

BRA - Annex 1 - Risk Factors and Risk Scenarios

Interstellar Entertainment N.V.

Customer Risk										
Risk Analysis			Inherent Risk				Control Effectiveness and Mitigation		Residual Risk Rating	Risk Appetite
Risk Number	Risk Name	Risks & Impact	Inherent Impact Scoring	Inherent Likelihood	Inherent Risk	Inherent Risk Rating	Mitigation Actions	Control Effectiveness	Residual Risk Rating (As derived from)	Risk Appetite Weighting
1	UBO's remain anonymous	Provision to services to clients which keep the identity of beneficial owners anonymous and in doing so, facilitating ML or FT.	5	2	10	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required.	Effective	#NAME?	Accept
2	Lack of Identity Verification	False or Stolen Identity Documentation used to bypass controls to facilitate the laundering of criminal funds	5	3	15	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions of fraud or stolen identities.	Effective	#NAME?	Accept
3	Sanctioned Players	The risk that the Company services players included on a sanctions list	5	3	15	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there are any sanctions or adverse media on such individuals or confirmed convictions of fraud or stolen identities.	Effective	#NAME?	Accept
4	Politically Exposed Persons (hereinafter referred to as "PEPs")	The risk that a player is a PEP, family member of close associate of a PEP abuses the Company's services to make use of/channel funds which were received illicitly in connection to their office (bribery, corruption etc.). This risk can manifest at onboarding stage or during a business relationship whereby a player becomes a PEP	4	3	12	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Enhanced due diligence is carried out on high risk players such as PEPs, whereby more extensive information is collected on such individuals. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions of fraud or stolen identities.	Effective	#NAME?	Accept
5	Wagering with Criminal Proceeds	Customers playing beyond what they can afford and could be using proceeds of crime to play with the Company.	5	3	15	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions.	Effective	#NAME?	Accept

6	Fraud	Players carrying out fraud on the Company's platforms	5	3	15	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential fraud.	Effective	#NAME?	Accept
7	Gambling Problems	Customers with a gambling problem present a higher money launder risk as they may steal money to fund their play.	4	4	16	#NAME?	As part of the transaction monitoring undertaken by the Company and in line with its responsible gambling obligations the Company assesses players for responsible gambling risks and has rules in place to restrict or block players that have gambling problems. This will help the Company to mitigate the risk of such players using stolen funds to wager on its platforms.	Effective	#NAME?	Accept
8	Risk of Collusion	Customers who 'collude' present a higher ML and TF risk, as their actions reduce Customer losses and reduce the 'cost' of ML.	5	2	10	#NAME?	The Company monitors players during their wagering to ensure that their gameplay does not have red flags of possible collusion. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. 'The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. This allows the Company to identify the individuals in cases of potential collusion. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions, including potential cases of criminal allegations of collusion.	Effective	#NAME?	Accept
9	Mule Accounts	Customers who allow multiple Customers or provide their login details to other people (i.e., Mule Accounts) to play on the same account could present an increased ML risk as it may be unclear what the source of funds is.	5	3	15	#NAME?	The Company has behavioural analytics tools in place to monitor fur sudden changes in betting behaviour or large deposits and withdrawals, amongst other red flags. The Company has IP address tracking tools in place to identify logins from multiple geographic locations. The Company has time-based restrictions in place to limit the number of devices that can access an account simulataneously. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities.	Effective	#NAME?	Accept
10	Players involved in adverse media	The risk that the Company provides services to players on whom there is adverse media	3	3	9	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions.	Effective	#NAME?	Accept
11	Players with criminal records	Customers with a criminal record or adverse media regarding potential criminal connections may present a higher ML and TF risk.	5	3	15	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions.	Effective	#NAME?	Accept
12	Professional Gamblers	Customers who are 'professional gamblers' may present a higher ML or TF risk due to the level of spend and the fact that gambling is their source of funds.	4	3	12	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. In situations where large volumes are deposited and wagered more enhanced information is collected from a SOW perspective. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions.	Effective	#NAME?	Accept

