



BetU Curaçao B.V.

Client intake and KYC Policy.

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Version	Version Description	Author	Reviewer	Date Approved	Description
1.0	Creation of Policy	BetU Curaçao B.V Compliance	Jason Dean		Initial Creation of Document

2.1 PROCESS NAME

Client Acceptance contains

- Overview
- Purpose
- Regulatory Framework
- Acceptable Use & Excluded Parties
- Client Signup Process
- Identification Requirements
- Client Monitoring
- Client Suspension/Termination Procedures

2.2 OBJECTIVE/GOAL

The objective of this Client Intake Policy for BetU Curaçao B.V. is to establish a clear, structured, and compliant process for onboarding new clients. Key objectives include:

Risk Assessment: To evaluate potential clients' risk levels, ensuring that BetU Curaçao B.V. does not engage with individuals involved in money laundering, terrorist financing, or other financial crimes.

Regulatory Compliance: To ensure adherence to Curaçao gaming regulations, AML/CTF requirements, and international best practices for online gaming operators.

Due Diligence: To conduct thorough KYC procedures, verifying client identity, understanding their gaming activities, and assessing their risk profile.

Responsible Gaming: To implement effective controls that support responsible gaming practices and prevent problem gambling.

Operational Efficiency: To streamline the client onboarding process while maintaining rigorous compliance standards.

Reputation Protection: To safeguard BetU's reputation by avoiding relationships with high-risk clients and ensuring compliance with gaming regulations.

2.3 DESCRIPTION

This document serves as a reference for internal and external stakeholders, providing information accessible to staff and partners at all times.

2.4 PARENT PROCESS

BetU Curaçao B.V. AML/CTF Policy.

2.5 OWNERSHIP

	Primary	Secondary
Name	Ryan Mueller	
Designation	Chief Compliance Officer	
Department	Phantom Compliance	
Email	ryan@phantomcompliance.com	

3 OVERVIEW

3.1 SUMMARY

ITEM 1: PURPOSE

- BetU Curaçao B.V. operates under a Curaçao gaming license, offering online gaming and betting services through BetU Curaçao B.V.
- The company strives to follow Curaçao gaming regulations and international AML/CTF best practices • The customer intake process exists to:
 - Ensure compliance with gaming regulations and AML requirements
 - Verify customer identity and age
 - Prevent problem gambling
 - Detect and prevent fraud and money laundering
 - Protect the company's gaming license and relationships
 - Enable accurate suspicious activity reporting
 - Support responsible gaming initiatives
- BetU Curaçao B.V. operates adheres to all the directives of the Curaçao Gaming Authority (CGA)

ITEM 2: REGULATIONS & FRAMEWORK

- BetU operates under Curaçao gaming regulations • Customer identification must include the following:
 - Valid government-issued photo ID
 - Proof of address
 - Age verification (minimum 18 years for Curaçao)
 - Source of funds for large deposits
- Enhanced due diligence required for:
 - High-volume players
 - Politically exposed persons (PEPs)
 - High-risk jurisdictions
 - Unusual betting patterns

ITEM 3: EXCLUDED PARTIES & ACCEPTABLE USE

BetU only accepts clients who:

- Are 18 years or older
- Reside in jurisdictions where online gambling is legal
 - BetU Curaçao B.V. restricts access to customers in the United States to ensure compliance with the Unlawful Internet Gambling Enforcement Act ([UIGEA](#)).
- Are not subject to gambling exclusions or restrictions
- Are not on sanctions lists
- Can verify their identity and source of funds
- Are not connected to criminal activities

4 CLIENT SIGNUP AND MONITORING.

STEP 1: SIGNUP

1: Initial Application

- Application must be submitted through BetU Curaçao B.V.'s official website which leverages [onfido](#) for KYC verification.
- Players create account by providing the following:
 - Email address (must be unique)

- Password (meeting minimum security requirements)
- Date of Birth
- Phone Number
- System automatically generates a unique customer ID
- Terms & Conditions and Privacy Policy acceptance required
- Responsible Gaming policy acknowledgment required

