

How player funds are segregated in a funds management procedure (breakdown of the process):

Funds Management Procedure: Segregation of Player Funds

1. Purpose of Segregation

- To ensure player funds are protected from operational risks and company insolvency.
- To comply with regulatory requirements and ensure transparency in financial practices.
- To maintain player trust by safeguarding their deposits, winnings, and balances.

2. Definitions

- **Player Funds:** All deposits, winnings, or balances belonging to players.
- **Operational Funds:** Funds used by the company for business operations, including marketing, salaries, and other expenses.
- **Segregated Account:** A separate bank account designated solely for holding our special funds that correspond to all balances of players on our operation.

3. Our Procedures

We opened a second company Bank account

- Bank account is solely used to hold money in values of player funds. This account is separate from operational account.
- We ensured account is opened in reputable financial institutions with regulatory oversight.

Deposit Player Funds

- All player deposits (via credit cards, e-wallets, or bank transfers) are to be credited directly to PSP (Payment processor) and from there payments for player winnings are made. Weekly we do settlement with PSP for difference between Deposits and Withdrawals of players.

- We ensure near-real-time comparing Balances of players with funds on Settlement account and allocations to second account (segregation account).

Monitor and Reconcile Accounts

- We perform daily reconciliations of player funds to match the total balance in segregated accounts with the total balances in player accounts.
- We use automated systems to monitor account activities and flag discrepancies.

Restrict Access to Segregated Accounts

- We have Limited access to segregated accounts to authorized personnel only.

Maintain a Reserve Buffer

- We maintain a reserve fund in the segregated account to cover potential risks or unexpected demands.
- Reserve fund percentage is based on historical data and risk analysis.

Payouts and Withdrawals

- We process player withdrawals directly from the PSP accounts.
- We ensure withdrawal requests are validated and approved before transferring funds, players are KYC.
- We provide regular updates to players on the status of their withdrawals.

4. Key Safeguards

- **Transparency:** We provide players with real-time access to their account balances and ensure they can track their funds.
- **Audit Trail:** We maintain a detailed audit trail of all transactions involving player funds.

5. Responsibilities

- **Our Finance Team:** Responsible for managing segregated account, reconciling balances, and generating reports.
- **Our Compliance Officers:** Ensure adherence to regulations and perform regular audits.
- **Our IT Team:** Maintain secure systems for fund tracking and monitoring.

6. Tools and Technology

- Our platform (MoneyMatrix) software automate reconciliations and provide real-time reporting.
- We have implemented secure payment gateways to handle player deposits and withdrawals (PSP).
- We monitor fund activity using fraud detection and risk management tools.

7. Communication with Players

- We clearly communicate to players how their funds are protected through terms and conditions.
- We provide customer support for queries related to fund safety and withdrawals.

Conclusion

For our operation the segregation of player funds is a critical procedure that ensures financial security, regulatory compliance, and player trust. By maintaining transparency, performing routine reconciliations, and leveraging technology, we can safeguard player funds effectively.



Sandi Marinic

Entertainment Art BV