

Red Lane B.V.

23.06.2026

1. Executive Summary

Red Lane B.V. recognizes that its business model involves operational and commercial exposure to both Turkey and Georgia. Turkey represents the Company's primary intended customer market, while certain management, compliance, and operational functions are conducted from Georgia.

The Company acknowledges that both jurisdictions present specific legal, regulatory, AML/CFT/CPF, payment processing, operational, sanctions, financial crime, and reputational risks. Accordingly, Red Lane B.V. has implemented a comprehensive jurisdictional risk management framework designed to identify, assess, monitor, manage, and mitigate these risks while ensuring that all movement of funds is legitimate, transparent, traceable, and supported by appropriate controls.

2. Turkey – Jurisdictional Risk Assessment

2.1 Regulatory and Legal Risk Assessment

Turkey is considered a higher-risk operating environment from a regulatory and payment processing perspective due to evolving laws, restrictions affecting payment mechanisms, and increased scrutiny of cross-border financial transactions.

The Company has identified the following risks:

Regulatory Risks

- Regulatory changes affecting online gaming activities;
- Changes affecting payment providers servicing Turkish customers;
- Restrictions on cross-border financial services;
- Regulatory enforcement actions affecting financial intermediaries.

Legal Risks

- Changes to local gambling-related legislation;
- Restrictions affecting customer payment channels;
- Increased regulatory expectations concerning AML compliance.

Risk Mitigation Measures

To manage these risks, Red Lane B.V.:

- Conducts ongoing monitoring of legal and regulatory developments;
- Performs periodic jurisdictional risk reviews;
- Maintains external legal and compliance support where necessary;
- Reviews payment processing arrangements on an ongoing basis;
- Restricts or terminates services where legal or regulatory risks become unacceptable.

2.2 AML/CFT/CPF Risk Assessment – Turkey

The Company recognizes that Turkey presents elevated AML/CFT risks due to:

- Significant cross-border financial activity;
- Use of alternative payment channels;
- Risks associated with online gambling transactions;
- Potential abuse of gaming platforms for layering and integration activities;
- Risks associated with high-volume payment activity.

Specific Money Laundering Risks Identified

The Company has identified the following potential typologies:

Structuring

Customers may attempt to divide transactions into multiple smaller deposits or withdrawals to avoid detection.

Rapid Deposit and Withdrawal Activity

Customers may attempt to use gaming accounts primarily as a fund-transfer mechanism rather than for legitimate gaming purposes.

Bonus Abuse and Minimal Gaming

Customers may make deposits, engage in minimal wagering activity, and seek rapid withdrawals.

Third-Party Funding

Attempts to fund customer accounts using payment instruments that do not belong to the verified account holder.

Identity Manipulation

Use of false, stolen, or synthetic identities.

AML Controls

To mitigate these risks, Red Lane B.V. applies:

- Full Customer Due Diligence;
- Enhanced Due Diligence for high-risk customers;
- Source of Funds verification;
- Source of Wealth verification;
- Real-time transaction monitoring;
- Ongoing sanctions screening;
- PEP screening;
- Adverse media screening;
- Suspicious Transaction Reporting procedures.

3. Georgia – Jurisdictional Risk Assessment

3.1 Operational Risk Assessment

Georgia is relevant to the Company due to the location of key operational and compliance personnel.

The Company has identified the following operational risks:

- Dependence on key individuals;
- Cross-border management arrangements;
- Cybersecurity threats;
- Data protection risks;
- Business continuity risks.

Mitigation Measures

The Company has implemented:

- Segregation of duties;
- Dual authorization requirements;
- Secure remote access controls;
- Multi-factor authentication;
- Business continuity procedures;
- Disaster recovery arrangements;

- Documented governance framework.

3.2 Financial Crime Risk Assessment – Georgia

The Company recognizes the importance of ensuring that all transactions involving Georgia remain transparent and fully traceable.

The Company therefore applies:

- Enhanced review of cross-border transactions;
- Verification of counterparties;
- Payment channel monitoring;
- Ongoing transaction surveillance.

4. Legitimate Movement of Monies

4.1 General Principles

Red Lane B.V. permits only legitimate, transparent, and traceable movement of funds.

