous dialogue with the governing body, and reports on: planned, actual, and expected outcomes linked to the objectives of the organization; and risk;
- Establishes and maintains appropriate structures and processes for the management of operations and risk (including internal control);
- Ensures compliance with legal, regulatory, and ethical expectations.

1.1.2. Second Line Roles (Risk Management, Compliance, Legal, Security, Internal Controls)

- Provides complementary expertise, support, monitoring, and challenge related to the management of risk, including:
 - The development, implementation, and continuous improvement of risk management practices (including internal control) at a process, systems, and entity level;
 - The achievement of risk management objectives, such as: compliance with laws, regulations, and acceptable ethical behavior; internal control; information and technology security; sustainability; and quality assurance;
- Provides analysis and reports on the adequacy and effectiveness of risk management (including internal control).

1.1.3. Third Line Roles (Internal Audit)

- Maintains primary accountability to the governing body and independence from the responsibilities of management;
- Communicates independent and objective assurance and advice to management and the governing body on the adequacy and effectiveness of governance and risk management (including internal control) to support the achievement of organizational objectives and to promote and facilitate continuous improvement;
- Reports impairments to independence and objectivity to the governing body and implements safeguards as required.

1.1.4. External Assurance (Third parties)

Provide additional assurance to:

- Satisfy legislative and regulatory expectations that serve to protect the interests of stakeholders;

- Satisfy requests by management and the governing body to complement internal sources of assurance.

1.2. Risk Assessment

Company recognizes the importance of a comprehensive risk assessment process to identify potential threats and vulnerabilities. Risk assessment follows event identification and precedes risk response. Its purpose is to assess how big the risks are, both individually and collectively, in order to focus management's attention on the most important threats and opportunities, and to lay the groundwork for risk response. Risk assessment is all about measuring and prioritizing risks so that risk levels are managed within defined tolerance thresholds without being overcontrolled or forgoing desirable opportunities.

This process involves:

Identify risks. The risk (or event) identification process precedes risk assessment and produces a comprehensive list of risks (and often opportunities as well), organized by risk category (financial, operational, strategic, compliance) and sub-category (market, credit, liquidity, etc.) for business units, corporate functions, and capital projects.

Develop assessment criteria. The first activity within the risk assessment process is to develop a common set of assessment criteria to be deployed across business units, corporate functions, and large capital projects. Risks and opportunities are typically assessed in terms of impact and likelihood.

Assess risks. Assessing risks consists of assigning values to each risk and opportunity using the defined criteria. This may be accomplished in two stages where an initial screening of the risks is performed using qualitative techniques followed by a more quantitative analysis of the most important risks.

Assess risk interactions. Risks do not exist in isolation. Enterprises have come to recognize the importance of managing risk interactions. Even seemingly insignificant risks on their own have the potential, as they interact with other events and conditions, to cause great damage or create significant opportunity

Prioritize risks. Risk prioritization is the process of determining risk management priorities by comparing the level of risk against predetermined target risk levels and tolerance thresholds. Risk is viewed not just in terms of financial impact and probability, but also subjective criteria such as health and safety impact, reputational impact, vulnerability, and speed of onset.

Respond to risks. The results of the risk assessment process then serve as the primary input to risk responses whereby response options are examined (accept, reduce, share, or avoid), cost-benefit analyses performed, a response strategy formulated, and risk response plans developed.

1.3. Risk Registers / Risk Matrix

The Company maintains comprehensive risk registers that document identified risks, their potential impacts, and the corresponding mitigation strategies. These registers are regularly updated to reflect changes in the business environment and to ensure that our risk management strategies remain adaptive and effective. By integrating these internal and external mechanisms, Company demonstrates a proactive commitment to risk evaluation and management. This approach not only safeguards our operations but also instills confidence among stakeholders in ability to navigate challenges and sustain long-term success.

Risk assessment matrix, also known as a Likelihood and Impact risk matrix, is a visual tool depicting potential risks affecting a business. The risk matrix is based on two factors: the *likelihood* the risk event will occur and the potential *impact* the risk event will have. This tool helps us visualize the probability versus the severity of a potential risk.

Depending on likelihood and severity, risks can be categorized as high, moderate, or low. As part of the risk management process, Company uses a risk matrix to help prioritize different risks and develop an appropriate mitigation strategy. Risk matrices work on large and small scales; this system of risk prioritization can be applied at the discrete project level, or at the enterprise level.

Risks are categorized as follows: strategic, reputational, operational (including all IT risks), compliance, financial, and external. The risk assessment matrix works by presenting various risks as a chart, color-coded by severity: high risks in red, moderate risks in yellow, and low risks in green. Every risk matrix also has two axes: one measuring likelihood and one measuring impact. All topics include controls environment and different mitigation procedures.

