

KYC & KYB Process of WP Consulting N.V.

For Players and Partners on Weplay Network

KYC Policy Version: Last updated on October 16, 2024

1. Introduction

WP Consulting N.V. is committed to maintaining the highest standards of security, regulatory compliance, and responsible gaming. This Know Your Customer (KYC) and Know Your Business (KYB) Policy outlines the procedures for verifying the identity of our players and partners, preventing fraud, ensuring compliance with the general legal framework, confirming the legitimacy of corporate entities, identifying ownership, assessing financial stability, adhering to anti-money laundering (AML) laws, and promoting responsible gaming.

This policy applies to all players registering and transacting on our platform and all business partners, including vendors and clients.

2. KYC and KYB Objectives

KYC Objectives for Players:

- Verify the identity of players and prevent fraudulent activities
- Ensure compliance with anti-money laundering (AML) and counter-terrorist financing (CTF) regulations.
- Protect players from identity theft and financial crimes.
- Promote responsible gaming and prevent underage gambling.

KYC Objectives for Business Partners:

- Verify the identity of individual business owners or representatives.
- Ensure compliance with anti-money laundering (AML) and counter-terrorism financing (CTF) regulations.
- Reduce risks related to fraud, identity theft, and financial crimes.

KYB Objectives for Business Partners:

- Confirm the legitimacy of corporate entities, including their registration and operational status.
- Require verification of company ownership, structure, and ultimate beneficial owners (UBOs).
- Screen against global watchlists, sanctions, and politically exposed persons (PEPs).
- Assess financial stability and the source of funds for transactions.

Why It Matters?

- Prevents financial and reputational risks.
- Ensures compliance with international regulatory frameworks.
- Strengthens trust between business partners by verifying authenticity.
- Helps detect and prevent illicit financial activities.

3. KYC Verification Levels & Requirements

Level 1 – Players: Basic Registration (Upon Account Creation)

- Required Information:
 - Full Name
 - Date of Birth
 - Residential Address
 - Email & Phone Number Verification
- Limitations:
 - Restricted deposit & withdrawal limits
 - Limited access to features until further verification
 - Restricted Geolocation

Level 2 – Players: Identity Verification (Before First Withdrawal or Exceeding Deposit Limits)

- Required Documents:
 - Government-Issued ID (Passport, Driver’s License, or National ID)
 - Proof of Address (Utility Bill, Bank Statement, or Government Correspondence – not older than 3 months)
 - Selfie Verification (if required)
- Benefits:
 - Increased deposit & withdrawal limits
 - Access to full platform features

Level 3 – Players: Enhanced Due Diligence (EDD) (For High-Value Transactions or Risk-Based Review)

- Additional Verification Documents:
 - Proof of Source of Funds (Bank Statement, Payslip, Investment Records, or Crypto Transactions)
 - Proof of Source of Wealth (Business Ownership, Inheritance, or Financial Statements)
 - Sanction list screening (global and national watchlists and sanctions lists, including OFAC, UN, HMT, EU, and DFAT)
 - Politically Exposed Person Screening (using public and proprietary databases)
 - Live Video Verification (if required)
- Required for:
 - High-rollers & VIP players
 - Players engaging in large or unusual transactions

Level B1 – Partners: Individual

- Required Documents and Verifications
 - Government-Issued ID (Passport, National ID, or Driver’s License)
 - Proof of Address (Utility Bill, Bank Statement, or Government Correspondence – not older than 3 months)
 - Tax Identification Number (TIN) or Equivalent Tax Registration Document
 - Proof of Source of Funds (Recent Bank Statement, Payslip, or Other Financial Records)
 - Sanction List and Politically Exposed Person (PEP) Screening Results
 - Live Video Verification (if required)

Level B2 – Partners: Legal Entity

- Company Registration Documents:
 - Certificate of Incorporation
 - Memorandum & Articles of Association (or equivalent governing documents)
 - Business License or Trade License
 - Gambling License Certificate
- Ownership & Structure Verification:
 - Shareholder/UBO (Ultimate Beneficial Owner) Register
 - List of Directors and Key Management Personnel
 - Organizational Structure Chart (if applicable)
- Identity Verification for UBOs & Directors:
 - Government-Issued ID (Passport, National ID, or Driver's License)
 - Proof of Address (Utility Bill, Bank Statement, or Government Correspondence – not older than 3 months)
- Financial & Tax Documents:
 - Recent Bank Statements
 - Tax Identification Number (TIN) and Tax Registration Certificate
 - Audited Financial Statements (if required)
- AML & Compliance Documentation:
 - Anti-Money Laundering (AML) Policy (if applicable)
 - Politically Exposed Person (PEP) & Sanctions Screening Results
 - Proof of Source of Funds & Source of Wealth (for high-risk entities)
- Business Operations Proof:
 - Proof of Business Address (Lease Agreement, Utility Bill, or Bank Statement)
 - Recent Invoices or Contracts with Clients/Suppliers

