

## Anti Money Laundering Policy

**Approving Official:** Ivan Georgiev Sinitchiyski, AML Officer

**Effective Date:** 13.11.2025 | **Review Date:** 13.11.2026

## Anti Money Laundering Policy

### The Risk-based Approach

The primary goal of the Ywin and Betjordan's anti-money laundering policy is to protect the organization against money laundering and to ensure that Ywin and Betjordan is in full compliance with relevant laws and regulations.

Based on the FATF Recommendations, in its day-to-day business activities Ywin and Betjordan applies a risk-based approach when designing policies, procedures and controls to combat money laundering, financing of terrorism and financing of proliferation of weapons. Where the risks are higher enhanced measures are taken by Ywin and Betjordan. Where the risks are lower it may take simplified measures, provided that this is consistent with the country's assessment of its money laundering/financing of terrorism risks.

When applying the risk-based approach Ywin and Betjordan:

Assesses the risks that money laundering or terrorist financing may occur within its organization beforehand;

Designs and implements appropriate policies, procedures and controls to manage and mitigate the

identified and assessed risks;

Monitor and improve the effective operation of these policies, procedures and controls;

Documents its risk assessments, including everything that has been done and the reason for this being done.

The risk assessment considers all relevant risk factors, including the player, countries or geographic areas, products and services (types of games of chance) that Ywin and Betjordan offers and delivery channels, before determining what the level of overall risk is. Based on the risk assessment, the appropriate level and type of mitigation to be applied is determined. Ywin and Betjordan also takes notice of the outcomes of the national risk assessment of the jurisdictions where it operates and takes these outcomes into account when conducting its own risk assessment.

Since risks are dynamic, Ywin and Betjordan, on an on-going basis, monitors the effective operation of its policies, procedures and controls concerning its risk-based approach and, when and if needed, makes the necessary amendments to the policies, procedures and controls.

The Business and Customer Risk Assessments

### **Business Risk Assessment (BRA)**

Ywin and Betjordan carries out a business risk assessment to identify the ML/TF risks they are exposed to and ensure that the policies, controls and procedures adopted are adequate to prevent and mitigate those risks. Ywin and Betjordan and Betjordan's risk assessment addresses the ways in which its products and services could be used to launder money, finance terrorism and finance proliferation, and the extent of the risk that this will happen. The special consideration is given to the type of customers, products and services offered, delivery channels and geographical risk factors including outcomes and recommendations of the national risk assessments. Once the business risk has been assessed, Ywin and Betjordan sets a risk appetite: it decides how much risk it is prepared to accept. Ywin and Betjordan revises its business risk assessment whenever there are changes to the environment within which it is operating and within its business activities.

In the absence of changes, Ywin and Betjordan assesses its business risk at least once a year, to evaluate whether any changes thereto are necessary. Ywin and Betjordan and Betjordan's risk assessment is documented and approved by its Board of directors.

### **Customer Risk Assessment (CRA)**

The customer specific risk assessment is carried out by Ywin and Betjordan either prior to the carrying out of an occasional transaction, or during establishing a business relationship. It is possible that this initial customer specific risk assessment will have to be revised at a later stage of the business relationship and this may result in a customer's risk rating having to be adjusted.

The Customer Risk Assessment will assess the particular risks Ywin and Betjordan will be exposed to when providing its services or products. The information collected to draw up the CRA will formulate the customer's risk profile. On the basis of the CRA, the proper level of CDD can then be applied as stipulated in the Customer Acceptance Policy (CAP).

CAP includes:

a description of the type of players that are likely to pose a higher than average risk of ML/FT/FP;

the risk indicators presenting low, medium or high risk;

the level of Customer Due Diligence (CDD) measures, including ongoing monitoring, to be applied;

the circumstances under which service to someone is declined.