Typical risks matrix/register:

<i>Item</i>	<i>Category</i>		<i>Insignificant</i>	<i>Minor</i>	<i>Significant</i>	<i>Major</i>	<i>Severe</i>
Risk 1 / Area 1	Strategic	<i>Almost Certain</i>	Medium 5	High 10	Very high 15	Extreme 20	Extreme 25
Risk 2 / Area 2	Operational	<i>Likely</i>	Medium 4	Medium 8	High 12	Very high 16	Extreme 20
Risk 3 / Area 3	Financial	<i>Moderate</i>	Low 3	Medium 6	Medium 9	High 12	Very high 15
Risk 4 / Area 4	IT	<i>Unlikely</i>	Very low 2	Low 4	Medium 6	Medium 8	High 10
Risk 5 / Area 5	External	<i>Rare</i>	Very low 1	Very low 2	Low 3	Medium 4	Medium 5

1.4. Risk Mitigation strategies

Company uses several types of risk mitigation strategies. Often, these strategies are used in combination with each other, and one may be preferable over another, depending on the Company's risk landscape. Company applies the following approaches:

Risk avoidance. It is used when the consequences are deemed too high to justify the cost of mitigating the problem. For example, an organization can choose not to undertake certain business activities or practices to avoid any exposure to the threat they might pose. Risk avoidance is a common business strategy and can range from something as simple as limiting investments to something as severe as not building offices in potential war zones.

Risk acceptance. It is accepting a risk for a given period of time to prioritize mitigation effort on other risks.

Risk transfer. It allocates risks between different parties, consistent with their capacity to protect against or mitigate the risk. One example of this would be a defective product built with some amount of third-party material. The producer of the product may transfer responsibility for a certain fraction of the risk because of this.

Risk monitoring. It is the act of watching projects and the associated risks for changes in the impact of the associated risks.

SECTION 6: TARGET KPIs AND BUSINESS OBJECTIVES

Please refer to Attachment No. 1

SECTION 7: POLICIES AND PROCEDURES

1.1. AML/CFT Policy and Procedure

The Company takes anti-money laundering and countering the financing of terrorism very seriously and has prepared an extensive AML policy to address any potential issues and prevent any illegal activities.

Company's internal AML policy covers a range of vital issues, including, but not limited:

Client due diligence procedures. In addition to standard client due diligence procedures, the Company recognizes the importance of implementing Enhanced Client Due Diligence (ECDD) measures to further mitigate risks associated with money laundering and terrorism financing. ECDD involves a more in-depth analysis of high-risk clients, transactions, and business relationships. This may include obtaining additional information on the source of funds, monitoring transactions more closely, and conducting periodic reviews of high-risk accounts to ensure ongoing compliance.

Transaction monitoring and reporting. The Company has implemented transaction monitoring systems to detect and investigate unusual or suspicious activities promptly. Company's monitoring tools utilize advanced algorithms to identify patterns indicative of potential money laundering or terrorism financing. Company adheres to promptly investigate and, if necessary, report any suspicious transactions to the relevant authorities in compliance with applicable laws and regulations.

Record keeping and documentation. The AML policy emphasizes the importance of thorough record keeping to ensure transparency and accountability. The Company maintains detailed records of client due diligence, transaction history, and any other relevant information. The documentation procedures are designed to meet regulatory requirements and facilitate cooperation with law enforcement agencies when necessary.

Ongoing training and awareness programs. The Company is committed to maintaining a high level of awareness and competency among its employees regarding AML/CFT policies and procedures. Regular training programs are conducted to educate staff on the latest developments in AML/CFT regulations, emerging risks, and effective mitigation strategies.

Regulatory compliance and updates. The AML policy is dynamic and responsive to changes in regulatory requirements. The Company is committed to staying ahead of any amendments or updates to AML/CFT laws and regulations. Company monitors changes in the regulatory landscape and promptly updates internal policies and procedures to ensure ongoing adherence to the highest standards of compliance.

1.2. Responsible Gambling

1.2.1. Responsible Gambling Controls

As a responsible gaming operator, the Company has developed a comprehensive Responsible Gaming Policy, aimed to promote responsible gaming behavior and prevent potential negative impacts associated with excessive or problematic gambling.

Key components of Company's Responsible gaming policy include:

Player education. Company provides accessible information on responsible gaming practices, including the risks associated with gambling and resources for seeking help.

Measures to mitigate risks associated with play. Company offers self-exclusion tools, possibility to establish cool down period, different limits that empower players to limit or restrict their access to gaming services.

Age verification. Stringent age verification measures are in place to prevent underage individuals from participating in gaming activities.