The Company does not permit:

- Anonymous funding;
- Cash deposits;
- Third-party payments;
- Unverified payment methods;
- Transfers to unrelated third parties.

4.2 Controls for Incoming Funds

Before funds are accepted, the following controls apply:

Customer Verification

Every customer must successfully complete:

- Identity verification;
- Age verification;
- Address verification;
- Payment method verification.

Payment Verification

Deposits are accepted only where:

- The payment method belongs to the verified customer;
- The payment source is traceable;
- The payment method has passed AML screening.

Transaction Screening

Transactions are screened against:

- Sanctions lists;
- Internal watchlists;
- AML monitoring rules;
- Fraud detection systems.

4.3 Controls for Outgoing Funds

Prior to withdrawal processing:

- Customer identity is reconfirmed where required;
- Transaction history is reviewed;
- Source of Funds assessments are completed where applicable;
- AML monitoring alerts are reviewed;
- Any suspicious activity is escalated to the MLRO.

Withdrawals are paid only to verified payment instruments controlled by the customer.

5. Banking Channels and Payment Service Providers

The Company utilizes regulated financial institutions and payment providers that have been subjected to internal due diligence procedures.

Current payment methods include:

Card Payments

- Visa
- Mastercard

Banking Channels

- Regulated bank transfer services

Cryptocurrency Payments

- Bitcoin (BTC)
- Ethereum (ETH)
- USDT

5.1 Payment Provider Due Diligence

Before onboarding a payment provider, Red Lane B.V. conducts:

- Licensing verification;
- Regulatory review;
- AML framework assessment;
- Sanctions compliance review;
- Reputation assessment;
- Operational resilience assessment.

Annual reviews are conducted thereafter.

6. Verification of Fund Legitimacy

The Company applies a layered control framework.

Source of Funds Verification

Where required, customers must provide:

- Bank statements;
- Payslips;
- Tax returns;
- Business ownership records;
- Sale agreements;
- Inheritance documentation.

Source of Wealth Verification

For higher-risk customers:

- Wealth accumulation history is reviewed;
- Asset ownership is verified;
- Business ownership structures are assessed.

7. Enhanced Monitoring for Turkey and Georgia

Because Turkey and Georgia are considered higher-risk jurisdictions within the Company's risk assessment framework, additional monitoring controls apply.

These include:

Enhanced Transaction Monitoring

Monitoring for:

- Large transactions;
- Rapid fund movement;
- Structuring indicators;

- Third-party payment attempts;
- Unusual betting patterns.

Enhanced Account Reviews

Higher-risk accounts are reviewed more frequently.

Enhanced MLRO Oversight

All high-risk alerts are escalated directly to the MLRO.

8. Diversification Strategy

Customer Diversification

The Company seeks to reduce dependency on any single customer segment by expanding customer acquisition across multiple risk categories and customer profiles.

Geographic Diversification

While Turkey currently represents the primary target market, the Company intends to evaluate additional jurisdictions in the future following legal, compliance, and commercial assessments.

Payment Diversification

The Company avoids excessive dependency on any single payment provider by maintaining alternative payment arrangements where available.

Banking Diversification

The Company seeks to maintain relationships with multiple reputable financial institutions where commercially feasible.

Operational Diversification

Critical business functions are documented and capable of being performed by multiple authorized personnel to reduce key-person dependency.

9. Ongoing Review and Governance

The MLRO and senior management review Turkey and Georgia risk assessments at least annually and whenever:

- Regulatory changes occur;
- Payment arrangements change;
- New products are introduced;
- New jurisdictions are targeted;
- Significant AML/CFT risks emerge.

Risk assessments are documented and presented to senior management for review and approval.

10. Conclusion

Red Lane B.V. maintains a comprehensive jurisdictional risk management framework addressing legal, regulatory, AML/CFT/CPF, operational, sanctions, financial crime, reputational, and payment-processing risks associated with Turkey and Georgia. The Company employs enhanced due diligence, transaction monitoring, sanctions screening, source of funds verification, payment provider due diligence, and diversification strategies to ensure that all funds moving into and out of these jurisdictions are legitimate, transparent, traceable, and fully compliant with applicable regulatory obligations.