Policies, procedures and controls to mitigate ML/FT/FP include:

## **1. Customer Due Diligence (CDD);**

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## **2. Record keeping procedures;**

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## **3. Reporting procedures;**

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## **4. Risk management measures including Customer Acceptance Policies (CAP), Customer Risk Assessment (CRA) procedures, internal control, compliance management and communications of such policies, procedures and controls, employee training and employee screening policies and procedures.**

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### Customer Due Diligence

It's prohibited from keeping anonymous accounts or accounts in obviously fictitious names. Ywin and Betjordan must always identify the player and ask for the player's name and other relevant information to determine the purpose and nature of the business relationship. The customer's risk profile is essential to allow Ywin and Betjordan to apply a certain level of Customer Due Diligence commensurate to the identified ML/TF risk. The purpose of collecting information is to provide Ywin and Betjordan with documentation to assess the risk that may be associated with the player and to build a customer profile to assess how the player is going to act within the framework of the business relationship.

Customer Due Diligence measures (CDD) shall be undertaken when:

players engage in financial transactions equal to or above Naf. 4,000;

carrying out occasional transactions above the monetary equivalent of Naf. 4,000;

there is a suspicion of money laundering or terrorist financing; or

Ywin and Betjordan has doubts about the veracity or adequacy of previously obtained customer identification data.

Ywin and Betjordan shall always undertake CDD when a player executes a series of linked transactions which, though individually below the applicable threshold, would cumulatively meet or exceed the NAF. 4,000 threshold. In this context Ywin and Betjordan has to identify the player, carry out a customer risk assessment and verify the identity of the player. Whenever an occasional transaction presents a high risk of ML/TF, the enhanced due diligence measures must be applied.

## **CDD measures**

The CDD measures to be taken are as follows:

- a. Identifying the player and verifying that customer's identity using reliable, independent source

documents, data or information;

- b. Identifying the beneficial owner, and taking reasonable measures to verify the identity of the

beneficial owner, such that Ywin and Betjordan is satisfied that it knows who the beneficial owner is. For legal persons and legal arrangements this should include understanding the ownership and control structure of the customer;

- c. Understanding and, as appropriate, obtaining information on the purpose and intended nature of the business relationship;
- d. Conducting ongoing due diligence on the business relationship and scrutiny of transactions undertaken throughout the course of that relationship to ensure that the transactions being conducted are consistent with the Ywin and Betjordan and Betjordan's knowledge of the player, its business and risk profile, including, where necessary, its source of funds.

## Identification and verification of the player

Identification refers to the collection of personal details of the player to establish the identity of the player. Verification consists of confirming the personal details collected for identification purposes using reliable, independent source documents, data or information.

### 1. Identification of the player.

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When identifying the player, Ywin and Betjordan collect at a minimum the following information:

- i. full name;
- ii. permanent residential address;
- iii. date of birth;
- iv. place of birth;
- v. nationality; and
- vi. identity number.

In low-risk scenarios Ywin and Betjordan may limit identification to the three personal details set out in (i) to (iii) above. In high risk situations, Ywin and Betjordan may consider the collection of additional personal details as necessary to mitigate the higher risk of ML/FT.

### 2. Carry out a Customer Risk Assessment

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The purpose of the exercise is to have sufficient information available to detect unusual activity in the course of the business relationship. At this stage, a provisional risk rating will be assigned to a customer based on the initially collected information. This is revised once questions are answered or additional information received.

### **3. Verification of an identity refers to actions taken to verify that a person exists and is who he claims to be. This is done by checking reliable, independent (of the person whose identity is being verified) sources.**

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As a rule, verification of identity is carried out by Ywin and Betjordan making reference to an unexpired government-issued document containing photographic evidence of the customer's identity (e.g. passport, identity card). Where such a document does not allow verification of the player's residential address, Ywin and Betjordan can obtain other documents like a bank statement, utility bill, letter from a public authority or rental agreement, which should not be more than six months old, to verify the residential address.

Ywin and Betjordan can also contact the player by letter, e-mail or telephone to verify the information supplied. It can also send a verification code to the e-mail address to verify that the address is current and genuine. Verification can also be done by checking social media, telephone directories, companies' registries or media and news sources. Biometric checks can also be used to confirm that the individual providing the document is the one described therein. There are also circumstances in which Ywin and Betjordan is able to cross reference the information in its possession with geo-location information, IP address data, funding method data etc.