Ongoing Monitoring & Compliance Checks

- Continuous transaction monitoring
- Periodic re-verification of identity for compliance purposes
- Reporting of suspicious transactions to relevant authorities
- Responsible gaming checks & intervention

4. Verification Timeline

- Players
 - Players must complete Level 2 KYC verification before making their first withdrawal.
 - Requested documents must be submitted within 7 days of notification, or the account may be restricted.
 - Failure to comply with KYC requirements may result in account suspension, transaction freezes, or closure.
- Partners
 - To ensure an efficient and compliant KYB process, all business partners must submit the required documentation within 10 business days from the date of the initial request.
 - WP Consulting N.V. will conduct a review within 5 business days upon receiving a complete set of documents.
 - If additional verification is required, the partner will be notified, and the process may be extended accordingly.
 - Failure to provide necessary documents within the specified timeline may result in a delay or denial of partnership approval.

5. Data Protection & Confidentiality

All player and partners information and documents collected during the KYC and KYB process are stored securely and handled in compliance with:

- EU Directive 2015/849 on ML prevention,
- EU Regulation 2015/847 on information accompanying fund transfers,
- Various EU regulations imposing sanctions and restrictions,
- BE Law of 18 September 2017 on cash use limitation and ML prevention.

Data will only be shared with regulatory bodies if required by law.

6. Fraud Prevention & AML Compliance

- Transactions are monitored for suspicious activities (e.g., unusual deposit/withdrawal patterns).
- If suspicious activity is detected, WP Consulting N.V. reserves the right to request additional documentation and report findings to regulatory authorities.
- Player Accounts involved in fraudulent activities, money laundering, or policy violations may be suspended or permanently closed.
- Contract with Partners involved in fraudulent activities, money laundering, or policy violations may be terminated.

7. Underage & Responsible Gaming Policy

- Players must be 18+ years old (or the legal gambling age in their jurisdiction).
- Underage accounts will be immediately closed, and any funds forfeited.
- Responsible gaming checks will be conducted to detect potential gambling addiction, with intervention measures in place.

8. Policy Updates & Compliance

This policy is subject to periodic review to ensure compliance with evolving regulations. Players will be notified of any significant updates.

9. Contact Us

For questions regarding our AML and KYC Policy:

- General inquiries: support@weplay.network
- Complaints: kyc.aml@weplay.network

WP Consulting N.V.

By: Mitja Javornik, Director

Signature: 

Addendum 1

Deposit and Withdrawal Limits for Players

Deposit KYC L1	Maximum daily deposit value (in USD)	Maximum weekly deposit value (in USD)	Maximum Monthly deposit value (in USD)
USD/ USDT(TRC20)	<200	<200	<1.000

Cash-out KYC L1	Maximum daily withdrawal value (in USD)	Maximum weekly withdrawal value (in USD)	Maximum monthly withdrawal value (in USD)
USD/ USDT(TRC20)	0	0	0

Deposit KYC L2	Maximum daily deposit value (in USD)	Maximum weekly deposit value (in USD)	Maximum Monthly deposit value (in USD)
USD/ USDT(TRC20)	<2.000	<5.000	<10.000

Cash-out KYC L2	Maximum daily withdrawal value (in USD)	Maximum weekly withdrawal value (in USD)	Maximum monthly withdrawal value (in USD)
USD/ USDT(TRC20)	<2.000	<5.000	<10.000

Deposit KYC L3	Maximum daily deposit value (in USD)	Maximum weekly deposit value (in USD)	Maximum Monthly deposit value (in USD)
USD/ USDT(TRC20)	>2.000	>5.000	>10.000

Cash-out KYC L3	Maximum daily withdrawal value (in USD)	Maximum weekly withdrawal value (in USD)	Maximum monthly withdrawal value (in USD)
USD/ USDT(TRC20)	>2.000	>5.000	>10.000

Addendum 2

KYC Backoffice Process Flow adhered by Weplay Network for Players

Level 1 KYC – Fresh Registered Player

Basic Registration KYC Form Filled with. Player remaining unverified. Restrict change of Country, Email, first Name, Last Name, Address, DOB, Zip, City Fields filled during registration process.