2: Basic Information Collection

Required information includes:

- Personal Details:
 - Full legal name (as shown on ID)
 - Date of birth (must be 18+)
 - Gender
 - Nationality ○

Primary language ● Contact

Information:

- Current residential address (no P.O. boxes allowed)
- Country of residence
- City and postal code
- Mobile phone number (for 2FA)
- Email address ●

Account Details:

- Username selection (must be unique)
- Password creation ○
- Security questions
- Marketing preferences

3: Initial Verification Procedures

1. Age Verification:
 - Automated check against provided DOB
 - Cross-reference with ID documentation
 - Third-party age verification service check
 - Flagging of any discrepancies
2. Jurisdiction Check:
 - IP address verification
 - VPN detection
 - Geolocation confirmation
 - Restricted jurisdiction screening ○
 - Local gambling law compliance check
3. Duplicate Account Detection:
 - Email address check
 - Phone number check
 - Device fingerprinting
 - IP address history
 - Payment method cross-reference

- Name and address matching
- 4. Sanctions Screening:
 - Check against major sanctions lists:
 - UN Sanctions List
 - EU Sanctions List
 - OFAC SDN List
 - PEP database screening
 - Adverse media screening

4: Document Collection and Verification

1. Government-Issued ID Requirements: ○ Acceptable Documents: ■
 - Valid passport
 - National ID card
 - Driver's license ○
 - Document Verification: ■
 - Not expired
 - Clearly visible photo
 - All edges visible
 - No alterations or damage
 - Machine-readable zone (MRZ) check for passports
 - Digital tampering check
2. Proof of Address Requirements:
 - Documents must be less than 3 months old ○
 - Acceptable Documents:
 - Utility bill (electricity, water, gas)
 - Bank statement
 - Government-issued document
 - Tax assessment ■ Registered lease agreement ○ Must show:
 - Full name
 - Current address
 - Issue Date
 - Issuing organization
3. Source of Funds Documentation: Required for:
 - Initial deposits over €2,000
 - Cumulative deposits over €10,000/month ○
 - Acceptable Documentation:
 - Bank statements (3 months)
 - Payslips
 - Tax returns
 - Investment certificates
 - Company ownership documents
 - Inheritance documentation
 - Sale of property documentation

5: Enhanced Due Diligence (EDD)

Triggered by:

1. PEP Status:
 - Additional documentation requirements: ■ Source of wealth declaration
 - Employment verification
 - Asset ownership documentation
 - Senior management approval is required
 - Enhanced ongoing monitoring
2. High-Risk Jurisdiction Factors:
 - Countries with weak AML controls
 - High corruption risk countries
 - Conflict zones
 - Tax havens Additional requirements:
 - Bank references
 - Additional proof of source of funds
 - Enhanced transaction monitoring
 - Regular review of relationship
3. Large Deposit Verification:
 - Comprehensive source of funds check
 - Bank statement analysis
 - Business ownership verification
 - Income verification
 - Documentation of major assets
 - Regular account review schedule

6: Risk Assessment and Approval

1. Risk Rating Assignment:
 - Low Risk
 - Medium Risk
 - High Risk Based on:
 - i. Jurisdiction
 - ii. Expected activity level
 - iii. Source of funds
 - iv. PEP status
 - v. Occupation
 - vi. Product usage
2. Approval Requirements:
 - Low Risk: Automated approval if all checks pass
 - Medium Risk: Compliance officer review
 - High Risk: Senior compliance approval and ongoing monitoring plan
3. Account Restrictions: Based on risk level:
 - Deposit limits
 - Betting limits
 - Product restrictions
 - Payment method restrictions
 - Enhanced monitoring requirements

7: Account Activation

1. Final Steps:
 - Verification email confirmation
 - Phone number verification (SMS code)
 - Initial deposit limits setting
 - Responsible gaming limits setup
 - Account security setup (2FA if required)
2. Welcome Process:
 - Account features explanation
 - Responsible gaming tools introduction
 - Customer support contact information
 - Compliance requirements explanation
 - Important policies and procedures
3. Initial Monitoring Period:
 - First 30 days of enhanced monitoring
 - Betting pattern establishment
 - Deposit behavior monitoring
 - Gaming preference analysis
 - Risk assessment validation