The documents presented shall be clear, legible and of good quality. Verification of evidence of identity implies a check whether the document presented is legitimate and that it has not been stolen from the true owner. If Ywin and Betjordan obtains foreign documentation, extra care is taken with regard to verifying its authenticity, particularly when the type of document is unfamiliar.

When Ywin and Betjordan does not have sufficient comfort that it knows its player, the additional measures are taken, such as requesting additional identification documents, asking the player to provide a photo of himself holding the ID, requiring a first payment through an account held in a reputable jurisdiction, using systems which generate codes for transmission to customers through a verified mobile phone and requiring it to be returned.

## **4. Sanctions screening and PEP (politically exposed persons) status screening.**

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Ywin and Betjordan shall screen all players against sanctions lists of the UN and EU. If and when Curaçao publishes a local list with designated persons and organizations, Ywin and Betjordan also takes that local list into account. Ywin and Betjordan does not do business with customers that are subject to international sanctions. Before doing business or performing an occasional transaction for the first time with a player, Ywin and Betjordan checks published lists of known or suspected terrorists or other sanctioned persons or companies through:

UN Sanctions List <https://main.un.org/securitycouncil/en/content/un-sc-consolidated-list>

EU Sanctions List <http://www.sanctionsmap.eu/#/main;>

For PEP status Ywin and Betjordan relies on internet search or consult reports and databases on corruption risk, like the Transparency International Corruption Perceptions Index, or on [www.knowyourcountry.com](http://www.knowyourcountry.com). For local PEPs, the PEP Caribbean list is consulted.

In relation to foreign PEPs, whether being customers or beneficial owners, in addition to performing normal customer due diligence measures, Ywin and Betjordan:

- a. has appropriate risk-management systems in place to determine whether the customer or the beneficial owner is a politically exposed person;
- b. obtains senior management approval to service the PEP (for establishing the business relationship for new customers, continuing the business relationship for existing customers or for conducting the occasional transaction);
- c. takes reasonable measures to establish the source of wealth and the source of funds;
- d. conducts enhanced ongoing monitoring of the business relationship.

Ywin and Betjordan takes reasonable measures to determine whether a customer is a domestic PEP or a person who is or has been entrusted with a prominent function by an international organization. Although stricter customer due diligence is required for each PEP, this customer due diligence does not have to be the same for every PEP. The customer due diligence measures for each PEP are tailored to the risk of the PEP, with the following being taken into consideration:

- the type of public function of the PEP;

- the country from which the PEP originates;
- the transactions that the PEP carries out.

The requirements for all types of PEPs should also apply to family members or close associates of such PEPs.

Screening for PEP status has to be carried out at on-boarding as indicated above. In addition, Ywin and Betjordan regularly screens for PEP status during the business relationship. Should a player who had not been identified as a PEP at on-boarding stage become one, Ywin and Betjordan implements the measures described above within the thirty-day window of observing that the person is a PEP. Failing with these, shall result in Ywin and Betjordan terminating the relationship with this customer.

#### Identification and verification of the Beneficial Owner (if applicable)

Ywin and Betjordan in general is required to identify and verify the identity of the beneficial owner. As a rule, Ywin and Betjordan makes sure that customers are registering an account to play and transact on their behalf. This is achieved by including specific wording in the terms and conditions that a registering player must explicitly accept, together with a declaration in the form of a tick box that a player is registering to play on his/her own behalf.

Ywin and Betjordan has to ensure that their ongoing procedures allow for the detection of possible instances where the player is actually playing on behalf of third parties. In such circumstances, where the funds being wagered are collected from multiple persons who will eventually share in any winnings, the particular transaction will not only be considered as having been undertaken by the customer but undertaken also for the benefit of those persons providing the necessary funding. These persons would be considered as beneficial owners and Ywin and Betjordan would therefore have to identify them and verify their identities.

