

CUSTOMER RISK ASSESSMENT																
Customer Risk			Delivery Channel Risk			Transaction Risk			Product Risk			Jurisdictional Risk				
Customer Type	Score	Actual	Channel Type	Score	Actual	Payment Method	Score	Actual	Game Type	Score	Actual	Jurisdiction	Score	Actual		
Client is a PEP	8	8	Remote & automated registration on an electronic platform without 3rd party intervention	1	1	Bank Transfers (IEA or equivalent safeguard)	1	1	Fixed odds games without hedging	1	0	Low Risk	1	0		
Client is not a PEP	1	0				Debit/Credit cards issued by banks (IEA or UK)	1	0	Fixed odds games where hedging is possible	2	0	Medium Risk	2	0		
Sanctioned Client	8	0	Refinance used	2	0	Debit/Credit cards issued by other licensed institutions	2	0				High Risk	3	0		
Non-Sanctioned Client	1	0				IEA Licensed Payment Service Providers - GumbarPay, Cleanpay, SafeCharge, Credorax, Skrill, Neteller, NetFront, Jeton Wallet, Vok, CoinPoker, CoinPoker, JetonPay, MuchBetter, EcoPayz, BluzPay, Non-IEA Licensed PSP - Jeton Cash	2	0								
High rollers (VIP Customers)	3	0				IEA Licensed PSPs that can be funded by cash or agent cash	3	3								
Problem Gamblers	8	0				Prepaid Cards / Vouchers - Interac, Paysafecard (Skrill), Paysafecard (SafeCharge), Neosurf	3	0								
Customers with links to crime or under investigation	8	0				Peer to Peer transfers	3	0								
Customer with no Adverse Media hits	1	1				Cash	3	0								
Client has serious Adverse Media hits	8	0				One active payment method	1	0								
Customers with links to terrorist financing	8	0	Documentation authenticity issues or reluctance to provide documentation requested	8	0	Two or more active payment methods	2	0								
High velocity of deposit transactions (6 in 3 hours)	3	0				Closed Loop Policy adhered to	1	0								
Single Source of income and /or regular source of income that is easily verifiable	1	0				Closed Loop Policy not adhered to	2	0								
Multiple Sources of income	3	0														
Excess charges in activity and /or balance left for long time in the account, without any activity	3	0														
Deposit and withdrawal without playing	3	0														
Source of Funds / Wealth concerns without reasonable explanation	3	0														
Single deposits exceeding Eur 1000	3	0														
Deposits within 24 hours exceeding Eur 2000 in value	3	0														
Customer carrying out high risk activities	8	0														
Eur 1000 deposited within a week	1	0														
Chargeback/s requested by player	2	0														
Wealth derived from a cash intensive business	1	0														
MAXIMUM SCORE	8			1			1			0			0		12	
																RNAME ?

High Risk Activities include:
i. Production or activities relating to explosives;
ii. Adult entertainment;
iii. Off & Gas Industry;
iv. Manufacturing Printing of currencies;
v. Providing services to military;
vi. Manufacturing of weapons or
vii. Sale of weapons.

Cash Intensive Businesses include:
Restaurants
Grocery or convenience stores
Retail businesses
Parking garages
Vending machines
Contract workers who receive payment in cash (e.g., construction or trucking)

Keep in mind that the above cash-intensive business list is not all-inclusive.