STEP 2: MONITORING

Ongoing Account Monitoring

1. Betting Pattern Analysis

1. Regular Betting Behavior Monitoring:
 - Bet size tracking
 - Betting frequency
 - Sport/game type preferences
 - Time of day patterns
 - Win/loss ratios
2. Unusual Betting Pattern Indicators:
 - Sudden changes in betting amounts
 - Irregular betting times
 - Unexpected changes in preferred sports/games
 - Unusual betting strategies (e.g., equal bets on all outcomes)
 - High-risk betting patterns (e.g., high stakes on low probability events)
3. Match-Fixing Detection:
 - Correlation of bets across multiple accounts
 - Unusual betting volumes on specific events
 - Bets inconsistent with customer profile
 - Geographic concentration of bets
 - Betting on obscure events/markets

2. Deposit/Withdrawal Analysis

1. Deposit Monitoring:
 - Frequency of deposits
 - Size of deposits
 - Payment methods used
 - Time between deposits
 - Total monthly volume
2. Withdrawal Behavior:
 - Withdrawal frequency
 - Size of withdrawals
 - Withdrawal method preferences
 - Timing of withdrawals post-deposit
 - Withdrawal to deposit ratio
3. Red Flag Indicators:
 - Multiple small deposits followed by large withdrawals
 - Frequent changes in payment methods
 - Withdrawals without corresponding betting activity
 - Round number transactions
 - Multiple account funding sources
 - Third-party payments

3. Account Activity Monitoring

1. Login Behavior:
 - Login frequency
 - Login locations
 - Device types used
 - VPN/proxy usage
 - Failed login attempts
2. Account Changes:
 - Personal information updates
 - Password changes
 - Security setting modifications
 - Contact detail updates
 - Payment method changes
3. Customer Support Interactions:
 - Frequency of contacts
 - Nature of inquiries
 - Complaint patterns
 - Documentation requests
 - Account dispute history

4. Problem Gambling Detection

1. Behavioral Indicators:
 - Increased betting frequency
 - Escalating bet sizes
 - Chasing losses

- Extended playing sessions ○
Night-time gambling patterns
- 2. Financial Indicators:
 - Multiple deposit attempts
 - Failed deposits
 - Use of multiple payment methods
 - Requests to increase limits
 - Declined transactions
- 3. Communication Indicators:
 - Emotional communication with support
 - Requests to reverse withdrawals
 - Complaints about losses
 - Mentions of financial difficulties
 - Requests for bonuses/special treatment

Transaction Monitoring 1.

Unusual Pattern Detection

- 1. Structural Monitoring:
 - Transaction velocity
 - Transaction size patterns
 - Time of day patterns
 - Geographic patterns ○
Payment method patterns
- 2. Account Level Monitoring:
 - Deposit to wagering ratio
 - Withdrawal patterns
 - Account balance fluctuations
 - Currency conversion activities
 - Bonus usage patterns

2. Money Laundering Detection

- 1. Typical ML Patterns:
 - Minimal gambling activity relative to deposits
 - Quick withdrawal after minimal play
 - Structured deposits below reporting thresholds
 - Multiple accounts with linked identifiers
 - Third-party funding attempts
- 2. Enhanced Monitoring Triggers:
 - High-risk jurisdiction connections
 - PEP relationship discovered
 - Adverse media mentions
 - Law enforcement inquiries
 - Complex ownership structures

3. Fraud Detection

1. Account Fraud Indicators:
 - Multiple accounts sharing details
 - Inconsistent KYC information
 - Stolen card indicators
 - Chargeback history
 - Identity theft indicators
2. Bonus Abuse Monitoring:
 - Multiple accounts
 - Irregular betting patterns
 - Coordinate play patterns
 - Bonus hunting behavior
 - Terms violation patterns