If the Ywin and Betjordan and Betjordan's business model includes registered player accounts used by companies (corporate accounts) as a means to hedge matchbook exposure, together with business models such as the physical establishments to extend customer reach, the applicable beneficial ownership requirement relates to the beneficial owners of the companies/operators registering those accounts.

Ywin and Betjordan is furthermore required to distinguish between an ordinary gaming account belonging to a consumer, and such other accounts being of a different nature. In case of business participants Ywin and Betjordan must obtain satisfactory evidence to identify these business

participants. It has to take reasonable steps to verify the identity of the beneficial owner, using information or data that was obtained from a reliable source. At the minimum identification information, verification and evidence must be gathered for all persons holding 25% or more of the shares or voting rights or a person who otherwise exercises ultimate effective control of the customer. Where no natural person is identified as mentioned above, the natural person who holds the position of senior managing official should be identified.

#### Obtaining information on the Purpose and Intended Nature of the Business Relationship

This CDD measure requires the development of a customer risk profile to have sufficient information available to allow the detection of unusual activity in the course of a business relationship. To this end, Ywin and Betjordan collects sufficient information and, where it is necessary, documentation to establish a customer's source of wealth and expected level of activity, including determining the activities which generate the customer's net worth and whether this justifies the projected and actual level of account activity. Where the risk is not high, a declaration from the customer with some details (e.g. nature of employment/business, usual annual salary etc.) can be sufficient. Social media can also be used as a source of information. However, where the risk of ML/FT is higher or Ywin and Betjordan has doubts as to the veracity of the information collected, the information obtained would need to be substantiated by independent and reliable information and documentation. It may include using statistical data (data collected from the Central Statistics Department such as average national income, average disposable income etc) to develop behavioral models against which to eventually gauge customer's activity rather than collect source of wealth information.

#### On-Going Monitoring

Ywin and Betjordan conducts ongoing due diligence on the business relationship with its customers and scrutinize the transactions undertaken throughout the course of that relationship to ensure that they are consistent with Ywin and Betjordan and Betjordan's knowledge of the customer, the customer's business and risk profile.

## 1. Ongoing monitoring of identity

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In conducting ongoing due diligence on the business relationship Ywin and Betjordan holds accurate and up to date identification data of its customers. Since identity may change due to circumstances, Ywin and Betjordan obtains evidence of identity periodically to detect any changes, refresh the data on key events (i.e. change of payment instrument), as well as considers

tracking expiry dates on evidence of identity and refreshing it when expiring. Ywin and Betjordan always determines on a risk-sensitive basis whether changes are substantial as to require re-assessment of customer risk of the business relationship.

## **2. Ongoing monitoring of transactions**

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While performing ongoing scrutiny of transactions Ywin and Betjordan notices that a customer's transactions are not consistent with what it knows or expects from the customer, questions this unusual activity and, where necessary, establishes the source of the funds used for these transactions. The reason for above inconsistency may be deviation, amongst others, from the source of funds or average profile or account activity noted to date). Ywin and Betjordan scrutinizes the reason for this deviation and obtains sufficient information and documentation with regard to the transaction. This also may lead to revision of the customer's risk profile. Based on the above Ywin and Betjordan decides whether the transaction is an unusual transaction and need to be reported to the FIU. As with anything else, the level of on-going monitoring will depend on the risk profile of the customer, but even in low-risk situations Ywin and Betjordan applies a degree of oversight to ensure that the business relationship still has to be considered as a low-risk one.

### **Timing of CDD Measures**

Ywin and Betjordan conducts verification of identity when engaging in financial transactions equal to or in excess of Naf. 4,000. However, Ywin and Betjordan also applies a minimum level of CDD measures prior to reaching the threshold. Thus, simultaneously with the opening of an account, Ywin and Betjordan identifies the customer by collecting the minimum personal details, being: name and surname, permanent residential address and date of birth (set as the minimum requirements in case of low-risk business relationships) and conduct the PEP status screening and sanctions screening. The threshold is to be calculated on a daily basis taking into account all deposits and withdrawals made by the player since the establishment of the business relationship, including any peer-to-peer transfers. Once the threshold is reached, Ywin and Betjordan carries out a customer risk assessment and meet their remaining CDD obligations as indicated herein.