13	Customers not transacting in line with expected profile and or changing or unusual spending patterns	The risk that they are using stolen or illegitimately obtained funds to transact	3	4	12	#NAME?	The Company monitors players during their wagering to ensure that their gameplay does not have red flags and they are wagering in line with their expected profile. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. "The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. This allows the Company to identify the individuals in cases of potential collusion. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions, including potential cases of criminal allegations of collusion. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company.	Effective	#NAME?	Accept
14	Terrorist financing links	Players that have links to terrorism financing.	5	1	5	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential suspicion. The Company restricts registrations, deposits, wagering and withdrawals from certain countries that are more prone to terrorist organisations.	Effective	#NAME?	Accept
15	High velocity transactions	The risk that a player carries out a significant number of transactions in a short period of time and raises the risk of ML/FT taking place.	4	4	16	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential suspicion.	Effective	#NAME?	Accept
16	Player deposits and withdraws without wagering	The risk that players attempt to clean funds by depositing and withdrawing without wagering	4	3	12	#NAME?	The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential suspicion.	Effective	#NAME?	Accept
17	Player requests chargeback	The risk that derives when a player requests a chargeback with the intention to obtain clean funds.	3	3	9	#NAME?	The Company conducts thorough KYC checks to verify the player's identity and address. The Company monitors for unusual patterns of transactions or chargebacks. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required.	Effective	#NAME?	Accept
18	Wealth derived from cash intensive business	The elevated risk presented when customers derived their wealth from cash based businesses, due to the increased risk of tax evasion.	4	3	12	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential suspicion.	Effective	#NAME?	Accept

Services, Product, Transaction Risk										
Risk Analysis			Inherent Risk				Control Effectiveness and Mitigation		Residual Risk Rating	Risk Appetite
Risk Number	Risk Name	Risks & Impact	Inherent Impact Scoring	Inherent Likelihood	Inherent Risk	Inherent Risk Rating	Mitigation Actions	Control Effectiveness	Residual Risk Rating (As derived from	Risk Appetite Weighting

1	Fixed odds games without hedging	The risk that fixed odds games are used for ML/FT without the risk of collusion.	3	5	15	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential fraud.	Effective	#NAME?	Accept
2	Fixed odds games with hedging	The risk that fixed odds games are used for ML/FT with the risk of player collusion and activities such as chip dumping.	4	5	20	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential fraud. The Company also have reporting processes in place to ensure that any transactions identified as suspicious during monitoring are raised to the MLRO to decide whether to submit or otherwise.	Effective	#NAME?	Accept
3	Sportsbetting	The risk that betting on sports activities presents including the risk of collusion and fraud.	2	1	2	#NAME?	The Company does not provide games relating to Sportsbetting.	Very Effective	#NAME?	Accept
4	Peer to Peer Games	The risk presented by peer to peer games, where the control by the Company is limited and the risk of collusion between players is significant.	4	1	4	#NAME?	The Company does not provide relating to Peer to Peer Games.	Very Effective	#NAME?	Accept
5	Use of higher risk payment methods	Higher risk means of payment such as e-wallets, pre-paid cards and crypto currencies may present a higher ML & TF risk due to their potentially anonymous nature.	3	3	9	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company screens all players to ensure whether there is any adverse media on such individuals or confirmed convictions. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential fraud. The Company also have reporting processes in place to ensure that any transactions identified as suspicious during monitoring are raised to the MLRO to decide whether to submit or otherwise.	Effective	#NAME?	Accept
6	Frequently changed payment methods or closed loop policy not adhered to	Customers who utilise multiple payment methods or frequently change their payment methods, or deposit via one method and withdrawal via another (open loop) may present a higher ML & TF risk.	4	3	12	#NAME?	The Company has controls in place to verify that the payment is owned by the player when the player requests a withdrawal to a payment method that is different from the one they deposited with. This proof of payment method is required prior to processing the withdrawal. Emphasis is also placed on verifying the source of funds of the players to ensure that elevated risk posed by the player is addressed through identification and verification of the source of their funding.	Effective	#NAME?	Accept

