

Republic of the Philippines
Zamboanga City Special Economic Zone Authority
Interactive Gaming Regulator - iGlobalPoint.com Corporation

INTERACTIVE GAMING CODE OF CONDUCT

This Code of Conduct shall bind all Licensed Operators which were issued Interactive Gaming Licenses by the Zamboanga City Special Economic Zone Authority (“Authority”, for brevity) and iGlobalPoint.com Corporation (“Master Licensor/Regulator”, for brevity). In abiding by the provisions of this Code of Conduct, the Licensed Operators will fully comply and support the following principles and objectives, to wit:

1. **Compliance:** Licensed Operators will abide by the applicable laws, regulations and judicial determinations on interactive gaming in the Zamboanga City Special Economic Zone and will obtain all the appropriate licenses and permits in order to lawfully conduct their business. Non-compliance with the terms and conditions of the interactive license as identified by the Authority and the Master Licensor/Regulator, or the non-renewal of such interactive gaming license, may be cause for the imposition of sanctions against the Licensed Operator. Licensed Operators will comply with circulars, memoranda, and advisories that may be issued from time to time by the Authority and the Master Licensor/Regulator.

2. **Integrity and Accountability:** To enhance customer confidence in gaming integrity, Licensed Operators will agree to make every reasonable effort to ensure their systems, algorithms, policies, procedures, and practices perform in the manner intended and as portrayed to the customer. This would include satisfying regulatory requirements of the Authority and the Master Licensor/Regulator in order to permit access for inspection and review by an appropriately authorized person under the terms of the interactive gaming license. Any such access will take into account the need to protect confidential information. To ensure fairness of a game, the control system, gaming systems, game performance, and other software applications will be tested and analyzed by an independent, qualified person/entity authorized by the Regulator.

3. **Consumer Privacy and Data Protection:** Licensed Operators will design and operate their systems to afford customers privacy and confidentiality. Data protection is to be provided in accordance with generally accepted methods for protecting proprietary information. Where the information is not proprietary, Licensed Operators will, upon request, make their confidentiality practices and procedures available to their customers. Licensed Operators will likewise institute controls to detect and eliminate fraud and to protect data and their system(s) from internal and external breaches.

4. **Truth in Advertising:** Licensed Operators will be truthful in all promotions and publish only accurate information about their business. Licensed Operators agree to make available the applicable rules, registration procedures and payout percentages for products that they offer.

5. **Audit Trails:** In order to provide clear audit trails and accountability, Licensed Operators will retain detailed transaction records in accordance with Generally Accepted Accounting Practices which will be archived, accessible and auditable by any duly authorized person under the terms of the interactive gaming license or as otherwise mandated by the Authority and the Regulator.

6. **Dispute Resolution:** Licensed Operators will submit to the jurisdiction of the Regulator for the resolution of disputes or to an independent dispute resolution service. Such resolution shall be final and executory.

7. **Limiting Access by Minors:** Licensed Operators must institute controls aimed at preventing minors from accessing their gaming systems and shall not employ a minor in the operation of their business. The controls will require customers to affirm that they are of lawful age in their jurisdiction. Members shall institute reasonable measures to corroborate this information, including but not restricted to the use of age and identity verification services.

8. **Controlling Compulsive / Problem Gambling:** Licensed Operators will promote responsible gambling measures and, where applicable, implement procedures aimed at identifying and curtailing compulsive / problem gambling.

9. **Banking and Transaction Processing.** Licensed Operators will conduct their banking and financial affairs in accordance with generally accepted standards of internationally recognized banking institutions. Licensed Operators will follow and adhere to all applicable laws, rules and regulations pertaining to transaction reporting and will implement anti-money laundering procedures.

10. **Prize Payouts:** Licensed Operators will ensure that there are adequate finances available to pay all current obligations and that working capital is adequate to finance ongoing operations. Licensed Operators will pay winnings and account balances promptly on demand other than for situations where there is suspected fraud or where winnings or account balances are in dispute.

11. **Corporate Citizenship:** Licensed Operators must display good character, honesty and integrity to operate in the interactive gaming industry, will act ethically and responsibly at all times and shall not, directly or indirectly, take any action or conduct any activity that is contrary to the best interests of the public or the industry, or which is unlawfully harmful to their fellow operators. Licensed Operators undertake not to become involved in any activity that is, or which it reasonably suspects to be, unlawful. Licensed Operators shall endeavor

to support public service initiatives, to design and implement their services in order that they preserve and protect environmental resources, avoid depiction of violence, do not target minors and are user friendly and generally accessible to the handicapped.

12. **Member Information:** Licensed Operators will agree to the performing checks on their compliance with the aforementioned criteria, at the direction and sound discretion of the Regulator.

Conforme:

Interactive Gaming Operator

By:

(Name and Signature of Representative)

(Right Thumb mark)

Date:

Signed in the Presence of:

(Name and Signature)

(Name and Signature)