In carrying out the CDD measures, customers may be allowed to continue using their gaming account while Ywin and Betjordan obtains any necessary information from the customer concerned. However, if the Naf. 4,000 threshold is reached because of a deposit of the player, he

cannot further deposit funds into the account or withdraw funds from the account. He still will be able to play, using the funds already in his account. However, if the Naf. 4,000 threshold is reached because the customer wants to withdraw his money, a complete freezing of the account should occur. In this case it will not be possible for the customer to continue playing. If the requested information and documentation is not received within 30 days from the moment the Naf. 4,000 threshold was reached, Ywin and Betjordan terminates the relationship with the player and report the transaction to the FIU if a presumption of money laundering or terrorist financing exists. If no presumption of money laundering exists, the funds should be transferred to the same bank account or wallet it was deposited from.

## **Enhanced Due Diligence**

A risk-based approach should be applied, implying more thorough checks should be performed for higher risk customers. The Enhanced Due Diligence (EDD) measures should be consistent with the risks identified. Ywin and Betjordan increases the degree and nature of monitoring of the business relationship, in order to determine whether transactions or activities appear unusual. Enhanced Due Diligence has to be conducted where the risks of money laundering or terrorist financing are higher.

This concerns among others:

Residents of higher risk geographic areas;

Political Exposed Persons (PEP's);

Products or transactions that might favor anonymity;

New products and new business practices, including new delivery mechanism, and the use of new or developing technologies for both new and pre-existing products.

Enhanced due diligence measures include:

Obtaining additional information on the customer, like occupation, previous address and information available through public databases, internet, etc.;

Obtaining additional information on the intended nature of the business relationship;

Obtaining information on the source of funds or source of wealth of the player.

Obtaining information on the reasons for intended or performed transactions;

Obtaining the approval of senior management to commence or continue the business relationship;

Conducting enhanced monitoring of the business relationship;

Requiring the first payment to be carried out through an account in the customer's name with a bank subject to similar CDD standards.

In situations presenting a higher risk of ML/TF, source of funds information is requested from time to time even though there may not be any change in pattern or activity conducted by the customer.

## **Simplified Due Diligence**

Where the risks of money laundering or terrorist financing are lower, Ywin and Betjordan conducts simplified CDD measures, which should take the nature of the lower risk into account.

Measures which may be applied:

Not collecting specific information. If the risk assessment undertaken indicates a low risk of money laundering or terrorist financing, then Ywin and Betjordan obtains the player's identity only. In this case Ywin and Betjordan may limit identification to the first three personal details in the "Identification of the player" clause.

Verifying the identity of the customer and the beneficial owner after the establishment of the business relationship;

Adapting verification to perceived risk. The extent of verification may also vary depending on the risk posed by the particular business relationship. In a low-risk situation, Ywin and Betjordan can also use alternative reputable information sources, even where these do not contain photographic evidence of the player's identity (e.g. birth certificates, bank statements etc.);

Limiting the extent of personal details to be verified. In low-risk situations, Ywin and Betjordan can verify the basic identification details, while the verification of any other personal details is to the discretion of Ywin and Betjordan, as long as it has sufficient comfort that it knows who its customer is;

Reducing the frequency of customer identification updates;

Reducing the degree of on-going monitoring and scrutinizing transactions, based on a reasonable monetary threshold.

Simplified CDD measures are not acceptable whenever there is suspicion of money laundering or terrorist financing, or where specific higher-risk scenarios apply.

## **The termination of the business relationship**

In case the obligations arising from the customer due diligence cannot be met, Ywin and Betjordan cannot establish the business relation or perform the transaction and is obliged to terminate the business relationship with the customer. Ywin and Betjordan also keeps a record of all the attempts made to get the necessary information and documentation. To this end, Ywin and Betjordan may decide to either close the account or to keep it blocked and suspended in its entirety.