7	Identity Fraud	Customers attempting to deposit using stolen cards or stolen account credentials (including identity fraud) and therefore funds are proceeds of crime.	5	3	15	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company provides Employee training so that employees will have the skills to identify AML/CFT risks and suspicious activities. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential fraud. The Company also have reporting processes in place to ensure that any transactions identified as suspicious during monitoring are raised to the MLRO to decide whether to submit or otherwise. The Company obtains proof of payment method when a player requests withdrawal to ensure that such payment method belongs to the player.	Effective	#NAME?	Accept
8	Smurfing	Customers who deposit consistently just below the threshold may be attempting to bypass controls.	5	3	15	#NAME?	The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential fraud or evasion of controls. The Company also have reporting processes in place to ensure that any transactions identified as suspicious during monitoring are raised to the MLRO to decide whether to submit or otherwise.	Effective	#NAME?	Accept
9	Peer to peer transfers	Peer to Peer transfer of funds between gaming accounts could indicate increased ML & TF risk, with the funds being 'layered' to obscure the origin.	4	1	4	#NAME?	The Company does not allow Peer to Peer transfers.	Effective	#NAME?	Accept
10	Players using non-EU/EEA PSPs	Customers who use PSPs from outside EEA and/or accept cash or quasi cash could present a higher ML & TF risk.	3	3	9	#NAME?	The Company undertakes due diligence on service providers such as PSPs. All PSPs the Company uses are licensed and regulated and therefore undertake their own KYC and due diligence obligations. The Company assesses the reputability of the jurisdiction when assessing the different PSPs to understand whether the regulatory framework has to appropriate provisions in place that are aligned to the regulation the Company is subject to.	Effective	#NAME?	Accept
11	Players using EU/EEA PSPs	Customers who use PSPs licensed within the EEA.	2	3	6	#NAME?	The Company undertakes due diligence on service providers such as PSPs. All PSPs the Company uses are licensed and regulated and therefore undertake their own KYC and due diligence obligations. The Company assesses the reputability of the jurisdiction when assessing the different PSPs to understand whether the regulatory framework has to appropriate provisions in place that are aligned to the regulation the Company is subject to.	Effective	#NAME?	Accept
12	Players using debit / credit cards issued by banks (EEA/UK)	Customers using debit / credit cards issued by banks in the EEA / UK pose lower risk of ML/FT	2	3	6	#NAME?	The Company undertakes due diligence on service providers such as banks. All banks the Company uses are licensed and regulated and therefore undertake their own KYC and due diligence obligations. The Company assesses the reputability of the jurisdiction when assessing the different banks to understand whether the regulatory framework has to appropriate provisions in place that are aligned to the regulation the Company is subject to.	Effective	#NAME?	Accept
13	Players using debit / credit cards issued by other licensed institutions	Customers using debit / credit cards issued by other licensed institutions pose a low risk of ML/FT.	2	3	6	#NAME?	The Company undertakes due diligence on service providers. All service providers the Company uses are licensed and regulated and therefore undertake their own KYC and due diligence obligations. The Company assesses the reputability of the jurisdiction when assessing the different service providers to understand whether the regulatory framework has to appropriate provisions in place that are aligned to the regulation the Company is subject to.	Effective	#NAME?	Accept
14	Players using prepaid cards / vouchers	Customers using prepaid cards / vouchers pose a higher risk of ML/FT.	4	2	8	#NAME?	The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. Information on the purpose of the account and the source of funds is collected in high risk situations to have visibility on the source of the income used to wager with the Company. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required. The Company undertakes transaction monitoring on an ongoing basis and has rules and triggers in place to identify scenarios of potential fraud. The Company obtains proof of payment method when a player requests withdrawal to ensure that such payment method belongs to the player.	Effective	#NAME?	Accept
15	Players using multiple payment methods	Customers using multiple payment methods pose higher risk of ML/FT.	3	3	9	#NAME?	The Company has controls in place to verify that the payment is owned by the player when the player requests a withdrawal to a payment method that is different from the one they deposited with. This proof of payment method is required prior to processing the withdrawal. Emphasis is also placed on verifying the source of funds of the players to ensure that elevated risk posed by the player is addressed through identification and verification of the source of their funding.	Effective	#NAME?	Accept

Geographical Risk										
Risk Analysis			Inherent Risk				Control Effectiveness and Mitigation		Residual Risk Rating	Risk Appetite
Risk Number	Risk Name	Risks & Impact	Inherent Impact Scoring	Inherent Likelihood	Inherent Risk	Inherent Risk Rating	Mitigation Actions	Control Effectiveness	Residual Risk Rating (As derived from	Risk Appetite Weighting

1	Low Risk	The risk that a player with links to a low risk jurisdiction is using the Company's services to launder funds generated illegally.	2	5	10	#NAME?	The Company undertakes a jurisdictional risk assessment and uses the knowyourcountry scoring methodology that takes into consideration a number of different sources such as the Corruption Perception Index to identify the AML/CFT score for specific jurisdictions. The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required.	Effective	#NAME?	Accept
2	Medium Risk	The risk that a player with links to a medium risk jurisdiction is using the Company's services to launder funds generated illegally.	3	3	9	#NAME?	The Company undertakes a jurisdictional risk assessment and uses the knowyourcountry scoring methodology that takes into consideration a number of different sources such as the Corruption Perception Index to identify the AML/CFT score for specific jurisdictions. The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required.	Effective	#NAME?	Accept
3	High Risk	The risk that a player with links to a high risk jurisdiction is using the Company's services to launder funds generated illegally.	4	2	8	#NAME?	The Company undertakes a jurisdictional risk assessment and uses the knowyourcountry scoring methodology that takes into consideration a number of different sources such as the Corruption Perception Index to identify the AML/CFT score for specific jurisdictions. The Company undertakes player identification on registration and once the regulatory threshold is reached the player is verified unless there are any AML/CFT concerns requiring the player to be verified prior to that. The Company carries out a risk assessment on all players to identify the risk posed by such player and on the basis of such risk assessment they identify what due diligence is required.	Effective	#NAME?	Accept
4	Use of Proxy Servers or VPNs	Players using Proxy Servers or VPNs to bypass controls and disguise the location of registration or play	5	4	20	#NAME?	The Company has geo-blocking technology in place to be able to undertake IP Address verification and have geo-blocking restrictions in place. The digital tools the Company has in place can identify when a VPN is being used and subsequently an assessment is undertaken to decide whether to close the account.	Needs Improvement	#NAME?	Accept
5	Player with links to sanctioned countries	Players with links to sanctioned countries that may be using funds subject to sanctions to wager with the Company.	5	2	10	#NAME?	The Company undertakes sanctions screening on an initial and ongoing basis for all players. In situations where links to sanctioned countries are identified an assessment is undertaken as to whether to continue servicing the player or otherwise. The Company does not service players from sanctions countries.	Effective	#NAME?	Accept

Interface Risk										
Risk Analysis			Inherent Risk				Control Effectiveness and Mitigation		Residual Risk Rating	Risk Appetite
Risk Number	Risk Name	Risks & Impact	Inherent Impact Scoring	Inherent Likelihood	Inherent Risk	Inherent Risk Rating	Mitigation Actions	Control Effectiveness	Residual Risk Rating (As derived from	Risk Appetite Weighting
1	Non-Face to face customers	Remote interface with customers presents a significantly higher risk than non remote or 'quasi' remote gambling, as Customers are able to attempt to bypass identification processes.	4	5	20	#NAME?	Players are identified and verified and information on their source of wealth is collected at least once they hit the applicable threshold. Players are independently screened against sanctions, regulatory oversight, negative news, and PEPs lists prior to onboarding and on an ongoing basis. The CRA records all risks of the customer and the final risk rating is derived.	Needs Improvement	#NAME?	Accept
2	Syndicate Involved / Master Account set-up	'Master Customers' or syndicates have a higher ML & TF risk than 'regular' customers that the Company has direct contact with. Establishing a source of funds for master Customers or syndicates is more complex.	3	1	3	#NAME?	The Company does not allow master account set-ups. The Company undertakes identification and verification of players and verifies the payment method to mitigate the risk of players wagering on behalf of other individuals.	Ineffective	#NAME?	Accept
3	Reliance	The risk posed to the Company when it places reliance on another subject person to undertake identification and verification of a player.	2	3	6	#NAME?	The Company relies on third party providers in relation to Pay n Play players. These providers identify and verify the player prior to the player signing up for an account with the Company. The Company retains the information for identification purposes on such purposes but the verification is undertaken by third party providers.	Effective	#NAME?	Accept

