

Tallinn, 27 January 2026

To: HuHu.game OÜ
Registry code: 17421993

LEGAL OPINION

We, Eesti Firma OÜ (registry code 14164797), acting as a professional service provider in the field of corporate and commercial law in the Republic of Estonia, holding a government licence for the provision of trust and company services No. FIU000144, issued by the Financial Intelligence Unit (FIU) of the Republic of Estonia, hereby issue this Legal Opinion at the request of HuHu.game OÜ.

1. PURPOSE OF THE LEGAL OPINION

The purpose of this Legal Opinion is to assess the legal nature of the business model operated by HuHu.game OÜ under the project name “HuHu – Hundred’s Hunters” and to determine whether the said business model qualifies as a game of skill under the laws of the Republic of Estonia. This Legal Opinion is limited to the legal qualification of the game mechanics and does not address licensing, regulatory approvals or supervisory procedures.

2. SOURCES OF INFORMATION

This Legal Opinion is based on:

- a) information published on the official website huhu.game;
- b) descriptions of the game mechanics, compliance statements and terms of use provided by the operator;
- c) the Gambling Act of the Republic of Estonia (consolidated version published in Riigi Teataja, entry into force 01.01.2026).

No independent technical audit, software code review or operational testing was conducted for the purposes of this Legal Opinion.

3. DESCRIPTION OF THE GAME MODEL

Based on the reviewed materials, the HuHu project represents a real-time digital multiplayer game with the following characteristics:

- a) all participants interact within a single shared game environment;

- b) the game operates through a sequential counter progressing from 1 to 100;
- c) each player action advances the counter by one unit;
- d) the round is completed when the counter reaches a predetermined target value;
- e) the outcome of each round depends on the players' reaction speed, attention, timing and active participation;
- f) the game mechanics are transparent, predictable and identical for all participants;
- g) the game does not rely on randomness, chance or hidden algorithmic decision-making.

4. APPLICABLE LEGAL FRAMEWORK

4.1. Definition of Games of Skill

Pursuant to § 3 (4) of the Gambling Act of the Republic of Estonia, games of skill are defined as games: *"the outcome of which depends predominantly on the physical skills or abilities or knowledge of the player."*

4.2. Requirements for the Organization of Games of Skill

According to § 41 (3) of the Gambling Act, the organizer of a game of skill must ensure that:

- a) players with skills generally obtain better results than players without skills;
- b) a player does not obtain a significant outcome without active involvement in the game;
- c) a player who participates passively does not obtain a prize or obtains only an insignificant result.

5. LEGAL ASSESSMENT

5.1. Predominance of Skill

The HuHu game mechanics are structured in such a way that the decisive factor influencing the outcome of each round is the player's skill, including:

- a) reaction speed;
- b) timing of actions;
- c) situational awareness;
- d) ability to assess the behaviour of other participants in real time.

The outcome is not influenced by random events or chance-based mechanisms.

5.2. Active Participation Requirement

Success in the HuHu game requires continuous and active participation. A participant who does not actively engage in the game process cannot achieve a meaningful result. This corresponds directly to the requirements set out in § 41 (3) (2) of the Gambling Act.

5.3. Differentiation Between Skilled and Passive Players

Players demonstrating higher levels of skill, attention and reaction speed consistently achieve better results than players who act passively or without strategic consideration. This satisfies the criterion established in § 41 (3) (1) of the Gambling Act.

5.4. Passive Participation

The game mechanics do not allow a participant who remains passive to obtain a meaningful result. Passive behaviour does not lead to success in the game. This is consistent with § 41 (3) (3) of the Gambling Act.

6. Legal Qualification Under Estonian Law

Taking into account the structure of the HuHu game, its mechanics and the applicable provisions of Estonian law, it can be concluded that:

- a) the outcome of the HuHu game depends predominantly on the skills, abilities and actions of the players;
- b) the game mechanics comply with the statutory criteria for games of skill;
- c) the HuHu project qualifies as a game of skill within the meaning of § 3 (4) of the Gambling Act of the Republic of Estonia.

7. Qualification of the Game Model in the European Union

There is no harmonized European Union legislation governing gambling or games of skill. The legal qualification of such activities is primarily regulated at the level of individual EU Member States. Nevertheless, a consistent legal approach has been developed across the European Union, including through the case law of the Court of Justice of the European Union, according to which the decisive criterion for classifying a game is whether its outcome is determined predominantly by skill or by chance.

Activities in which the outcome depends primarily on the knowledge, attention, reaction speed or abilities of the participant are generally recognized across EU Member States as games of skill rather than games of chance. Taking into account the deterministic nature of the HuHu game mechanics and the predominance of player skill in determining the outcome, the HuHu game model corresponds to the generally accepted European legal concept of a game of skill.

Accordingly, while the final legal qualification remains subject to the applicable national legislation of each individual Member State, the HuHu game model would, by its nature, be classified as a game of skill across the territory of the European Union under the prevailing legal criteria applied in EU jurisdictions.

8. Conclusion

Based on the analysis above, we are of the opinion that the business model operated by HuHu.game OÜ (17421993) under the project "HuHu – Hundred's Hunters" constitutes a game of skill under the laws of the Republic of Estonia.

The decisive factor determining the outcome of the game is the player's skill, and the game is organised in compliance with the statutory requirements applicable to games of skill.

9. Disclaimer

This Legal Opinion has been prepared exclusively for **HuHu.game OÜ** for informational purposes and reflects our legal assessment of the nature of the game model based on the information made available to us.

This Legal Opinion is based on:

- a) the factual descriptions of the game mechanics provided by the addressee;
- b) publicly available information;
- c) the legislation of the Republic of Estonia in force as of the date of issuance.

This Legal Opinion does not constitute a regulatory approval, licensing decision or binding interpretation by any supervisory or judicial authority. No technical audit, source code review or independent verification of the software implementation has been conducted.

The conclusions set out herein are limited to the legal qualification of the game model as described and may require reassessment in the event of any material change to the game mechanics, structure or method of operation. Neither the issuer of this Legal Opinion nor its representatives assume any responsibility or liability towards any third party relying on this document without prior written consent.



Ilja Nikiforov
Lawyer / Management Board Member