☐ Verified
 ☐ Reset Password
 ☐ Test User

Email Address

User Level

player x

Level 2 KYC – First Withdrawal or Exceeding Deposit Limits

Passport & POE Gates Open / request users documents to enable withdrawals and exceed basic deposit limits. Following Initiate Document Request / send manual request Bo will show requested and pending file return.

– Verification

Passport	Choose file	Document requested (2022/09/29 23:26:21)
Registration	Choose file	Request Document
Utility Bill	Choose file	Request Document
Other	Choose file	Request Document

TBC validation process, Unknown email detail / document capture features?

If any validation option on receipt

☒ Verified (2022/10/11 18:30:47)
 ☐ Reset Password
 ☐ Test User

Email Address

leo.oxbury@outlook.com

User Level

player x

Level 3 KYC – EDD for VIP and High Roller Players

Funds & Other documents requested via BO to raise limits. Document collection to be verified per pending document capture feature. Following Validation of extra documents user level moves to member.

Special Limit Exemption by Management must be obtained for players requesting limits higher than Member states. All VIP deposits and withdrawals to be approved by senior management only.

☒ Verified (2022/10/11 18:30:47)

☐ Reset Password

☐ Test User

Email Address

leo.oxbury@outlook.com

User Level

member



Addendum 3

KYC/KYB Form for Partners

Customer's Data

Please fill out the form with true and correct information.

#	Particulars	Details			
1	Legal Status (tick ✓)	Individual	Company	Partnership	Other
2	IN CASE OF A LEGAL ENTITY (COMPANY, PARTNERSHIP etc.)				
(a)	Name of the Company				
(b)	Date of Incorporation				
(c)	Country of Incorporation				
(d)	Registration Address				
(f)	Registration No.				
(g)	Tax No.				
(h)	Country of activity				
(i)	Name of Director(s) (indicate the authorized signatory)				
	Residential Address				
	Passport and ID Number				
(j)	Name of UBO(s) (with shares equal to or higher than 10%)				
	% of shares held				
	Residential Address				
	Passport or ID number				
(k)	Are any of the Directors and/or UBOs a Politically Exposed Person (PEP)?	YES / NO			
	If YES indicate the person				
(l)	If a Holding Company, name other subsidiaries/ branches	YES / NO			

3	IN CASE OF AN INDIVIDUAL (SOLE ENTREPRENEUR)	
(a)	Full Name	
(b)	Residential Address (including country)	
(c)	Passport and ID Number	
(c)	Occupation or Profession	
(d)	Name of Establishment or Employer (if any)	
(e)	Location of activity	
(f)	Is the Individual a Politically Exposed Person (PEP)?	YES / NO
(g)	Is the Customer acting on behalf of another Person?	YES / NO
	IF YES Indicate on whose behalf and provide appropriate documentation	
4	BUSINESS ACTIVITY INFORMATION (both for individual and Company)	
(a)	What is the principal business/activity of the Customer?	
(b)	If business activities are conducted in more than one country, please indicate all the countries	
(c)	Regulatory Status	Regulated / Unregulated
(d)	Name of Regulator/Jurisdiction	
(e)	License Number	
(f)	If not, indicate estimated date:	
5	BANK DETAILS (Both Individual and Company)	
(a)	Beneficiary Name	
(b)	Beneficiary Account	
(c)	Bank Name	
(d)	Bank Address	
(e)	SWIFT	
(f)	Crypto (Currency, Crypto Network, Wallet Address)	

6	CONTACT DETAILS (Both Individual and Company)	
(i)	Contact Person Name	
(ii)	Function	
(iii)	Phone	
(iv)	E-mail/website	
(v)	Postal Address	

THE LIST OF REQUIRED KYC DOCUMENTS

Please submit copies* of the documents in pdf. All the documents have to be in English, translated by a certified translator:

- (i) For a Company:
 - Company Registration Documents:
 - Certificate of Incorporation
 - Memorandum & Articles of Association (or equivalent governing documents)
 - Business License or Trade License
 - Gambling License Certificate
 - Ownership & Structure Verification:
 - Shareholder/UBO (Ultimate Beneficial Owner) Register
 - List of Directors and Key Management Personnel
 - Organizational Structure Chart (if applicable)
 - Identity Verification for UBOs & Directors:
 - Government-Issued ID (Passport, National ID, or Driver's License)
 - Proof of Address (Utility Bill, Bank Statement, or Government Correspondence – not older than 3 months)
 - Financial & Tax Documents:
 - Recent Bank Statements
 - Tax Identification Number (TIN) and Tax Registration Certificate
 - Audited Financial Statements (if required)
 - AML & Compliance Documentation:
 - Anti-Money Laundering (AML) Policy (if applicable)
 - Politically Exposed Person (PEP) & Sanctions Screening Results
 - Proof of Source of Funds & Source of Wealth (for high-risk entities)
 - Business Operations Proof:
 - Proof of Business Address (Lease Agreement, Utility Bill, or Bank Statement)
 - Recent Invoices or Contracts with Clients/Suppliers
- (ii) For Individual (sole entrepreneur):
 - Required Documents and Verifications
 - Government-Issued ID (Passport, National ID, or Driver's License)