In the event that the customer makes the requested information and/or documentation available to Ywin and Betjordan following the closure or the suspension and blocking of the gaming account, Ywin and Betjordan considers whether the delay in providing the requested CDD documentation and/or information affects the risk of ML/FT associated with the given business relationship. Ywin and Betjordan considers whether there are any grounds giving rise to suspicion of ML/TF/FP. The reluctance of the customer to provide CDD on its own should not be automatically equated to a suspicion of ML/TF/FP. If, however the presumption of ML/FT/FP exists Ywin and Betjordan should submit an unusual transaction report to the FIU with regard to this player. Where there is no reason for the retention of funds, the funds are to be remitted back to the player. This has to be done through the same channels used to receive the funds.

Reporting of unusual transactions

## **Reporting obligations**

Ywin and Betjordan has adequate procedures in place that cover:

- a) The recognition of unusual transactions;
- b) The documentation of unusual transactions; and
- c) The reporting of unusual transactions.

## **Recognition of unusual transactions.**

An unusual transaction is a transaction inconsistent with the player's profile. Ywin and Betjordan provides its staff with specific guidance and training in recognizing and adequately documenting unusual transactions. All these unusual transactions are reported to the compliance officer in the format approved by management and reported to FIU.

The following transactions or intended transactions are deemed unusual:

- a. Transactions which in connection with money laundering or terrorism financing are reported to the Police or to the Department of Justice;
- b. Transactions by or on behalf of a natural or legal person, a group or an entity, who is named on a list, adopted by virtue of the Sanctions National Ordinance (N.G. 2014 no. 55);
- c. Transactions in the amount of NAf. 5,000 or more, regardless whether the transaction is made in cash, by check or other form of payment, or through electronic or other non-physical means.

This includes but is not limited to:

A cashless transaction in the amount of NAf. 5,000 or more.

A cashless transaction is a transfer from a bank account of Ywin and Betjordan to a local or international bank account, at the request of the client.

Accepting or releasing a deposit in the amount of NAf. 5,000 or more at the request of the client;

Sale to a customer of chips in the amount of NAf. 5,000 or more. "Chips" include but is not limited to tokens and credits.

A cash out in the amount of NAf. 5,000 or more;

Note: A transaction may be a single transaction, but may also be a series, combination or pattern of transactions involving a total amount of the monetary equivalent of NAf. 5,000 or more and is considered per gaming day.

- d. Presumed money laundering transactions or terrorist financing: transactions where there is cause to presume that they can be related to money laundering or terrorist financing.

## Reporting of unusual transactions

By virtue of article 11 of the NORUT, Ywin and Betjordan must report unusual transaction or any intended unusual transaction to the FIU without delay. In order to do this, it has clear procedures for internal and external reporting of unusual transactions in place. These is communicated to its personnel. All unusual individual transactions or series of transactions, as mentioned above must be reported internally, without any delay. Also supporting documents must be submitted as part of the reporting.

## The documentation of unusual transactions

Ywin and Betjordan registers with the FIU and to obtain access to the goAML reporting portal after validation by the FIU. The FIU allows bulk reporting, therefore the casino account manager at the FIU should be contacted in order for the FIU to determine if the operator qualifies for this service. The compliance officer must prepare a report of all unusual transactions for external reporting to the FIU according to the reporting regulations of the FIU. Ywin and Betjordan shall report to the FIU the details of these transactions by means of the go AML reporting portal. The reports and the submission of the thereto related information (all supporting documents) should be done in English. Ywin and Betjordan and its directors, officers and employees are protected by law from criminal and civil liability for breach of any restriction on disclosure of information when reporting to the FIU.

## Prohibition of disclosure

Ywin and Betjordan and its senior management and employees shall not disclose any details or information in connection with a report filed to the FIU or a request for information made by the FIU. They are not permitted to disclose information to the customer nor to third parties. The reason for this is not to jeopardize an analysis or investigation into Money laundering or Terrorist financing.