Regular Review Procedures

1. High-Volume Account Review

1. Weekly Review Requirements:
 - Transaction volume analysis
 - Betting pattern review
 - Source of funds verification
 - Risk rating reassessment
 - Document update checks
2. Monthly Assessments:
 - Cumulative activity review
 - Pattern analysis
 - Risk level evaluation
 - Document validity check
 - Limit appropriateness review

2. High-Risk Client Review

1. Enhanced Review Schedule:
 - PEP status reviews
 - High-risk jurisdiction updates
 - Source of wealth verification
 - Document refreshment
 - Activity pattern analysis
2. Additional Requirements:
 - Senior management review
 - External database checks
 - Media screening
 - Relationship evaluation
 - Risk mitigation assessment

3. Suspicious Activity Management

1. Investigation Procedures:

- Alert review process
- Investigation documentation
- Evidence collection
- Pattern analysis
- Link Analysis 2.

Reporting Requirements:

- Internal reporting procedures
- Regulatory reporting timelines
- Documentation requirements
- Follow-up procedures
- Record retention **Monitoring**

Technology and Tools

1. Automated Monitoring Systems:

- Real-time transaction monitoring
- Pattern detection algorithms
- Risk scoring models
- Alert generation ○
- Case management

2. Review Procedures:

- Alert investigation
- False positive analysis
- Pattern validation
- Risk reassessment ○
- Documentation requirements

3. Escalation Procedures:

- Alert level definitions ○
- Response timeframes
- Investigation requirements
- Management notification
- Regulatory reporting triggers

4.1 CLIENT INVESTIGATION AND TERMINATION

STEP 1: INVESTIGATION

When unusual client behavior is detected, a thorough investigation process begins. Here's a detailed analysis of each trigger:

Unusual Betting Patterns, this involves monitoring for behaviors like:

- Dramatic changes in betting volume or frequency
- Consistently betting just under reporting thresholds
- Coordinated betting across multiple accounts
- Betting patterns that suggest insider information

- Sudden shifts in betting strategies or risk profiles

Large Deposits/Withdrawals, these raise flags when:

- The amounts don't match known client income or wealth
- There are frequent transactions just under reporting limits
- Money moves through multiple accounts rapidly
- The source of funds is unclear or concerning
- Transactions deviate significantly from established patterns

Suspicious Activity, this encompasses:

- Multiple accounts linked to the same individual or address
- Identity documents that appear altered or inconsistent
- Login attempts from high-risk jurisdictions
- Attempts to circumvent security measures • Unusual patterns in account access or usage

Customer Complaints, these warrant investigation when:

- Multiple customers report similar issues
- Complaints suggest potential fraud or misconduct
- Reports indicate unauthorized account access
- Claims of missing funds or unauthorized transactions
- Patterns emerge in complaint types or affected accounts

Compliance Alerts, these are triggered by:

- Matches against sanctions or watchlists
- Politically Exposed Person (PEP) status changes
- High-risk jurisdiction connections
- Regulatory reporting threshold breaches
- Know Your Customer (KYC) discrepancies

When these triggers occur, the investigation typically involves:

1. Initial risk assessment to determine urgency
2. Collection and review of all relevant account data
3. Transaction analysis and pattern identification
4. Customer communication if clarification is needed
5. Documentation of findings and recommended actions
6. Escalation to appropriate authorities if necessary
7. Implementation of additional monitoring or restrictions

STEP 2: TERMINATION

At BetU Curaçao B.V, maintaining the integrity, safety, and compliance of our platform is paramount. This section outlines the circumstances and processes under which users may be temporarily suspended or permanently terminated from our platform.

Purpose of Suspension

A suspension serves as a preventive or investigatory measure to protect BetU Curaçao B.V., its users, and stakeholders while a suspected issue is investigated or clarified.

Grounds for Suspension

A client may be suspended under the following circumstances:

1. Suspected Underage Gambling

If there is a reasonable belief that a user is below the legal gambling age based on verification discrepancies or reported information, their account may be temporarily restricted while the matter is investigated.

2. Multiple Accounts

Users detected with multiple accounts linked through device IDs, IP addresses, or other patterns of behavior may face suspension to confirm compliance with our "One Account Per User" policy.