- Proof of Address (Utility Bill, Bank Statement, or Government Correspondence – not older than 3 months)
 - Tax Identification Number (TIN) or Equivalent Tax Registration Document
 - Proof of Source of Funds (Recent Bank Statement, Payslip, or Other Financial Records)
 - Sanction List and Politically Exposed Person (PEP) Screening Results
 - Live Video Verification (if required)
- (iii) For Partnership: Certificate of Registration Partnership Deed, List & Passport copies of Authorized Signatories, List & Proof of Domicile Country** of Partners
- (iv) For Trust: Certificate of Registration Trust Deed, List & Passport copies of Settlor, Trustees, Protector, List & Passport copies of Authorized Signatories, List of Major Beneficiaries
- (v) For Any other Legal Person: Registration Document, List & Passport copies of Authorized Signatories, List of the Individuals/Entities who ultimately owns, or exercises effective control over such person

Declaration:

I/We hereby confirm that the above information provided to you is true and correct to the best of our knowledge. I/We acknowledge that if the information provided is found to be false or misleading then the business relationship may be annulled anytime at your discretion. I/We hereby agree to provide any additional information/documentation that may be required.

Date: _____

Signature of Authorized Signatory

*Certified copies of the documents must be clearly signed, stamped and dated by any of the following:

- (1) A representative of an embassy, consulate or high commission of the country; or
- (2) A lawyer or attorney; or
- (3) A notary public or commissioner of oaths; or
- (4) A chartered or certified accountant.

Copies of certified copies are not acceptable.

Addendum 4

PEP Form

Politically exposed person (PEP) declaration form

1	APPLICANT INFORMATION	
(i)	Full Name	
(ii)	Date of Birth (DD/MM/YYYY)	
(iii)	Nationality	
(iv)	Residential Address	
(v)	Phone Number	
(vi)	Email Address	
(vii)	Occupation / Position	
(iix)	Employer/Organization	
2	PEP DECLARATION	
A Politically Exposed Person (PEP) is an individual who holds or has held a prominent public function, as well as their immediate family members and close associates. This includes, but is not limited to, heads of state/government, senior politicians, senior government officials, judicial or military officials, senior executives of state-owned corporations, and important political party officials.		
(i)	Are you, or have you ever been, a Politically Exposed Person (PEP)?	
	YES	NO
(ii)	Are you an immediate family member or close associate of a PEP? (Spouse, partner, child, parent, close business associate, etc.)	
	YES	NO
If you answered YES to any of the above, please provide details:		
(iii)	Position Held	
(iv)	Country	
(v)	Duration (from – to)	
(vi)	Relationship to PEP (if applicable)	
3	SOURCE OF FUNDS/WEALTH	
Please indicate the source(s) of your wealth and funds:		
(i)	Salary/Employment Income	
(ii)	Business Income	
(iii)	Investments (Real Estate, Stocks, etc.)	
(iv)	Inheritance/Gift	
(v)	Other (please specify)	
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Declaration:

I, the undersigned, declare that the information provided in this form is true, complete, and accurate to the best of my knowledge. I understand that providing false or misleading information may result in legal and regulatory consequences.

Date: _____

Signature of Authorized Signatory

Addendum 5

SOW Form

Source of wealth (sow) declaration form

1	APPLICANT INFORMATION	
(i)	Full Name	
(ii)	Date of Birth (DD/MM/YYYY)	
(iii)	Nationality	
(iv)	Residential Address	
(v)	Phone Number	
(vi)	Email Address	
(vii)	Occupation / Position	
(iix)	Employer/Organization	
2	SOURCE OF WEALTH DECLARATION	
In accordance with applicable anti-money laundering (AML) and counter-terrorism financing (CTF) regulations, individuals engaging in financial transactions are required to declare their Source of Wealth (SOW).		
Please select the primary source(s) of your wealth and provide relevant details:		
(i)	Employment Income	
	Employer Name	a. b. c. d.
	Position Held	a. b. c. d.
	Years of Employment	a. b. c. d.
	Average Gross Annual Income	a. b. c. d.

