

AML POLICY

To comply with applicable rules, regulations and international standards, the Company has established procedures to which it adheres when providing services to Account Holders. These procedures include the following standards:

- Customer Due Diligence
- Know Your Customer
- Due Diligence
- The Money Laundering Reporting Officer
- Risk Management
- Risk Classification
- Monitoring of Account Holder Activities
- Reporting of unusual transactions
- Record Keeping

Risk Management

Risk Classification

The Company takes a risk-based approach with respect to its customers to effectively detect and deter any risks to which it may be exposed, such as money laundering, terrorist financing or other prohibited transactions such as fraud.

The company's risk classification is as follows.

- Low Risk
- High Risk

Low Risk

All players are classified as low risk and are subject to standard due diligence procedures in relation to the request for KYC documentation as per the process described above and ongoing monitoring of account activity.

High Risk

Player activity is the determining factor in classifying a player as high risk. Any player from whom an automated alert has been generated or inappropriate activity has been detected will be categorized as High Risk and will be subject to enhanced due diligence. The instances in which a high-risk classification is assigned include, but are not limited to, the following

- Customer Due Diligence
- Know Your Customer (KYC)
- Identification & Verification

According to international standards and local laws, it is imperative for a company to know its customers. Sound KYC policies and procedures are critical to protecting the safety and soundness of a company and the financial system. Accordingly, the Company has adopted the following procedures:

Request for KYC Information

An individual may not participate in a game for money unless that individual has registered and been provided with a Player Account. Only one Player Account is allowed per person, per family and per shared environment. To be registered as a Player, an individual must personally register and provide the following KYC information:

- a. Date of birth along with valid identification showing that he/she is over eighteen (18) years of age or the legal age of majority in his/her jurisdiction of residence. Identification that must be provided includes a copy of a valid passport, a copy of another form of identification, and proof of address.
- b. Player's first and last name.

c. Player's complete residential address.

d. Player's valid email address.

e. Payment information; and

f. Username and Password.

Upon registration, a geographic location check is performed on the applicant's computer IP to ensure that the person is in a permitted jurisdiction. If the applicant is not in a permitted jurisdiction, he/she will not be allowed to proceed with the registration process. The Company will verify the information provided and may request additional documentation to verify the information provided. The Player Account may be placed on hold pending receipt of satisfactory information or may be terminated if the Company determines that the information contained in the Player Account is false or misleading.

The Company reserves the right to refuse to open or close a player account at its sole discretion after reviewing the KYC information provided.

Login Details

It is not permitted for a Player to share his/her login details to access the system with a third party. The Company reserves the right to cancel a player's account without refund if the login details have been disclosed to a third party.

Due Diligence

Standard Due Diligence

The Company will request the following information to verify the player's identity:

- A valid driver's license or passport
- A recent copy of a utility bill or bank statement.

Standard due diligence will be conducted in the following instances:

- At any time during player registration
- Upon a withdrawal request
- Upon reaching a cumulative withdrawal threshold of €2,000 or equivalent.
- At any time at the Company's discretion.

The Company also reserves the right to conduct a telephone verification of the Player's account in order to verify the details provided by the Player at the time of registration or at any other time requested by the Company. Such information may include, but is not limited to, the registered Player Account holder's name, home address, email address, telephone number, photo identification, payment methods, wager types, amounts and event details. Failure to satisfactorily complete such verification due to the fact that the details previously provided are forged, false, incorrect, misleading, non-existent, do not belong to the Player or cannot be verified, may result in the Company closing the Player's account and confiscating any winnings.

Enhanced Due Diligence

In certain specific cases, the Company will conduct enhanced due diligence by requesting the following KYC information:

1. Driver's license or valid passport
2. A selfie of the player holding the identification document
3. A recent utility bill or bank statement
4. A bank statement showing the initial deposit
5. A bank statement no older than 3 months from the bank where a withdrawal is to be made
6. Information regarding the source of the funds. Enhanced Due Diligence will be applied once a Player is deemed to be High Risk, including but not limited

to the following situations and as further discussed in the section entitled "Monitoring of Account Holder Activities":

- a) if the Player is a citizen of a high-risk country, or if the geographic location check at onboarding indicates that the Player resides in a non-reputable or high-risk jurisdiction
- b) if it is suspected that a Player is attempting to create or has created multiple Player Accounts in multiple different names
- c) if it is suspected that Player(s) is part of a syndicate of Players colluding to gain an advantage over the Company
- d) if it is suspected that the Player is a politically exposed person (PEP)
- e) upon the discovery of any irregular, suspicious, improper, or fraudulent activity
- f) at any time in the Company's sole discretion

If the Company is not able to verify the identity of the Player based on the provided documentation and further efforts, the Company reserves the right to put the Player Account on hold pending the provision of verification information, or to terminate the account if it finds the information contained in the Player Account to be false or misleading.

The Money Laundering Reporting Officer (MLRO)

The Company has appointed an MLRO who is responsible for reviewing KYC information and monitoring player account activity. Specifically, the MLRO is responsible for the following:

- Ensuring proper staff review of Player Accounts with respect to the identification and verification of an Account Holder
- Maintaining a list of registered account holders
- Oversee the review and investigation of player account activity by designated personnel
- Provide initial and ongoing training to all relevant personnel to ensure awareness of their personal responsibilities and procedures with respect to

player identification, monitoring player activity, record keeping and reporting of unusual/suspicious transactions

- Cooperate with all relevant administrative, law enforcement and judicial authorities in their efforts to prevent and detect criminal activity
- Ensure that this Policy is adhered to, reviewed and maintained on a regular basis. instances as set forth in the section below entitled "Surveillance of Account Holder Activities".

Monitoring Account Holder Activities

Designated personnel will conduct the review and monitoring of Player Accounts and will conduct further investigations if irregular activity is detected. Security technology is in place to generate automated alerts, which are then thoroughly investigated by the department.

The presence of any irregular, suspicious, inappropriate, or fraudulent activity, or any attempt to do so, will result in the player being classified as a high-risk player for which EDD procedures will be implemented.

Player accounts will be reviewed and monitored for the presence of any of the following situations:

- The provision of fake, false, incorrect, misleading, non-existent KYC information that does not belong to the player or cannot be verified
- The provision of fictitious names such that the true beneficial owner is not known
- The detection of inappropriate gaming and/or fraudulent activity
- Detect irregular player activity, including placing zero risk or even bets
- Complex or large transactions or groups of transactions which, by their nature, are likely to be related to money laundering or terrorist financing
- Where it is suspected that a player is attempting to create or has created multiple player accounts in multiple different names.
- If Player(s) are suspected of belonging to a syndicate of Players colluding to gain an advantage over the Company.
- Upon the discovery of any irregular, suspicious, improper, or fraudulent activity

- At any time, at the Company's sole discretion, for any of the following reasons
- Any fraudulent or unlawful use of the System by a Player who attempts to hack into or otherwise circumvent the security measures in place on the System.
- Use of any software program that incorporates artificial intelligence
- Any attempt to login from a nontrusted or high-risk jurisdiction.

Special attention is given to the following cases:

- Multiple Accounts

Only one Player Account is allowed per person, family, or shared environment. If more than one Player Account is created per person, house, building, mailing address, phone number, IP address, family, device, or shared environment, all related Player Accounts will be closed. No winnings, refunds or deposits will be paid. Family includes, but is not limited to, parents, partners, spouses, children, siblings, and close relatives.

If it is suspected that multiple player accounts have been created in different names, or that a player account is part of a syndicate of players colluding to gain an advantage over the Company, the Company will suspend all suspicious player accounts pending an investigation. The investigation will consist of reviewing game history, IP location history, including VPN and proxy databases, and measures to delay ratios commonly displayed by computer sharing technology. If, upon investigation, the Company determines that an Account Holder or group of Account Holders have created multiple Accounts and are playing as part of a syndicate of Players, the Company will withhold any cash or bonus winnings and reserves the right to withhold any deposited funds.

Whenever an Account Holder requests a withdrawal from his/her account, the system will check for the existence of multiple accounts and whether the Account Holder has used a false proxy. If multiple accounts are found, all accounts will be closed, and the Account Holder will not be allowed to open a new account.

- Unusual activity

If an Account Holder has unusual deposits and is flagged by the system, the Company will investigate and the Account Holder may be asked to provide further information. The Company will suspend the

account pending further documentation. If the account holder has not provided satisfactory information within 30 days, the account will be closed. The MLRO will report the unusual transaction to the appropriate authorities.

- Withdrawal or Payment of Funds

The Company has established the following procedures for withdrawals or disbursements of funds.

Request for Withdrawal

Withdrawal requests must be made from a Player Account. Withdrawal requests sent by any other means of communication will not be processed. Upon receipt of a withdrawal request, the Company will request KYC documentation to verify the identity of the Player. The Company will not credit withdrawn funds to any other source from which they originated. If, for any reason, this is no longer possible, the Company will request additional verification documentation to substantiate the details and ownership of the new withdrawal method. Transfers or withdrawals will only be made to the player. Transfers to third parties are not permitted.

Prior review of account activity

Prior to processing any withdrawals, the Company will conduct an additional review of the Player's account for irregular activity, such as money laundering or suspicious game play, such as

- Deposits without wagering or only to receive free spins. A player must always wager at least the amount of his/her deposit before being allowed to withdraw any funds
- Creating multiple accounts using different names
- Collusion between players.

Upon the occurrence of any of the above, the Company may elect to withhold funds and request further documentation from the EDD, or conduct further investigation and decide to

- Suspend the Player's account pending receipt of sufficient verification information if any

- Immediately block a Player's access to the System or to their account and confiscate all funds held in the account

- Close or terminate a Player's account and confiscate all funds held in such account, followed by the reporting of such activity to the appropriate authorities, as further described below.

Cryptocurrency Transactions

Cryptocurrency transactions are only possible if the initial deposit was made with a cryptocurrency. After this transaction, all transactions (deposits, wagers, and withdrawals) with the player must be made using the same cryptocurrency as the initial deposit. The Company will at no time sell/buy/exchange cryptocurrency to and/or from FIAT currency. The Company is bound by the following requirements as set forth by the Master Licensee

- Collect and verify proof of identity and proof of address as described above in the "Customer Due Diligence" section and to ensure that a player is over 18 years of age

- Collect and store hardware KYC in all pathways of registration, login, deposits, and withdrawals, including but not limited to IP address, MAC address and browser information to ensure that all wagers, deposits and withdrawals are to/from the same Player (IP and computer)

- Provide the Master License Holder, upon request, with a proof of balance acceptable to the Master License Holder to ensure that the Player's funds have been deposited

- Provide proof of solvency to the Master License Holder on a regular basis (weekly, monthly) to ensure that the operator has sufficient funds to cover all bets and jackpots and that cryptocurrency is held in a separate account

- The Company will display the exchange rate of cryptocurrencies to FIAT currency on the home page of the Website. In no event shall the Company make exchanges between any cryptocurrency and any FIAT currency
- The Company must include in its terms and conditions and emphasize that the values of cryptocurrencies can change dramatically depending on the market value

It is important to note that due to current anti-money laundering regulations, the Player may only deposit money into the Player Account in order to play and use the Services. Similarly, the Player may only withdraw winnings and not the funds deposited into the Player Account. Players who make deposits and withdrawals without playing will have their funds frozen until further notice. The Company is not a financial institution and does not pay interest on deposits. In any case, the Company reserves the unlimited right to apply certain restrictions on payment methods in selected countries and/or for certain players.

Notification of new payment methods will be posted on the homepage of the Website and sent to Account holders by email as soon as they are added. For each new payment method, this manual and the terms and conditions on the Website will be updated accordingly.

Security Review

The Company reserves the right at any time to verify the identity, age and/or registration information provided by the Account Holder to verify the Customer's use of the Services provided, for any violation of the Terms and Conditions and any applicable laws. At the time of registration, the Applicant authorizes the Company to make any relevant inquiries regarding his person and to use and disclose information to any third party deemed necessary to conduct its verification checks. Third parties may be used to verify the age, identity, address, and payment information provided, to order a credit report and/or to verify the information provided by checking it against certain public or private databases. All Applicants/Account Holders are advised that by accepting the Company's Terms and Conditions, they consent to the use, recording and disclosure of the information provided, and that the data may be recorded by the Company or third parties engaged by the Company.

Auditing may be conducted from time to time at the Company's discretion and/or for regulatory, security or other business reasons,

During the screening, the Customer may be restricted from withdrawing funds from the Account and/or prevented from accessing certain services offered on the Website.

Reporting of Unusual Transactions

Any transaction or circumstance for which the Company has not received sufficient verification information and/or where the Company knows, suspects or has reason to suspect that any of the transaction(s), among other actions, (i) involves funds derived from illegal activities, (ii) is intended to conceal funds derived from illegal activities, or (iii) involves the use of the Company's system to facilitate criminal activity, may give rise to its reporting to the FIU in Curaçao. The Money Laundering Reporting Officer (MLRO) is responsible for reporting to the appropriate authority and will maintain a list of all instances where he or she has determined that it is not necessary to report. The decision not to report will be duly justified.

Record Keeping

The Company will maintain a record of all relevant documentation in a separate database for at least five years after the termination of a business relationship. The Company is required to maintain records in a manner that enables investigating authorities to establish a satisfactory audit trail for individual transactions, including amounts, currencies and nature of transactions.

In certain circumstances, where required by law and permitted by national law and the relevant authorities, the Company may provide copies of the records retained.

Employee Due Diligence

It is imperative that the Company's employees be of unquestioned integrity. To ensure this objective, the Company has a procedure whereby all applicants are required to submit a curriculum vitae, at least two references and relevant educational and/or professional certificates, which are reviewed and verified by the Company's Human Resources Department.

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