3. Fraudulent Activity

Suspicion of fraudulent activities such as payment fraud, chargebacks, or unauthorized transactions may result in a temporary account freeze until resolution.

4. Problem Gambling Indicators

If a user displays behavior indicative of problem gambling (e.g., erratic deposit patterns, self-harm references, or erratic login attempts), BetU Curaçao B.V. may suspend their account to encourage seeking professional assistance and ensure responsible gambling.

5. AML Concerns

Accounts flagged for potential Anti-Money Laundering (AML) violations—such as unusual deposit or withdrawal patterns, connections to flagged entities, or unverifiable identity—will be suspended pending investigation.

6. Terms of Service Violations

Any breach of BetU Curaçao B.V.'s Terms of Service that does not immediately warrant termination but requires investigation may result in temporary suspension.

Suspension Process

1. **Notification:** Suspended clients will be promptly notified via registered email, specifying the reasons for suspension and any actions required to resolve the issue.
2. **Investigation:** The BetU Curaçao B.V. compliance team will thoroughly review the matter within a reasonable timeframe
3. **Outcome:** Based on the investigation, users will either:
 - Have their accounts reinstated.
 - Be subject to further corrective measures or termination.

Purpose of Termination

Termination permanently revokes a user's ability to access the BetU Curaçao B.V. platform due to serious violations, safeguarding platform compliance and integrity.

Grounds for Termination

Termination may be enforced in the following circumstances:

1. Confirmed Underage Gambling

Accounts confirmed to belong to users under the legal gambling age will be terminated immediately and reported to relevant authorities if required by regulation.

2. Money Laundering (ML)

Any confirmed involvement in money laundering activities, including transactions related to terrorism financing, will result in immediate account termination, as mandated by AML legislation.

3. Fraud

Verified fraudulent activity, including but not limited to payment fraud, account takeovers, and collusion will lead to immediate termination.

4. Severe Terms of Service Violations

Major breaches, such as attempting to exploit platform vulnerabilities, engaging in abusive behavior, or any illegal activities, will result in account closure.

5. Regulatory Requirements

Accounts required to be terminated under directives from gaming regulators, law enforcement, or other oversight bodies will be closed to comply with applicable laws.

Termination Process

1. **Notification:** Terminated clients will be notified via email with a detailed explanation of the findings leading to termination.
2. **Funds Handling:** Remaining funds in the account will be processed per applicable laws and internal policies. For example:
 - Legitimate funds will be returned to verified sources.
 - Funds tied to illegal activities may be confiscated or reported to authorities.
3. **Appeals:** Users may appeal account termination decisions within 14 days of notification, provided new evidence is presented for consideration. Appeals can be submitted via [BetU Curaçao B.V. Support].

Important Notes

- BetU Curaçao B.V. reserves the right to suspend or terminate an account based on credible evidence or in response to regulatory requirements without prior notice where necessary.
- All actions are taken in strict compliance with our Terms of Service, applicable AML and gambling regulations, and responsible gaming initiatives.

5 CONDITIONS FOR REVIEW AND UPDATE

Regular Review:

This policy shall be reviewed and updated annually to ensure its continued relevance and effectiveness. The review will be conducted by the Compliance Officer and approved by senior management.

Trigger Events:

In addition to the annual review, this policy will be reviewed and, if necessary, updated promptly in response to the following trigger events:

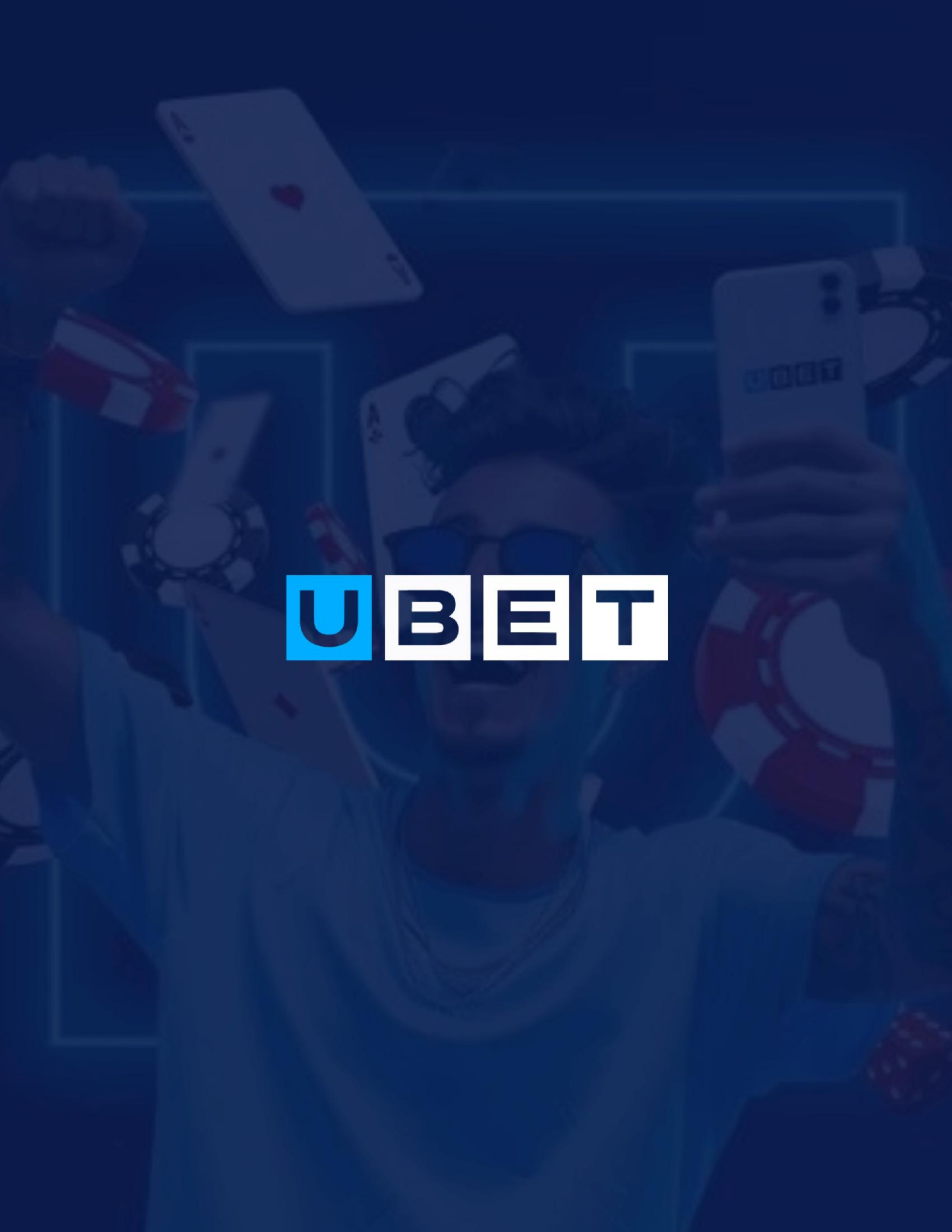
- Significant changes in relevant laws, regulations, or regulatory guidance.
- Major changes in the business operations, structure, or strategic direction of the organization.
- Identification of deficiencies in the policy or its implementation during audits, compliance reviews, or incidents of non-compliance.

- Emergence of new sanctions lists or updates to existing sanctions lists that impact the organization's operations.

Documentation and Approval:

All reviews and updates to this policy will be documented, including the rationale for changes and senior management's approval of the revised policy. The Compliance Officer is responsible for ensuring that all employees are informed of and trained on any changes to the policy.

Pending the occurrence of a trigger event, the next scheduled review and update of this policy will take place in **April 2026**.

A man with curly hair and sunglasses is celebrating at a casino table. He is holding a smartphone in his right hand that has the 'UBET' logo on the back. He is also holding a playing card (Ace of Spades) in his left hand. The background is a blue-tinted image of a casino table with various playing cards and chips scattered around. The 'UBET' logo is prominently displayed in the center of the image.

UBET