Monitoring and Intervention. Company systems actively monitor gaming patterns, and when signs of potential problematic behavior are detected, Company implements interventions, including communication with the player and, if necessary, temporary account suspension.

Regulatory Compliance. Company adheres to all relevant gaming regulations and industry standards related to responsible gaming. Company continuously reviews its responsible gaming policy to incorporate best practices and legal requirements.

1.2.2. Protecting Minors

The Company takes measures to prevent underage play and may request information to verify a player's age. In cases where age confirmation is pending, the Company reserves the right to restrict or suspend the account until the necessary age verification is completed.

1.3. Complaints and Communication

If any dispute arises out, the Company will within 14 working days of the player's written request enter into good faith conversations in effort to resolve the dispute.

1.4. Transaction Recording

The platform provided to the Company ensures that the correct data is recorded per the established requirements:

Casino Transaction Recording

- the identity of the Players;
- the time the Game began;
- the balance on the Player's account at the start of the Game;
- the sums placed by Player placed in the Game (time-stamped);
- the Game status (in progress, complete, etc.);
- the result of the Game and/or Lottery (time-stamped);
- the time the Game ended;
- amount won or lost by the Player;
- the balance on the Player's account at the end of the Game;
- the currency or currencies utilized by the Player.

Sportsbook Transaction Recording

- the identity of the Player;
- the time that the Bet was taken;
- the balance in the Player's account at the start of any Betting transaction;
- the Bets made by any Player;

- amounts won or lost by the Player;
- the currency or currencies used by the Player;
- large wins (as agreed by the Commissioners from time to time);
- transfers of funds (between Players or between any Player and the Operator) in excess of such amount as the Commissioners may from time to time direct in writing to the Operator.

1.5. Privacy Policy

Company prioritizes the privacy and data security of customers. Privacy Policy outlines Company's commitment to protect personal information of users and ensure transparent and secure user experience.

Key elements of Company's Privacy Policy are:

Data Collection and Purpose. Company clearly indicates the types of personal information it collects, the purpose for collecting it and how it will be used. This includes information required for account registration, transactions and personalized gaming experience.

Data Security Measures. Company employs security measures to safeguard customer data against unauthorized access, disclosure, alteration and destruction.

Third Party Partnerships. If Company engages with third-party providers, agreement outlines the principles and standards they must adhere to regarding data privacy and security.

Data Retention and Deletion. Company's policy specifies the duration for which customer data will be retained, and Company commits to deleting or anonymizing data when it is no longer necessary for the stated purposes.

User rights. We respect the rights of the users regarding their personal data, including the right to access, correct, delete or restrict the processing of their information.

Compliance with regulations. Company constantly monitors any changes to the regulations and adheres to applicable data protection laws, ensuring the internal practices align with the highest standards of privacy protection.

1.6. Policies and procedures development

Internal Development. Internally, a dedicated team, comprising legal, compliance, and operational professionals, actively contributes to the creation and review of policies and procedures. This approach allows for a deep understanding of specific operational nuances and immediate responsiveness to evolving industry trends and internal needs.

External Expertise. Permanently, third parties (f.e. EM Group) are engaged to achieve extensive experience in gaming regulations, compliance, and best practices. This external collaboration ensures an objective evaluation of policies and procedures, incorporating a broader industry perspective and aligning Company's practices with global standards and local requirements.

1.7. Timelines and GCB Communication

Company's commitment to transparency and regulatory compliance will be reflected in Company's proactive approach to keep the Gaming Control Board (GCB) apprised of policies and procedures.

Company will adhere to a predefined schedule for policy reviews and updates, ensuring timely adjustments to reflect changes in regulatory requirements, industry standards, or internal processes. Any significant policy changes will be communicated promptly to the GCB, well within the stipulated timelines set by regulatory guidelines.

1.8. Board's Confidence in Qualifications

The board may be confident that the individuals and entities responsible for developing and implementing Company's policies and procedures are highly qualified, competent, and free from conflicts of interest. This confidence is based on:

Qualifications. The individuals and entities involved in policy development possess extensive experience in gaming regulations, compliance, and legal frameworks. Their qualifications are well-documented and align with the specific requirements of the industry.

Competence. Policy development team has a proven track record of successfully navigating complex regulatory landscapes. Their competence is evident in the development of effective policies that not only meet regulatory standards but also contribute to the overall integrity and sustainability of gaming operations.

Conflict-Free Assurance. Those responsible for policies and procedures are not conflicted. This assurance is based on a transparent and robust process that considers potential conflicts of interest and ensures that individuals and entities are dedicated solely to the best interests of Company's gaming operations and regulatory compliance.

Signed by
eMoore N.V., Managing Director C Drommond