(ii)	Business Ownership/Profits	
	Business Name	a. b. c. d.
	Industry	a. b. c. d.
	Date of Establishment	a. b. c. d.
	Average Annual Profit After Tax	a. b. c. d.
(iii)	Investments (Real Estate, Stocks, Bonds, etc.)	
	Type of Investment	a. b. c. d.
	Value of Investment	a. b. c. d.
	Date of Acquisition	a. b. c. d.
(iv)	Investments (Real Estate, Stocks, Bonds, etc.)	
	Type of Investment	a. b. c. d.
	Value of Investment	a. b. c. d.
	Date of Acquisition	a. b. c. d.

(v)	Inheritance	
	Name of Benefactor and Relationship	a. b. c. d.
	Gross Value of Inheritance	a. b. c. d.
	Date of Receipt	a. b. c. d.
(vi)	Gift	
	Name of Donor and Relationship	a. b. c. d.
	Gross Value of Gift	a. b. c. d.
	Date of Receipt	a. b. c. d.
(vii)	Sale of Assets	
	Type of Asset Sold	a. b. c. d.
	Sale Value	a. b. c. d.
	Date of Sale	a. b. c. d.

(iix)	Other	
	Specify	a. b. c. d.
	Additional Details	a. b. c. d.

Supporting documentation:

Please attach relevant supporting documents (e.g., paystips, tax returns, business registration documents, investment portfolio statements, inheritance records, etc.).

Declaration:

I, the undersigned, confirm that the information provided in this form is true, complete, and accurate to the best of my knowledge. I acknowledge that providing false or misleading information may result in legal and regulatory consequences.

Date: _____

Signature of Authorized Signatory

Addendum 6

Final KYC/KYB Process Summary Report for Individuals

1	APPLICANT INFORMATION					
(i)	Full Name					
(ii)	Date of Birth (DD/MM/YYYY)					
(iii)	Nationality					
(iv)	Residential Address					
(v)	Phone Number					
(vi)	Email Address					
(vii)	Occupation / Position					
(ix)	Employer/Organization					
2	DOCUMENT VERIFICATION STATUS					
Document/Verification	Submitted Date	Issue Date	Validity Date	Description	Validity Status	Compliance Result
Government-Issued ID						
Proof of Address						
Tax Identification Number (TIN)						
Proof of Source of Funds						
Sanctions/PEP Screening Results						
Live Video Verification (if required)						
Final Compliance Result						

Compliance Officer Confirmation:

I, the undersigned, confirm that the KYC/KYB process has been reviewed, and the compliance result is as follows: _____

Compliance Officer Name: _____

Signature: _____

Date: _____

Applicant Confirmation:

I, the undersigned, confirm that I have submitted the required KYC/KYB documents and understand the compliance results:

Applicant Name: _____

Signature: _____

Date: _____

Final KYC/KYB Process Summary Report for Legal Entities

1	APPLICANT INFORMATION						
(i)	Full Name						
(ii)	Date of Birth (DD/MM/YYYY)						
(iii)	Nationality						
(iv)	Residential Address						
(v)	Phone Number						
(vi)	Email Address						
(vii)	Occupation / Position						
(iix)	Employer/Organization						
2	DOCUMENT VERIFICATION STATUS						
	Document/Verification	Submitted Date	Issue Date	Validity Date	Description	Validity Status	Compliance Result
	Certificate of Incorporation						
	Memorandum & Articles of Association						
	Business/Trade License						
	Gambling License Certificate (if applicable)						
	Shareholder/UBO Register						
	List of Directors & Key Management						
	Organizational Structure Chart						
	Government-Issued ID (UBO/Directors)						
	Proof of Address (UBO/Directors)						
	Recent Bank Statements						
	Tax Registration Certificate						
	Audited Financial Statements (if required)						
	AML Policy (if applicable)						
	PEP & Sanctions Screening Results						
	Proof of Source of Funds/Wealth						

Document/Verification	Submitted Date	Issue Date	Validity Date	Description	Validity Status	Compliance Result
Proof of Business Address						
Recent Invoices/Contracts						
Final Compliance Result						

Compliance Officer Confirmation:

I, the undersigned, confirm that the KYC/KYB process has been reviewed, and the compliance result is as follows: _____

Compliance Officer Name: _____

Signature: _____

Date: _____

Applicant Confirmation:

I, the undersigned, confirm that I have submitted the required KYC/KYB documents and understand the compliance results: _____

Applicant Name: _____

Signature: _____

Date: _____