## Record Keeping

Ywin and Betjordan maintains, for at least five years, all necessary records on transactions (both domestic and international), to comply with information requests from the competent authorities. Such records must be sufficient to permit reconstruction of individual transactions (including the amounts and types of currency involved, if any) so as to provide, if necessary, evidence for prosecution of criminal activity.

All records obtained through CDD measures (e.g. copies or records of official identification documents like passports, identity cards, driving licenses or similar documents), account files and business correspondence must be kept for at least five years after the business relationship is ended, or after the date of the occasional transaction. The CDD information and the transaction records should be available to domestic competent authorities based upon appropriate legal authority.

## **Annex 1: Definitions**

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CFATF - the Caribbean Financial Action Taskforce. an organization of twenty-four (24) states of the

Caribbean Basin, Central and South America, which have agreed to implement common countermeasures to address money laundering.

Compliance Officer - a senior officer at management level and independent from the games' operations,

responsible for the detection and deterrence of money laundering and terrorist financing.

FATF - the Financial Action Task Force. An independent intergovernmental body, established in 1989 and mandated by its Member Jurisdictions to develop and promote policies to protect the global financial system against money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction.

FATF Recommendations - a framework of recommendations on policies and measures, issued by the FATF, to combat money laundering, terrorist financing and the financing of proliferation of weapons of mass destruction.

Financial Transactions - In online casinos, financial transactions are deposits and withdrawals (bonusses are not included). Amounts wagered and winnings are considered as gambling transactions. Gambling transactions are not considered as financial transactions.

FIU - the Financial Intelligence Unit Curaçao, referred to in art. 2 of the NORUT.

Kingdom Sanctions Act - the National Ordinance also known as the "Rijkssanctiewet", published under N.G. 2016 no. 54.

ML/FT/FP - the Regulations for combating Money Laundering, the Financing of Terrorism and Proliferation of weapons of Mass Destruction - are an integral part of the land-based and the online gambling license requirements for the Curaçao jurisdiction.

NAF - Netherlands Antilles florin (an old name for a guilder), a currency used in Curacao.

NOIS - National Ordinance on Identification of Clients when rendering Services (Landsverordening

identificatie bij dienstverlening, N.G. 2017, no. 92).

NORUT - National Ordinance on the Reporting of Unusual Transactions (Landsverordening Melding

Ongebruikelijke Transacties, N.G. 2017, no. 99).

Politically Exposed Persons (PEPs) - Foreign PEPs are individuals who are or have been entrusted with prominent public functions by a foreign country and the direct family members or close associates of such persons. Domestic PEPs are individuals who are or have been entrusted domestically with prominent public functions, for example Heads of State or of government, senior politicians, senior government, judicial or military officials, senior executives of state owned corporations, important political party officials. Persons who are or have been entrusted with a prominent function by an international organization refers to members of senior management, i.e. directors, deputy directors and members of the board or equivalent functions.

Sanctions National Ordinance - the National Ordinance also known as the “Sanctielandsverordening”, published under N.G. 2014 no. 55.

Source of Funds - refers to how the funds for a particular transaction were obtained by the player, like personal savings, pension release, property sales, share sales and dividends, gambling winnings, gifts,

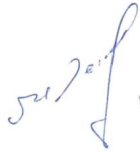
compensation from legal rulings.

Source of Wealth - source of wealth is the origin of all the money a person has accumulated over their lifetime, like employment income, inheritances, investments, business ownership interests.

Unusual transaction - a transaction that is considered as such on the basis of certain indicators, pursuant to Article 10 of the NORUT.

(Ultimate) beneficial ownership (UBO) - refers to the natural person(s) who ultimately own(s) or control(s) a customer and/or the person on whose behalf a transaction is being conducted. It also incorporates those persons who exercise ultimate effective control over a legal person.

Ywin and Betjordan – a trading name of Y Enterprises B.V., a private limited liability company registered in Curacao.



**Signature:**

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**Name:** Ivan Georgiev Sinitchiyski

**Role:** AML Officer (including Money Laundering Reporting Officer function)

**Date:** 13.11.2025