Other Risks										
Risk Analysis			Inherent Risk				Control Effectiveness and Mitigation		Residual Risk Rating	Risk Appetite
Risk Number	Risk Name	Risks & Impact	Inherent Impact Scoring	Inherent Likelihood	Inherent Risk	Inherent Risk Rating	Mitigation Actions	Control Effectiveness	Residual Risk Rating (As derived from	Risk Appetite Weighting
1	Employees	Employees aiding and abetting customers in laundering criminal proceeds through the services provided	5	1	5	#NAME?	The company implements screening checks on its employees prior to hiring, as well as offering training programmes on an ongoing basis. These checks include: - Obtaining police conduct certificate - Character references from former employers - Obtaining proof of address and identity - Social media screening for adverse behaviours	Effective	#NAME?	Accept
2	Employees Turnover	The increased risk brought about by employee turnover, resulting in lack of knowledge and experience with the Company's processes.	3	4	12	#NAME?	The Company implements the following processes to mitigate the risk of employee turnover: - Competitive Compensation and benefits; - Career Development Opportunities; - Employee Engagement Initiatives; - Work-Life Balance	Effective	#NAME?	Accept
3	Any new emerging risks and/or scenarios such as Covid-19 pandemic	The risk that the Company is issued as a vehicle to launder proceeds of crime	3	2	6	#NAME?	Any new emerging risks and trends were being followed closely and relevant employees were made aware of such	Needs Improvement	#NAME?	Accept
4	Outsourced activities	The risk of outsourcing AML/CFT functions to third parties and fails to effectively carry out the outsourced function	5	2	10	#NAME?	MLRO is hired by the Company and is not outsourced	Effective	#NAME?	Accept
5	System errors	Poorly tested controls may lead to missing on a red flag or a potentially illicit activity	5	2	10	#NAME?	Oversight function; -Close cooperation with software providers and customised training for all employees; - System testing at all levels with a variety of cases and scenarios; - Integration only with industry leading providers with proven track record of cooperation and integration; - Experienced IT team and project managers;	Needs Improvement	#NAME?	Accept
6	Increased volumes of clients	Drastic increase in volumes may result in an increased number of human errors and lead to poor process, increasing the likelihood of missing an important red flag data point	3	3	9	#NAME?	The Company constantly assesses the human resources it has in place and the availability of increasing such resources when possible. The Company is also increasing automation in its processes to reduce the need for human intervention.	Effective	#NAME?	Accept

7	Introduction of new products and/or services	Every product/service may be subject to an ML/FT risk and used inappropriately. Prior integration, the assessment shall be made on any service/product to ensure the Company is able to meet its AML/CFT obligations and mitigate potential risks.	4	2	8	#NAME?	Due Diligence is carried out on all vendors/providers/third parties; Internal research and cross functional assessment;	Needs Improvement	#NAME?	Accept
8	Insufficient employee awareness of AML/CFT risks , insufficient understanding of the related services.	Every product/service may be subject to an ML/FT risk and used inappropriately. Prior integration, the assessment shall be made on any service/product to ensure the Company is able to meet its AML/CFT obligations and mitigate potential risks.	4	2	8	#NAME?	Internal training to all employees is provided at least annually. Further more certain employees will also have the possibility to attend external training sessions.	Effective	#NAME?	Accept
9	Outdated policies and procedures	The risk of stale policies and procedures that are out of date	4	1	4	#NAME?	All policies and procedures are review at least once a year or whenever substantial legislative or regulatory changes take place. Any changes in policies and procedures requires Board approval. This will ensure that the policies and procedures continuously meet regulatory requirements as the business grows and evolves.	Needs Improvement	#NAME?	Accept
10	Impact of russia-ukraine conflict	The risk that the Company is used as a vehicle to launder proceeds of crime or imposed sanctions	3	1	3	#NAME?	Russia is on the restricted countries list.	Effective	#NAME?	Accept