

Assets Segregation Policy

- CONFIDENTIAL –

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<u>User Types</u>
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1. Purpose and Scope

This policy establishes clear rules for the segregation of assets - between Fortuna Games N.V. and its players - to ensure transparency, protection of player funds, and compliance with regulatory requirements. It applies to all assets owned or managed by the company, including operational funds and any player funds that may be held in the future. The policy also includes internal controls to prevent commingling of assets and mitigate risks associated with non-compliance with AML (Anti-Money Laundering) and CFT (Counter Financing of Terrorism) regulations.

2. Definitions

Company Assets: All funds and resources owned or managed by Fortuna Games N.V. for its operational activities, including, but not limited to, cash reserves, investments, and other financial instruments. These funds are maintained in accounts strictly for company purposes.

Player Assets: In the event that Fortuna Games N.V. holds any funds on behalf of players in the future. Such assets will be segregated and maintained in designated accounts to ensure they are entirely distinct from the company's operational assets.

Segregation of Assets: The process of maintaining separate and distinct accounts for operational and player funds to ensure transparency, regulatory compliance, and prevent the commingling of funds.

AML/CFT Compliance: Adherence to Anti-Money Laundering (AML) and Counter Financing of Terrorism (CFT) regulations to ensure the legality and legitimacy of all financial activities conducted by Fortuna Games N.V.

Player Risk Matrix: A structured framework for categorizing players based on their risk profile (Low, Medium, High, or Prohibited) to ensure appropriate compliance measures are applied.

3. Policy Principles

Fortuna Games N.V. is committed to the strict segregation of its operational assets and player assets. Operational assets - including cash reserves, investments, and financial instruments - will be held in dedicated accounts exclusively for the company's operational purposes. Should the company hold player funds in the future, these will be strictly separated from operational funds through the establishment of specially designated accounts. To ensure compliance, the company will implement robust internal monitoring mechanisms, safeguarding player interests and adhering to AML/CFT requirements.

4. Operational Measures

To ensure proper segregation of assets, Fortuna Games N.V. employs a structured approach:

- **Account Structure:** Separate bank accounts are maintained for operational activities and player funds. Each account is clearly labeled to reflect its purpose.
- **Daily Reconciliation:** All accounts are reconciled daily to confirm balance accuracy and compliance with company obligations. Discrepancies are escalated immediately to the MLRO (Money Laundering Reporting Officer).
- **Internal Controls:** Strict internal controls monitor the flow of funds between accounts, including limiting account access and enforcing regular audits.
- **Record-Keeping:** Detailed records of all transactions - specifying the source of funds, type of transaction, and final recipient - are maintained to ensure transparency and compliance during audits.

5. Risk Assessment and Management

Fortuna Games N.V. applies a structured risk-based approach to manage player relationships effectively, categorizing them based on risk levels - Low, Medium, High, or Prohibited. This ensures the appropriate level of due diligence for each category.

Risk Rating	Nature	Location	Source of Funds/Wealth	Transaction Size
Low	Individual;	Countries fully compliant with FATF; No AML/CFT concerns;	Bank transfer Debit or credit card; Approved payment service provider;	Under any of the qualifying payment thresholds;
Medium	Public profile raises some form	Countries named on FATF's List B;	Use of vouchers, prepaid card;	Deposits or withdrawals of

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	or concern e.g. adverse media, social media activity;	Countries which on opinion of MRLO represents heightened risk;	Where the method of withdrawal differs to the original deposit; Use of over three different payment methods;	over €3,000(or currency equivalent) or aggregate in excess of €3,000 (or currency equivalent) in any 30-day period;
High	PEPs; Any individuals or entities subject to the warranties;	Countries named on FATF's Black List; Countries with AML/CFT strategic difficulties; Professional gambler; Customers that are sporting professionals betting on sports; High net worth individuals;	Use of over five payment methods;	Deposits or withdrawals of €10,000 in any period;
Prohibited;	Sanctioned individuals/entities; A customer that has triggered any of the above qualifiers to become high or medium risk but	Closed jurisdictions; A customer that has triggered any of the above qualifiers to become high or	Cash; A customer that has triggered any of the above qualifiers to become high or medium risk but	A customer that has breached any of the above thresholds but does not comply with the Company's CDD/

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	does not comply with the Company's CDD/EDD requirements; Anyone deemed to be linked with the financing of terrorism; Business participant;	medium risk but does not comply with the Company's CDD/EDD Requirements;	does not comply with the Company's CDD/EDD requirements; Funds appear to be generated or linked with proceeds of crime;	EDD requirements;
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- Low-Risk Players: Subject to standard checks, using simple payment methods within qualifying thresholds.
- Medium-Risk Players: Require enhanced monitoring due to public profile risks or transaction complexity.
- High-Risk Players: Undergo additional due diligence measures due to high-risk jurisdictions or regulatory warnings.
- Prohibited Players: Excluded from services, including sanctioned entities or those linked to illegal activities.

Fortuna Games N.V. ensures a comprehensive review of all transactions and player profiles to minimize risks and maintain compliance with AML/CFT standards.

6. General Responsibilities

The successful implementation and maintenance of the Assets Segregation Policy rely on clear roles and responsibilities within Fortuna Games N.V., as well as regular reviews to ensure ongoing compliance with regulatory requirements.

- **Money Laundering Reporting Officer (MLRO):**

The MLRO holds primary responsibility for overseeing the implementation of the policy and ensuring compliance with all relevant AML/CFT regulations. This includes supervising the segregation of operational and player funds, conducting investigations into any discrepancies or irregularities, and coordinating with regulatory bodies when required. The MLRO is also tasked with approving policy updates, ensuring they align with current legislation and internal risk management strategies.

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Additionally, the MLRO provides training and guidance to relevant employees on adhering to the policy.

- **Policy Review:**

This policy is reviewed to ensure its relevance and effectiveness. Reviews are conducted whenever there are significant changes in regulatory requirements, operational processes, or the company's risk environment. The MLRO leads the review process to ensure all aspects of the policy remain current and comprehensive. Any updates are communicated promptly to all relevant stakeholders.

This structured approach ensures that all parties involved understand their roles and responsibilities, promoting a robust and compliant framework for managing both operational and player funds.

7. Acknowledgment by MLRO

This policy has been reviewed and approved by:

Mr. Igor Basistii

Money Laundering Reporting Officer (MLRO)

Date: 09.12.2024

Signature:

