

AML/CTF/CPF POLICY

Encode Digital B.V. 158289

March 2025

Signature:

A handwritten signature in blue ink, appearing to be 'Jade Clarkson', written over a horizontal line.

Responsible Compliance Officer:

JADE CLARKSON

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Next Review: March 2026

1. INTRODUCTION

Encode Digital B.V. (Registration number 158289) ("We", "the Company", "our") is registered at 10, Schottegatweg Oost, Unit 1-9, Bon Bini Business Centre, Curacao on 16/08/2021. We've implemented a comprehensive AML/CTF/CPF Policy to proactively combat money laundering, terrorism financing, and proliferation risks. Aligned with both local and global regulatory standards, this policy ensures full legal compliance and provides a strong framework for managing risks across all client relationships

The Board of Directors (BoD) of the Company holds ultimate responsibility for approving, implementing, and supervising this AML/CTF/CPF Policy. Regular reviews are conducted annually, with updates implemented when significant regulatory or operational changes occur. In urgent cases, the designated officer may propose revisions based on findings from internal or external AML audits, with careful consideration of associated risks and impacts.

This policy is in strict adherence to the key objectives of Curaçao's AML/CTF/CPF legislative framework. This includes compliance with the National Ordinance for Games of Chance (LOK), the Criminal Code of Curaçao, the National Ordinance on Offshore Games of Hazard (NOOGH), the National Ordinance Penalization of Money Laundering (NOPML), the National Ordinance on the Reporting of Unusual Transactions (NORUT), and the National Ordinance on Identification when Rendering Services (NOIS), with all amendments effective as of May 16, 2024. Additionally, it adheres to the Sanctions National Ordinance (SNO) and the Kingdom Sanction Act.

Beyond national regulations, the Company's policy incorporates leading international standards and guidelines, including the Financial Action Task Force (FATF) Recommendations, the European Union's Anti-Money Laundering Directives (4th, 5th, and 6th AMLDs), and the Wolfsberg Principles.

The policy is explicitly crafted to meet the supervisory expectations of Curaçao's AML/CTF/CPF regulatory authority, the Curaçao Gaming Control Board. It is mandatory for all directors, officers, employees, and any external consultants engaged in auditing activities to adhere to the principles and procedures outlined in this policy.

D. EXPLORING THE iGAMING ECOSYSTEM

As per these regulatory requirements, the Company is prohibited from providing online gaming services in jurisdictions where such activities are restricted. Specifically, we do not offer or promote its services in the United States, Australia, the Dutch West Indies (including Aruba and Bonaire), Curaçao, France, Germany, the United Kingdom, Belize, and the Netherlands. By adhering to these restrictions, we ensure that our operations remain confined to regions where online gaming is legally permitted and actively avoids targeting or marketing to customers in prohibited jurisdictions. This demonstrates the Company's commitment to full compliance with applicable legal and regulatory obligations.

The online gaming and betting industry, including companies like ours operates in a dynamic environment with inherent risks associated with money laundering and financial crime. These risks include, but are not limited to:

1. **Identity Theft:** Criminals may use stolen identities or fraudulent accounts to conceal the origins of illicit funds and integrate them into legitimate financial systems through online gaming platforms.
2. **Fraudulent Activities:** Fraud may manifest in various forms, including credit card fraud, account hacking, or the use of synthetic identities to manipulate gaming systems and bypass safeguards.
3. **Structuring and Layering:** These techniques involve breaking down large amounts of illicit money into smaller, less conspicuous transactions or disguising the source of funds through multiple layers of transactions to evade detection.
4. **Collusion and Internal Threats:** Collusion between employees, customers, or third-party payment providers presents a significant risk. Malicious actors may work together to circumvent internal security protocols, enabling money laundering schemes to go undetected.
5. **Use of External Payment Providers:** Fraudulent activities can also involve external payment processors, e-wallets, or cryptocurrency platforms, which may be exploited to facilitate untraceable transfers of illicit funds.

Given the complexity of these risks, we have established robust policies and controls to identify, mitigate, and address potential vulnerabilities. The Company employs advanced monitoring systems, conducts thorough customer due diligence (CDD), and ensures ongoing transaction monitoring to detect unusual or suspicious activities. Additionally, employee training programs are implemented to enhance

awareness and equip staff with the skills to identify and respond effectively to financial crime risks.

By maintaining these stringent measures, we underscore our commitment to operating within a secure and compliant framework, safeguarding its customers, business reputation, and the broader integrity of the online gaming industry.

3. ASSESSMENT OF RISKS RELATED TO MONEY LAUNDERING, TERRORIST FINANCING AND PROLIFERATION FINANCING

3.1. Money Laundering

Money laundering is a central component of financially driven criminal activities, often involving complex schemes that span multiple jurisdictions. It facilitates a range of illegal activities, including but not limited to tax evasion, fraud, sanctions violations, corruption, illegal arms trading, drug trafficking, extortion, and human trafficking. The primary objective of money laundering is to obscure the illicit origins of criminal proceeds by concealing their identity, source, and destination, ultimately integrating them into the legitimate financial system.

The Key Stages of Money Laundering

Money laundering typically progresses through three distinct stages, each designed to make tracing illicit funds increasingly difficult:

1. Placement:

This initial phase involves introducing illegally obtained funds into the financial system. Common methods include depositing cash into bank accounts, purchasing high-value assets such as vehicles, jewellery, or real estate, or using other financial instruments to legitimize the money. The goal is to initiate the process of blending illicit funds with legal financial activities to reduce the risk of detection.

2. Layering:

At this stage, the focus shifts to creating a complex web of financial transactions to obscure the money's origins. Techniques include transferring funds across multiple accounts, jurisdictions, or financial institutions, converting them into different currencies, or investing in assets or financial products. This complexity is designed to break the audit trail, making it increasingly difficult for authorities to trace the funds back to their illegal source.

3. Integration:

In the final stage, the laundered funds are reintroduced into the legitimate economy. This is typically achieved through the purchase of luxury items,

investments in businesses, or participation in other lawful financial activities. By this point, the funds appear to be legitimate, significantly reducing the chances of detection and recovery.

Money laundering schemes can utilize any of these stages, and online gambling platforms are particularly vulnerable to exploitation due to their virtual nature, high transaction volumes, and international reach. To address these vulnerabilities, we avoid offering anonymous services and closely monitors for suspicious transactions.

Relation to Terrorist Financing (TF)

Terrorist financing, while distinct from money laundering, shares similar mechanisms for moving and disguising funds. These funds may originate from legitimate sources, such as donations or business operations, or from illegal activities like drug trafficking or extortion. Regardless of the source, terrorist financiers use methods resembling money laundering to integrate the funds into financial systems while masking their ultimate destination.

For example, prepaid cards are a common tool used by terrorists to acquire materials or fund operations while maintaining anonymity. Recognizing this overlap, we ensure that our staff remains informed about emerging trends in terrorist financing and receives regular training to identify and respond to suspicious activities effectively.

Risk Management and Compliance Measures

To mitigate risks related to money laundering and terrorist financing, we employ a proactive, multi-faceted risk management approach that includes:

1. **Verification of Customer Identity and Fraud Prevention:**
The Company conducts comprehensive customer due diligence (CDD), verifying the identity, age, and location of its customers through reliable documentation. Enhanced due diligence (EDD) is applied to high-risk customers, such as politically exposed persons (PEPs).
2. **Detection of High-Risk Transactions:**
The company actively monitors for unusual activities, such as the operation of multiple accounts by a single user or unusually large or frequent transaction volumes that may signal attempts at structuring or layering.
3. **Prevention of Illicit Deposits:**
The Company identifies and investigates funds suspected of originating from criminal activities or attempts to use the platform as a temporary holding space for such funds.
4. **Monitoring of Player-to-Player Transfers:**
Platforms that enable player-to-player transactions are particularly vulnerable to misuse for money laundering. We implement controls to detect

and prevent these activities, ensuring that funds are not transferred illicitly or cashed out without proper scrutiny.

5. Ongoing Risk Assessments and Training:

Recognizing that money laundering risks evolve constantly, the Company conducts regular, tailored risk assessments to address emerging threats.

Employees receive ongoing training to stay updated on AML compliance best practices, ensuring vigilance across all levels of the organization.

This approach enables us to proactively address existing and emerging threats, reinforcing its commitment to compliance and safeguarding the integrity of its operations and the broader financial ecosystem.

3.2. Terrorist Financing

Terrorist financing refers to the provision and management of funds to support terrorist activities, ranging from minor operations to large-scale attacks. These funds are indispensable for carrying out a variety of operations, including recruitment, training, procurement of weapons, and execution of attacks. The sources of such funds can stem from both legitimate and illegitimate activities, making their detection and prevention particularly challenging.

Sources of Terrorist Financing

1. Legal Sources:

Funds from legal sources often derive from legitimate businesses, charitable donations, and other lawful financial activities. Terrorists may exploit these channels by masking illicit intentions within routine transactions. For example, charitable organizations and fundraising efforts can be manipulated to redirect donations toward financing terrorist operations. Similarly, businesses may be used as fronts to generate and funnel funds under the guise of legitimate activities.

2. Illegal Sources:

Illegal sources of funds involve a broad spectrum of criminal activities, including drug trafficking, fraud, smuggling, extortion, and other organized crimes. These illicit gains are often laundered to obscure their origins before being used to support terrorist activities. This convergence of money laundering and terrorist financing underscores the need for vigilant financial oversight and regulatory compliance.

Methods of Transferring Funds

The transfer of funds for terrorist purposes occurs through both formal and informal channels, each presenting unique challenges:

1. Formal Channels:

Traditional banking systems and financial institutions are often used to transfer funds. Advanced money laundering techniques such as layering, structuring, and the use of shell accounts can disguise the origins and destinations of these transactions. Sophisticated technology and global connectivity further complicate the task of tracing funds within formal financial networks.

2. Informal Channels:

Informal methods, such as hawala systems and other alternative remittance networks, operate outside conventional banking frameworks. These systems rely on trust-based mechanisms and lack standardized documentation, making them difficult to monitor and regulate. Such informal networks are frequently exploited to transfer funds quickly and anonymously across borders.

Indicators of Terrorist Financing

Detecting terrorist financing often requires analysing unusual transaction patterns or behaviours that deviate from expected norms. Common red flags include:

- Large or frequent fund transfers to or from jurisdictions classified as high-risk or conflict zones.
- Transactions linked to individuals or entities associated with known terrorist organizations.
- Suspicious activities in high-risk industries, such as charitable organizations, where funds may be misappropriated.
- Large cash deposits or withdrawals that lack a clear business or personal justification.
- Financial activities that appear deliberately structured to obscure their true purpose or circumvent regulatory scrutiny.

Measures to Combat Terrorist Financing

The Company has established rigorous Anti-Money Laundering (AML) policies to address and mitigate the risks of terrorist financing. These policies focus on:

1. Customer Due Diligence (CDD):

Comprehensive procedures are in place to verify customer identities, assess the risk profile of clients, and ensure ongoing monitoring of their financial activities.

2. Transaction Monitoring:

Automated systems are employed to detect unusual or suspicious

transactions, with additional scrutiny applied to high-risk areas and individuals.

3. Sanctions Screening:

The Company adheres to multiple international sanctions lists to ensure compliance and prevent financial support for terrorist organizations. These lists include but are not limited to:

- o Sanctions National Ordinance (SNO)
- o Kingdom Sanction Act
- o Curaçao Gaming Control Board (GCB) announcements
- o Office of Foreign Assets Control (OFAC) and its Specially Designated Nationals (SDN) list
- o United Nations Security Council sanctions
- o European Union (EU) sanctions
- o United States Foreign Terrorist Organizations list

The Company actively uses these sanctions lists to screen transactions and ensure no financial interactions inadvertently support terrorism.

International Framework and Guidelines

Global efforts to combat terrorist financing are guided by international organizations and regulatory frameworks:

1. Financial Action Task Force (FATF):
The FATF provides a set of international standards and recommendations aimed at combating money laundering and terrorist financing. Its guidelines emphasize robust measures for identifying, reporting, and mitigating suspicious transactions.
2. Office of Foreign Assets Control (OFAC):
OFAC enforces U.S. economic and trade sanctions while maintaining the SDN list. This list identifies individuals and entities linked to terrorism and restricts their access to the financial system.
3. European Union (EU):
The EU enforces strict regulations to prevent the misuse of the financial system for terrorist purposes. Member states are required to implement effective AML measures and comply with international sanctions.
4. United Nations (UN):
The UN plays a pivotal role by imposing sanctions on entities and individuals linked to terrorism. Its global sanctions lists are critical in disrupting the financial networks of terrorist organizations and limiting their resources.

By implementing these measures and adhering to international best practices, we demonstrate our unwavering commitment to preventing terrorist financing and maintaining the integrity of its financial and operational systems. Continuous employee training and regular risk assessments further enhance the Company's ability to detect and address emerging threats effectively.

3.3. Proliferation Financing

We recognize the critical importance of addressing Proliferation Financing (PF), which involves the use of financial resources to support the development, acquisition, transfer, or delivery of weapons of mass destruction (WMD) and their associated delivery systems. In accordance with the updated Curaçao iGaming regulations, the Company has implemented robust measures to ensure its platform is not misused for PF-related activities. These measures include conducting thorough risk assessments to identify and mitigate PF risks, applying enhanced due diligence (EDD) to customers or transactions from high-risk jurisdictions, and monitoring for unusual transaction patterns linked to sanctioned entities or activities.

The Company adheres strictly to international sanctions regimes, including those enforced by the United Nations Security Council and the European Union, as well as Curaçao's national legislative requirements under the Sanctions National Ordinance (SNO) and the Kingdom Sanction Act. Transactions and counterparties are routinely screened against relevant sanctions lists to ensure compliance and prevent any financial interaction that could facilitate WMD proliferation. By integrating these controls into its AML compliance program, we underscore its commitment to global non-proliferation efforts while maintaining the integrity and security of its operations.

3.4. Risk-based Approach

A cornerstone of our risk-based approach (RBA) is the execution of a thorough and ongoing risk assessment process. This process involves systematically evaluating risks across multiple dimensions, including customer profiles, products, services, and geographic locations. These assessments are conducted regularly to ensure potential vulnerabilities are identified and mitigated effectively, in alignment with both regulatory requirements and best practices.

Key Risk Factors Assessed

1. Customer Risk:

We evaluate customer risk by examining several critical factors. This includes determining whether customers are classified as politically exposed persons (PEPs), originating from high-risk jurisdictions, or operating with complex and opaque business structures. Special attention is given to customers whose profiles suggest heightened exposure to money laundering (ML), terrorist financing (TF), or proliferation financing (PF) risks.

2. Product and Service Risk:

Products and services are analysed to identify features that may increase risk, such as those facilitating high transaction volumes or allowing anonymous participation. Products with a higher likelihood of exploitation by criminal actors are subject to enhanced monitoring and control measures.

3. Geographic Risk:

The Company carefully assesses risks associated with the geographic regions of its customers and operations. Particular focus is placed on jurisdictions known for inadequate AML/CTF/CPF frameworks, high levels of corruption, or significant exposure to terrorism financing risks.

4. Distribution Channel Risk:

We implement strong verification processes across all touchpoints, especially those with embedded anonymity features.

Sector-Specific Risks in iGaming:

In the gambling industry, we recognize and addresses several sector-specific risks related to money laundering (ML), terrorist financing (TF), and proliferation financing (PF). The Company has implemented tailored measures to manage these risks effectively, ensuring compliance with Curaçao's updated regulatory framework and maintaining the integrity of its operations.

- Customer Risk

The Company evaluates customer risk by identifying individuals or groups potentially linked to ML/TF activities. Higher-risk categories include:

- Customers with irregular or opaque income sources.
- Politically exposed persons (PEPs) due to their elevated exposure to corruption risks.
- High spenders or individuals engaging in disproportionate gambling relative to their known financial profile.

To mitigate these risks, the Company employs robust customer due diligence (CDD) procedures, applying enhanced due diligence (EDD) to high-risk individuals. This

includes thorough identity verification, continuous monitoring and profile updates, and additional scrutiny of the source of funds. Third-party transactions are restricted unless they can be validated and meet regulatory requirements.

- Product, Service, and Transaction Risk

The gambling sector's vulnerability to criminal exploitation necessitates stringent controls over its products, services, and transactions. High-risk factors include:

- The potential use of gambling platforms to integrate illicit funds into the financial system.
- Anonymous payment methods, such as virtual assets and prepaid cards.

To address these risks, we implement the following measures:

- Verifying customer identities and the source of their funds during onboarding and throughout the relationship.
- Accepting payments exclusively through licensed and regulated financial service providers.
- Actively monitoring customer accounts and peer-to-peer platforms to identify suspicious patterns or transactions.
- Employing advanced fraud detection and prevention tools to safeguard against financial crimes.
- Providing ongoing training for employees to recognize and report suspicious activities promptly.

These strategies ensure that the Company's products and services are not misused for criminal purposes.

- Geographical Risk

Geographical risks arise from the origin of a customer's funds or their location, particularly in jurisdictions with inadequate AML/CTF/CPF controls or high corruption levels. The Company manages these risks by:

- Continuously monitoring and assessing country-specific risk levels using credible sources such as FATF reports, sanctions list, and Transparency International's Corruption Perception Index.
- Updating geographic risk assessments regularly to reflect emerging threats.
- Applying stricter due diligence and enhanced measures for customers from high-risk jurisdictions.

These efforts help the Company minimize exposure to regions with elevated financial crime risks.

- Distribution Channel Risk

The types of channels used to establish business relationships can pose unique risks. Non-face-to-face interactions and anonymous channels increase exposure to fraud and identity theft, while reliance on unregulated third-party intermediaries can undermine AML/CTF/CPF controls. We mitigate these risks through:

- Using advanced digital tools to verify customer identities and detect impersonation attempts.
- Ensuring that no anonymous or unregulated third parties are involved in client interactions.
- Strengthening controls around third-party service providers to confirm their compliance with AML/CTF/CPF regulations.

Integrated Risk Management

By integrating a risk-based approach into its AML/CTF/CPF policies, we effectively manage the sector-specific risks associated with gambling. The Company's proactive measures not only ensure compliance with Curaçao's new regulations but also uphold the integrity of the gambling industry and safeguard its operations against exploitation by criminal elements.

Mitigation Measures

Once risks are identified, the Company implements a series of tailored risk mitigation measures designed to address the specific risk level:

- **Enhanced Due Diligence (EDD):**
EDD is conducted for high-risk customers and transactions. This involves collecting additional information, such as the source of funds, beneficial ownership structures, and the purpose of the transactions. These measures provide deeper insights into customer profiles and transactional activities.
- **Sophisticated Transaction Monitoring:**
The Company employs advanced transaction monitoring systems capable of setting alert thresholds and detecting suspicious patterns that may indicate ML, TF, or PF activities. These systems analyze transaction data in real time, flagging anomalies for further investigation.
- **Robust Identity Verification:**
For high-risk individuals, we enforce rigorous identity verification protocols. These include checks through reliable sources, cross-referencing data against sanctions lists, and ongoing monitoring to ensure customer profiles remain accurate and up to date.

Ongoing Monitoring and Policy Adaptation

The Company recognizes that continuous monitoring and periodic reviews are essential to maintaining an effective risk-based approach. Transaction data is regularly examined to identify suspicious activities, and customer profiles are updated as new information becomes available. AML/CTF/CPF policies and procedures are reviewed and revised periodically to ensure alignment with evolving risks, regulatory developments, and global best practices.

Reporting and Record-Keeping

Accurate reporting and diligent record-keeping are integral to our compliance framework. All suspicious transactions are promptly reported to the relevant authorities, ensuring regulatory obligations are met without delay. The Company maintains comprehensive records of customer identification, transactional data, and risk assessments for the legally mandated retention period. These records are stored securely and made accessible for regulatory inspections when required, demonstrating our commitment to transparency and accountability.

Technological Innovation and Risk Management:

We are committed to ensuring that technological progress is harnessed responsibly and not exploited for illicit purposes such as money laundering (ML) or terrorist financing (TF). As the iGaming sector continues to evolve through digital transformation, the Company employs a proactive, risk-based approach to identify and mitigate vulnerabilities that may arise from adopting new technologies. This includes embedding thorough risk evaluation processes into all innovation-related activities—ranging from service enhancements to operational upgrades—to maintain full compliance with AML, CTF, and CPF obligations.

Procedures for Identifying and Assessing Technological Risk

In line with its commitment to risk prevention, we perform comprehensive risk assessments whenever new technologies or service models are introduced. This process is triggered in the following situations:

- The rollout of new platform features or gaming products
- Implementation of new operational models aimed at streamlining performance or improving player engagement
- Adoption of modern delivery methods, such as digital wallets, advanced payment options, or remote identity verification
- Integration of advanced technologies, including artificial intelligence, blockchain infrastructure, or next-generation cybersecurity systems

Before implementation, each initiative undergoes a structured evaluation to determine whether the proposed innovation introduces any potential risk of misuse for financial crime. The findings are thoroughly documented and measured against

applicable domestic and international AML/CTF standards, ensuring a robust compliance posture.

Mitigation Measures for Technology-Related Risks

Once risk areas have been identified, we respond by implementing a tailored set of safeguards to fortify its systems against misuse. These include:

- **Reinforcement of Security Measures**
Deploying advanced protective solutions such as multi-factor authentication (MFA), biometric identification tools, end-to-end encryption, and AI-driven fraud detection mechanisms to ensure system integrity.
- **Upgrading Transaction Monitoring Systems**
Enhancing monitoring platforms with automated intelligence capable of detecting unusual behavior and transaction patterns consistent with ML or TF activity.
- **Adaptation of Internal Policies**
Updating AML and CTF protocols to incorporate newly emerging risk factors brought on by technological advancements, ensuring policies remain flexible and responsive to the shifting financial crime landscape.

Through continuous assessment and timely adaptation to new technologies, we safeguard both its operations and reputation. This strategy supports the Company's mission to stay ahead of evolving risks without compromising innovation. In doing so, we reaffirm our commitment to maintaining a secure, transparent, and fully compliant digital gaming environment aligned with global AML/CTF best practices.

Compliance with Curaçao's Legislation:

The Company adheres to the updated requirements of the National Ordinance on Games of Chance (LOK), ensuring full compliance with Curaçao's revised AML/CTF/CPF framework. The Company has established and implemented robust Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (AML/CTF/CPF) programs, carefully tailored to align with its size, operational scope, and organizational complexity. These programs are grounded in a risk-based approach (RBA), which allows the Company to allocate resources efficiently and prioritize high-risk areas to mitigate vulnerabilities effectively.

A critical component of this compliance strategy is comprehensive training for all employees. Regular and targeted training sessions are conducted to ensure staff members fully understand their responsibilities under the AML/CTF/CPF framework, with a specific focus on the principles of the RBA and effective risk management practices. This training equips employees to identify and address potential threats, ensuring they remain vigilant and capable of fulfilling regulatory obligations.

To maintain transparency and accountability, we engage independent auditors to evaluate the effectiveness of its AML/CTF/CPF programs. These audits assess the implementation of the RBA, the adequacy of internal controls, and the overall compliance of the Company's policies and procedures with Curaçao's legislation. The insights gained from these audits are used to strengthen existing frameworks and ensure the Company remains aligned with evolving regulatory standards.

Through these measures, we demonstrate our unwavering commitment to upholding Curaçao's new legislative requirements while ensuring the integrity and security of its operations.

4. CUSTOMER DUE DILIGENCE

The Company strictly complies with regulatory requirements prohibiting the creation or use of anonymous or fraudulent accounts. Verifying the identities of all players is a fundamental process in combating money laundering (ML), terrorism financing (TF), and proliferation financing (PF). The Company ensures thorough identity verification procedures are in place, enabling a clear understanding of customer profiles and business relationships. This process not only mitigates financial crime risks but also strengthens the integrity and transparency of its operations.

A robust Customer Due Diligence (CDD) program lies at the core of the Company's risk management strategy. Through this program, we assess customer risks and ensures adherence to legal and behavioural compliance standards. Enhanced due diligence (EDD) measures are applied to high-risk individuals or transactions, ensuring comprehensive risk assessment and monitoring.

If suspicious activities are identified, we promptly reports them to the Financial Intelligence Unit (FIU) of Curaçao in accordance with regulatory requirements. In cases where the severity of the activity necessitates further legal action, reports are escalated to the Public Prosecutor's Office. By taking these measures, we demonstrate its commitment to maintaining a secure and compliant gaming environment, aligned with Curaçao's updated regulatory framework.

4.1. CDD Measures

The Company enforces Customer Due Diligence (CDD) measures in a range of scenarios to ensure compliance with Curaçao's regulatory framework and to mitigate risks related to money laundering (ML) and terrorism financing (TF). CDD measures are implemented under the following circumstances:

1. **Transactions Equal to or Exceeding NAF 4,000:**
For any transaction involving an amount of NAF 4,000 or more, whether conducted as a single event or a series of linked transactions, CDD is mandatory.
2. **Occasional Transactions Above NAF 4,000:**
Occasional transactions that exceed this threshold, even if the customer does not maintain an ongoing relationship with the Company, trigger the need for CDD measures.
3. **Suspicion of Money Laundering or Terrorism Financing:**
If there is any suspicion that a transaction may be connected to money laundering, terrorism financing, or proliferation financing activities, CDD measures are applied regardless of the transaction amount.
4. **Uncertainties in Customer Identification:**
When there are doubts or discrepancies in previously obtained customer identification information, we require a fresh application of CDD to ensure accuracy and compliance.
5. **Linked Transactions Exceeding NAF 4,000:**
Even if individual transactions fall below the NAF 4,000 threshold, the Company assesses whether multiple linked transactions cumulatively exceed this amount. If so, these transactions are subject to CDD measures to prevent structuring or other illicit activities designed to evade detection.
6. **High-Risk Transactions:**
Transactions flagged as high-risk due to customer profile, geographic origin, or other factors undergo Enhanced Due Diligence (EDD). This includes additional scrutiny of the source of funds, beneficial ownership, and the purpose of the transaction.

By applying these measures, we ensure a robust framework for identifying and managing risks associated with financial crimes, safeguarding the integrity of its operations, and maintaining compliance with Curaçao's regulatory standards.

Details of CDD Measures

We implement comprehensive Customer Due Diligence (CDD) measures as a critical component of its compliance framework. These measures ensure the accurate identification and verification of players, promote transparency, and reduce exposure to risks associated with money laundering (ML), terrorism financing (TF), and proliferation financing (PF). The Company's approach to CDD includes the following key components:

Identifying and Verifying Players

- **Identity Verification:**
We verify the identities of all players using legitimate, reliable, and independent documents, data, or systems. Accepted documentation includes government-issued identification, passports, or other credible proof of identity, supplemented by technology-driven verification tools where applicable.
- **Beneficial Ownership for Legal Entities:**
For players acting on behalf of legal entities, the Company identifies and verifies the ultimate beneficial owner (UBO). This includes analysing the ownership and control structure to ensure clarity regarding who ultimately controls the entity.
- **Purpose and Nature of Business Relationship:**
A thorough understanding of the player's purpose for engaging with the casino and the nature of the business relationship is established. This helps the Company assess whether the activities align with legitimate and expected behaviour.
- **Ongoing Due Diligence:**
We conduct continuous monitoring of player activity and transactions. This ensures consistency with the casino's knowledge of the player, their risk profile, and declared sources of funds. If necessary, enhanced scrutiny is applied to verify the origin of funds, particularly in high-risk scenarios.

Timing of CDD

We implement Customer Due Diligence (CDD) in a timely and systematic manner, in full accordance with applicable Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Counter-Proliferation Financing (CPF) regulations. This ensures that customer identity and risk assessments are completed efficiently and thoroughly, reinforcing the Company's commitment to a compliant and secure gaming environment.

Transaction Thresholds Requiring CDD

From the point of registration, Company collects and verifies key customer details, including:

- Full legal name
- Residential address
- Date of birth
- Politically Exposed Person (PEP) status
- Screening against sanctions lists

Under its risk-based policy, the Company conducts full identity verification before authorizing any financial transaction that equals or exceeds NAF 4,000. This threshold applies to:

- A single transaction of NAF 4,000 or more.
- A series of linked transactions (e.g., multiple deposits, withdrawals, or peer-to-peer transfers) that cumulatively reach this amount.

To manage this proactively, we track and aggregates all financial activity per customer, beginning from the start of the business relationship. Once the threshold is met, a full customer risk profile is created or updated, and any pending CDD obligations are completed immediately.

Proactive Verification Practices

We emphasize the early completion of CDD, often initiating full identity verification at the point of account creation—before any transactional activity occurs. This approach reduces the risk of unverified users conducting financial operations and helps detect illicit behaviour at the earliest possible stage.

Restrictions for Incomplete CDD

If a player reaches the NAF 4,000 threshold prior to completing CDD, the following safeguards are activated:

- For deposits: The customer will be restricted from making further deposits or initiating withdrawals. However, they may continue to use existing account balances for gameplay.
- For withdrawals: The account is temporarily frozen, and all gaming activity is halted until CDD verification is completed in full.

These measures ensure compliance while allowing limited account functionality for non-suspicious customers during the verification window.

Handling Non-Compliance with CDD Requirements

If the customer fails to submit the required verification documentation within 30 days of reaching the NAF 4,000 threshold, we will take the following steps:

- Terminate the business relationship.
- If suspicious activity is suspected, file a Suspicious Transaction Report (STR) with the Financial Intelligence Unit (FIU);

- If no suspicion is present, refund the remaining account balance to the original source of funds (e.g., linked bank account or e-wallet);
- In cases of continued suspicion, apply internal procedures to determine whether to freeze the funds in accordance with AML/CTF regulations.

Mitigating Tipping-Off Risks

We understand that certain actions—such as freezing an account or denying service—could inadvertently alert a customer to a compliance investigation. To avoid breaching anti-tipping-off provisions, each case is assessed with care, and staff follow internal protocols to ensure discreet and appropriate handling.

By ensuring that CDD is carried out promptly, strategically, and in line with legal standards, we reinforce its defence against financial crime and upholds the transparency and integrity of its gaming operations across all platforms.

4.2. Identification and Verification

We are committed to implementing a comprehensive and thorough process for identifying and verifying its players, ensuring compliance with Curaçao's regulatory framework and maintaining the integrity of its operations. This detailed approach to player identification not only minimizes the risks associated with money laundering (ML) and terrorism financing (TF) but also promotes a secure and trustworthy gaming environment. The identification and verification processes are designed to gather essential information, assess associated risks, and authenticate player identities through multiple layers of verification.

Identification Process

To establish the identity of each player, the Company collects a wide range of information to ensure that individuals are accurately identified. The required information includes the player's full name, permanent residential address, date and place of birth, nationality, and a valid identity number. These details are fundamental to building a profile that accurately reflects the player's identity and serves as the foundation for further due diligence.

In cases where players are deemed to pose a lower risk, the Company may limit the scope of information collection to these basic details. However, in higher-risk scenarios, where the likelihood of money laundering or terrorism financing is elevated, additional data is collected to mitigate potential risks. By tailoring the information requirements to the level of risk, the Company ensures that its customer due diligence (CDD) measures are both proportionate and effective in addressing potential vulnerabilities.

Risk Assessment

The initial risk assessment begins as soon as the player's information is collected, with a preliminary risk rating assigned based on various factors such as the player's

geographic location, transaction patterns, and financial profile. This risk rating helps the Company determine the appropriate level of scrutiny required for the player, ranging from standard CDD to Enhanced Due Diligence (EDD) in higher-risk situations. As the relationship with the player progresses and more data becomes available, the risk rating is continuously refined, ensuring that the Company's monitoring processes remain dynamic and responsive to any changes in the player's behaviour or circumstances.

This ongoing assessment allows us to implement risk-based measures that align with the player's profile, ensuring that higher-risk customers are subject to stricter controls while lower-risk customers are managed with proportionate oversight.

Verification Process

The verification process is an essential component of the Company's risk management strategy, ensuring that players are who they claim to be and that their activities are legitimate. This multi-layered process involves a combination of primary identification methods, supplementary documentation, and advanced verification tools to authenticate the player's identity with precision.

1. Primary Documents:

To verify a player's identity, we require the submission of a government-issued photo ID, such as a valid passport, national ID card, or driver's license. These documents serve as the primary evidence of the player's identity and are carefully reviewed for authenticity and validity.

2. Supplementary Documents:

In addition to primary identification, players are required to provide supporting documents to confirm their residential address. Acceptable documents include utility bills, bank statements, or similar records issued within the past six months. These supplementary documents help the Company establish a verified connection between the player and their declared address.

3. Address Verification:

To further ensure accuracy, the Company may use additional methods to confirm the player's residential address. This may involve sending correspondence to the address, verifying it through email or phone communication, or using third-party verification systems to validate the information provided.

4. Advanced Verification Tools:

The Company leverages modern technological tools and techniques to enhance the verification process. This includes biometric checks such as facial recognition technology, cross-referencing player information against trusted databases, analysing IP addresses to detect geographic inconsistencies, and assessing funding methods to ensure they align with

the player's declared financial sources. These advanced tools provide an additional layer of security, helping to identify and address potential discrepancies in the player's profile.

Additional Measures for Insufficient Information

When the information provided by a player is insufficient or raises concerns about its accuracy or legitimacy, we take additional steps to verify the player's identity. For instance, the Company may request a selfie of the player holding their government-issued ID to confirm the document's authenticity and ensure the player's identity matches the provided information. In some cases, the Company may also require the player to verify their first deposit through a regulated financial institution, further validating the legitimacy of their funding source and financial activities.

These measures are particularly important in high-risk situations, where the potential for money laundering or terrorism financing is greater. By taking these extra precautions, we ensure that even the most complex cases are handled with the utmost diligence and scrutiny.

Commitment to Compliance

Through its comprehensive player identification and verification processes, we uphold its commitment to regulatory compliance and the prevention of financial crimes. By collecting and verifying detailed player information, continuously assessing risk levels, and employing advanced verification tools, the Company ensures that its operations remain secure and compliant with Curaçao's AML/CTF/CPF framework. These measures not only protect the Company from potential risks but also contribute to the integrity and trustworthiness of the broader gaming industry.

4.3. Establishing and Understanding Relationships

As part of its Customer Due Diligence (CDD) process, we ensure a thorough understanding of the purpose and nature of its relationships with players. While the nature of the relationship in the gaming sector is typically straightforward, the Company collects sufficient information to identify and assess any unusual or suspicious activities that may arise during the course of the relationship.

For players categorized as higher risk, the Company takes additional precautions by gathering comprehensive documentation about their source of wealth, expected levels of activity, and any other relevant financial details. This in-depth approach ensures that the legitimacy of their funds and gaming activities is verified and that the Company maintains compliance with AML/CTF/CPF regulatory standards.

In contrast, for players with a lower or medium-risk profile, the Company employs a more streamlined approach. A basic declaration providing details of employment, occupation, or business activities is typically sufficient to establish the legitimacy of

their relationship with the Company. However, for higher-risk players, relies on independent and credible sources to validate the information provided, ensuring a greater degree of scrutiny and accuracy in such cases.

This tiered approach allows us to tailor its due diligence measures to the specific risk level of each player, balancing efficiency with the need for robust compliance measures to detect and prevent potential financial crimes.

4.4. Ongoing Monitoring of Existing Clients

We place significant emphasis on the continuous monitoring of player identities and transactions as a critical component of its Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (AML/CTF/CPF) policy. Ongoing monitoring ensures that the Company remains vigilant against evolving risks and aligns its operations with regulatory requirements.

The Company's monitoring process includes:

1. Regular Updates and Verification:

Player details are periodically reviewed and updated, with particular focus on high-risk individuals. This ensures that all information remains current and accurate, allowing for more effective risk assessments and compliance oversight.

2. Transaction Scrutiny:

Transactions are closely examined for unusual or suspicious patterns that may indicate potential money laundering, terrorism financing, or other illicit activities. This includes analyzing the frequency, volume, and geographic origin of transactions to detect anomalies.

3. Enhanced Due Diligence (EDD):

For transactions involving amounts of NAF 4,000 or more, including single transactions or multiple linked transactions that cumulatively exceed this threshold, the Company applies Enhanced Due Diligence measures. This involves additional scrutiny of the source of funds, purpose of the transaction, and the legitimacy of the player's activities.

4. Real-Time Monitoring Systems:

Our employs advanced transaction monitoring systems to identify potential red flags in real-time. These systems are designed to detect suspicious patterns and anomalies, enabling the Company to act promptly by investigating the activity and, if necessary, reporting the findings to the Financial Intelligence Unit (FIU) of Curaçao.

By integrating these monitoring measures into its operational framework, we ensure that it proactively identifies and mitigates risks, maintains compliance with Curaçao's AML/CTF/CPF regulations, and upholds the integrity of its gaming platform.

CDD on Existing Clients

Customer Due Diligence (CDD) is not limited to the initial onboarding process. It is an ongoing responsibility that extends throughout the entire duration of a customer's relationship with the Company. By embedding continuous monitoring and periodic risk reassessments into its compliance strategy, we ensure alignment with international standards for Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Counter-Proliferation Financing (CPF). This continuous approach is central to the Company's broader risk-based framework, allowing it to adapt swiftly to emerging threats and regulatory developments.

Ongoing Review and Monitoring:

Routine Due Diligence for Active Clients

We consistently enforce CDD protocols for all active customers. This includes persistent monitoring of transaction behaviour and reassessing client risk levels to detect changes that may necessitate further review.

Targeted Follow-Up for Incomplete CDD:

Where a customer's initial due diligence was insufficient or outdated, the Company employs a retrospective approach. This involves:

- Updating CDD files for customers now classified as higher risk.
- Scheduling systematic updates to keep client data current and in line with AML/CTF/CPF compliance obligations.

When CDD Must Be Reapplied:

- A significant change in customer activity, such as unusually large transactions, changes in country of residence, or designation as a Politically Exposed Person (PEP)
- Regulatory updates requiring revised or additional customer information.
- A customer initiating transaction totalling NAF 4,000 or more, thereby meeting the threshold for full identity verification in accordance with the Company's compliance policy.

Closing Historical CDD Gaps:

For clients who were previously onboarded without complete due diligence—whether due to legacy systems or evolving standards— we apply the following remediation measures:

- High-risk customers are flagged for immediate CDD completion.

- Full CDD is implemented at defined intervals based on the customer's assessed risk level.

Confidentiality of Reporting

The Company takes confidentiality seriously when handling reports of suspicious activities:

- **No Tipping Off Players:**
Staff members are strictly prohibited from informing players when a report has been submitted to the Financial Intelligence Unit (FIU). Maintaining discretion is essential to avoid tipping off individuals who may be involved in money laundering or terrorism financing activities.
- **Bypassing CDD in Suspicious Cases:**
In instances where completing the CDD process could alert the player to suspicions of illicit activity, we bypass the standard process. Instead, the Company files a Suspicious Activity Report (SAR) directly with the FIU to ensure prompt and confidential reporting while avoiding any compromise to ongoing investigations.

By enforcing these detailed CDD measures, we ensure compliance with Curaçao's AML/CTF/CPF regulatory framework. The Company's efforts contribute to the prevention of financial crimes, safeguard the integrity of its operations, and uphold its commitment to regulatory compliance and ethical business practices.

4.5. Enhanced Due Diligence, Simplified Due Diligence and PEP's

Enhanced Due Diligence (EDD)

In high-risk scenarios, the Company implements Enhanced Due Diligence (EDD) measures to ensure comprehensive scrutiny and mitigate potential risks associated with money laundering (ML), terrorism financing (TF), or proliferation financing (PF). These measures are designed to address the elevated risks posed by certain players, transactions, or circumstances. Key EDD procedures include:

1. **Comprehensive Background Investigations:**
A detailed examination of the player's background is conducted to assess their financial and personal profile. This includes verifying their professional history, financial activity, and any connections to higher-risk entities or jurisdictions.
2. **Verification of Source of Funds and Wealth:**
We require players to provide evidence of the source of their funds and overall wealth. This step ensures that the money used in transactions originates from legitimate and verifiable sources.
3. **Close Analysis of Transaction Patterns:**
Transaction activity is closely monitored to identify irregularities or

suspicious patterns that may indicate potential financial crime. This includes evaluating the frequency, volume, and geographic origins of transactions.

4. Frequent Updates of Identification Information:

Identification details for high-risk players are updated regularly to ensure that all records remain accurate and up to date. This helps maintain the integrity of the Company's compliance framework.

EDD measures are particularly stringent for Politically Exposed Persons (PEPs), as their elevated exposure to corruption risks necessitates thorough risk assessments and continuous monitoring. Ongoing scrutiny is applied to ensure that the player's activities remain consistent with the Company's understanding of their risk profile.

Simplified Due Diligence (SDD)

For low-risk scenarios, we apply Simplified Due Diligence (SDD) measures, which allow for a more streamlined approach to customer onboarding and monitoring. These measures are reserved for players or transactions that present minimal risk based on the Company's risk assessment criteria. Key aspects of SDD include:

1. Basic Customer Information Collection:

Essential customer details, such as name, address, and basic identification, are collected without requiring extensive documentation or additional verification steps.

2. Less Frequent Reviews:

Player profiles and activities are reviewed at longer intervals compared to higher-risk scenarios, reflecting the reduced level of associated risk.

While SDD enables a more efficient process, we ensure that enhanced measures are promptly implemented if any suspicious activities are identified or if a player's risk profile changes. This flexibility ensures that the Company maintains a balance between operational efficiency and regulatory compliance, safeguarding against potential threats at all risk levels.

Handling Politically Exposed Persons (PEPs)

As part of its commitment to mitigating risks related to money laundering (ML), terrorism financing (TF), and proliferation financing (PF), we implement strict measures for handling Politically Exposed Persons (PEPs), their family members, and close associates. Recognizing that PEPs are inherently at higher risk of being involved in corruption or other financial crimes due to their positions of power, the Company's AML/CTF/CPF policy mandates heightened scrutiny through Enhanced Due Diligence (EDD).

The procedures for managing PEP-related risks include:

1. Obtaining Senior Management Approval:

Any decision to onboard or maintain a business relationship with a PEP

requires prior approval from senior management. This ensures that the associated risks are thoroughly reviewed and endorsed at the highest level within the Company.

2. Verification of Source of Funds and Wealth:

A comprehensive understanding of the PEP's financial background is required, including verifying the source of their funds and wealth. This step ensures that the player's financial activity is consistent with their declared profile and eliminates the risk of handling illicit or misappropriated assets.

3. Rigorous Ongoing Monitoring:

We conduct continuous and detailed monitoring of PEP accounts and transactions to identify any unusual or suspicious patterns promptly. This includes assessing the volume, frequency, and nature of transactions against expected behaviours and maintaining updated profiles for the PEP and their associated entities.

4. Family Members and Close Associates:

The Company extends its EDD measures to the family members and close associates of PEPs, as they may also present indirect risks by facilitating transactions or serving as intermediaries for illicit activities. These individuals are subject to the same level of scrutiny as the PEP themselves.

By implementing these measures, we ensure that its operations remain compliant with Curaçao's regulatory requirements and international best practices. The Company's proactive approach to handling PEPs reinforces its commitment to transparency, accountability, and the prevention of financial crimes.

4.6. Relationship Termination

The Company reserves the right to terminate its relationship with any player who engages in suspicious activities, fails to provide the required information, or otherwise poses an unacceptable level of risk. The decision to terminate a relationship is treated with the utmost seriousness, ensuring that appropriate steps are taken to comply with regulatory obligations and protect the integrity of the Company's operations.

The termination process includes the following key steps:

1. Documentation and Approval:

Any decision to terminate a player relationship must be thoroughly documented, detailing the reasons for the termination and the associated risk factors. The decision is subject to review and approval by senior

management, ensuring that it aligns with the Company's AML/CTF/CPF policy and overall risk management strategy.

2. Comprehensive Review of Activities:

Upon termination, the player's activities are subjected to a detailed review. This includes an in-depth examination of all transactions conducted during the relationship to identify any patterns or activities that may warrant further investigation or reporting.

3. Reporting Suspicious Transactions:

If suspicious activities or transactions are identified during the termination process, they are promptly reported to the Financial Intelligence Unit (FIU) of Curaçao. This ensures compliance with regulatory requirements and supports broader efforts to combat financial crime.

4. Record Retention:

All records related to the terminated relationship, including identification documents, transaction histories, and termination-related documentation, are securely stored for a minimum of five years. This retention period ensures that the Company can respond to any regulatory inquiries or audits that may arise in the future.

By enforcing a robust termination policy, we demonstrate its commitment to maintaining a secure and compliant gaming environment. This policy ensures that the Company can effectively address potential risks while adhering to Curaçao's regulatory framework and international best practices.

5. SUSPICIOUS ACTIVITY REPORTING

We are deeply committed to identifying and reporting any unusual activity that may suggest potential money laundering (ML) or terrorism financing (TF). The Company ensures that its employees remain vigilant in recognizing deviations from normal behaviour or transaction patterns that could signal suspicious activity. This includes frequent high-value transactions, dealings involving high-risk regions, or financial behaviours inconsistent with a client's usual profile.

When an employee identifies unusual activity, they are required to immediately escalate their observations to the designated Compliance Officer. The Compliance Officer then conducts a thorough investigation to evaluate the flagged activity against regulatory requirements and known risk indicators. Based on this analysis,

the Compliance Officer determines whether the activity necessitates further action or a formal report to the relevant authorities, such as the Financial Intelligence Unit (FIU) of Curaçao.

Unusual Transactions

A transaction is considered unusual when it significantly deviates from a customer's established financial behaviour or expected transaction profile. These deviations may involve:

- Uncharacteristically large transfers
- Engagements with previously unverified or unknown third parties
- Transactions that lack a clear or lawful economic rationale

We utilize automated monitoring systems to flag such anomalies, which are then escalated to the Compliance Officer for in-depth analysis. The following categories of transactions are deemed unusual under the Company's AML framework and may trigger further investigation or external reporting:

Transactions Already Reported to Authorities

Any transaction that has been formally reported to law enforcement—such as the Police or the Department of Justice—on the basis of suspected ML or TF involvement is automatically treated as unusual and requires no further threshold to qualify for escalation.

Transactions Involving Sanctioned Entities

Any financial activity involving individuals, organizations, or groups listed under the *Sanctions National Ordinance (N.G. 2014 no. 55)* is considered unusual. This includes dealings with any entity sanctioned by national authorities or included in official sanctions databases.

Transactions at or Above NAF 5,000

Transactions equal to or exceeding NAF 5,000, regardless of the method of payment—cash, check, digital transfer, or otherwise—are subject to heightened scrutiny. Specific examples include:

- Deposits or withdrawals of NAF 5,000 or more
- Purchases of gaming chips, tokens, or digital gaming credits totaling NAF 5,000 or above
- Payouts or redemptions meeting or exceeding this threshold

In addition to standalone transactions, a series or combination of transactions that together reach or surpass NAF 5,000 within a single gaming day are also subject to review and are collectively assessed as potentially unusual.

Transactions Suggesting ML or TF Behaviour

Where there is reasonable cause—based on context, red flags, or internal risk indicators—to believe that a transaction may be associated with money laundering or terrorist financing, we treat the transaction as unusual and escalates it for further review.

Confidentiality in Reporting

To preserve the integrity of the reporting process and comply with legal requirements, we enforce strict confidentiality regarding suspicious activity reports (SARs). Employees are expressly prohibited from disclosing any information related to SARs to the subjects of the reports or to unauthorized individuals. This restriction is critical to preventing interference with ongoing investigations, tipping off the subjects involved, or compromising legal processes.

All communications related to suspicious activity are handled with the highest level of discretion and are shared only with the Compliance Officer or other authorized personnel. Employees are trained to recognize the importance of confidentiality in maintaining the effectiveness of the Company's anti-money laundering framework.

Violations of this confidentiality policy are treated as serious infractions of our AML/CTF/CPF policy and may result in disciplinary actions, including termination of employment. This approach ensures that the reporting process remains secure, compliant, and effective in addressing and mitigating potential threats posed by financial crimes.

By fostering a culture of vigilance and discretion, we reinforce its commitment to protecting the integrity of its operations while adhering to Curaçao's regulatory framework and international best practices.

6. SANCTIONS COMPLIANCE AND MONITORING

We are committed to adhering to international sanctions and regulatory standards as part of its comprehensive Anti-Money Laundering, Counter-Terrorism Financing, and Counter-Proliferation Financing (AML/CTF/CPF) policy. The Company implements rigorous procedures to ensure compliance with all sanctions imposed by national and international authorities, safeguarding its operations and mitigating financial crime risks.

Thorough Due Diligence on Clients and Transactions

To meet these obligations, we conduct exhaustive due diligence on all clients and transactions. This process aims to prevent any direct or indirect interaction with individuals, entities, or regions listed under sanctions. The Company diligently screens clients and their transactions to identify potential risks, ensuring that no activities breach applicable sanctions regulations.

Ongoing Monitoring and Reporting

Monitoring and reporting play a central role in the Company's sanctions compliance framework. Our employs advanced systems to continuously monitor all client transactions, ensuring they remain free from suspicious activities that could contravene sanctions laws.

- **Real-Time Monitoring:** Automated systems are used to verify transactions and interactions against the most recent Sanctions Lists in real-time.
- **Prompt Reporting:** Any anomalies or suspicious activities detected during monitoring are escalated immediately to the relevant authorities, such as the Financial Intelligence Unit (FIU), ensuring prompt resolution.
- **Decisive Action:** In cases where a match or suspicious activity is identified, the Company takes swift and decisive measures, including freezing accounts, blocking transactions, and conducting account reviews.

Commitment to Staff Training and Awareness

The Company reinforces its compliance culture through ongoing staff training programs designed to keep all personnel informed about current sanctions regulations and their implications. These training sessions cover the latest updates to sanctions lists and best practices for detecting and reporting potential breaches. By maintaining a well-informed workforce, we ensure that compliance efforts are consistently robust and effective.

Regular Reviews and Updates

We recognize the dynamic nature of sanctions legislation and ensures that its compliance framework is regularly reviewed and updated to align with evolving regulations. This includes maintaining up-to-date access to key sanctions lists, such as:

- Sanctions National Ordinance (SNO, N.G. 2014, no. 55) and Kingdom Sanction Act (N.G. 2016, no. 54).
- Curaçao Gaming Control Board (GCB) announcements.
- European Union (EU) Sanctions.
- United Nations Security Council Consolidated List.
- UK Office of Financial Sanctions Implementation (OFSI) Sanctions.

- US List of Foreign Terrorist Organizations and Office of Foreign Assets Control (OFAC) Sanctions.

The Company's due diligence procedures are designed to uncover indirect or covert attempts to engage with sanctioned parties or jurisdictions. If any evasion tactics are discovered, they are promptly reported to the relevant authorities, and immediate corrective measures—such as transaction suspensions, account freezes, or intensified reviews—are implemented.

Audits and Preventive Measures

Regular internal audits and external reviews ensure the ongoing effectiveness of our sanction's compliance framework. These audits provide valuable insights into potential vulnerabilities, enabling the Company to refine its systems and procedures continuously.

By integrating advanced monitoring systems, meticulous due diligence, and proactive reporting mechanisms into its operations, we demonstrate its unwavering commitment to compliance. This approach not only protects the Company from potential regulatory breaches but also contributes to global efforts to prevent financial crime, sanctions evasion, and illicit activities.

7. SENIOR MANAGEMENT

Senior management play a critical role in evaluating and managing risks related to Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Counter-Proliferation Financing (CPF). By providing strategic oversight and leadership, senior management ensures that the Company's policies, procedures, and control environment remain robust, effective, and aligned with both regulatory requirements and global best practices.

To facilitate effective oversight, the Board of Directors mandates that the appointed AML/CTF/CPF Officer provides regular updates on significant developments or issues within the Company's control environment. In addition, the officer is required to submit an annual report assessing the effectiveness of the Company's AML/CTF/CPF measures and controls. This report serves as a key tool for evaluating the Company's ability to mitigate risks associated with money laundering, terrorism financing, and proliferation financing.

Annual Reviews and Risk Assessments

Senior management conducts comprehensive reviews of all relevant AML/CTF/CPF policies and procedures at least once a year. These reviews are guided by insights from monthly risk assessments, which help identify potential weaknesses or gaps in the Company's internal controls and risk management framework.

In cases where deficiencies are identified, the AML/CTF/CPF Officer is empowered to recommend adjustments to the Board of Directors. These proposed changes are carefully reviewed and, upon approval, implemented to enhance the Company's ability to manage risks and maintain regulatory compliance. By addressing these weaknesses proactively, we ensure that its internal controls remain resilient against evolving threats.

Employee Training and Awareness

A critical component of senior management's role involves overseeing the development and execution of comprehensive employee training programs. These programs are designed to increase awareness and understanding of AML/CTF/CPF risks, ensuring that all employees, especially those in key roles, are well-equipped to detect and respond to suspicious activities.

Training sessions are regularly updated to incorporate the latest regulatory requirements, industry best practices, and emerging trends in financial crime. This ensures that the Company's workforce remains informed and capable of upholding the highest standards of compliance.

Internal Control Framework

Senior management ensures that the Company's internal control framework is robust and well-structured to support effective risk management. Key elements of this framework include:

- **Segregation of Duties:** Assigning distinct responsibilities to different personnel to minimize the risk of fraud or errors.
- **Authorization Processes:** Establishing clear and well-documented approval procedures for critical decisions and transactions.
- **Ongoing Monitoring:** Implementing systems and processes to continuously monitor activities, identify anomalies, and detect potential risks in real-time.
- **Thorough Documentation:** Maintaining detailed records of all transactions, decisions, and risk management activities to facilitate audits and regulatory reviews.

Independent Audits and Assessments

To ensure the ongoing effectiveness of the AML/CTF/CPF program, senior management commissions regular independent audits and assessments. These evaluations provide an objective review of the Company's compliance framework, highlighting strengths while identifying areas that require improvement. The findings from these audits are used to refine the Company's policies and procedures, further reinforcing its commitment to regulatory compliance and effective risk management.

By maintaining active oversight, fostering a culture of compliance, and implementing robust internal controls, senior management ensures that the Company remains well-prepared to address risks related to money laundering, terrorism financing, and proliferation financing. This proactive approach not only strengthens the Company's defences against financial crimes but also underscores its dedication to operating with integrity and transparency.

8. COMPLIANCE FUNCTION

Appointment and Role of the Compliance Officer

The Company appointed a qualified individual as the Compliance Officer is a cornerstone of the Company's Anti-Money Laundering (AML) strategy. This appointment, made by senior management, ensures the role's independence and authority, providing the necessary autonomy to oversee the effective implementation of AML policies and procedures. The Compliance Officer is a senior-level professional with substantial expertise in AML compliance and related regulatory frameworks. The position is formalized through an official appointment letter, which outlines their responsibilities, authority, and reporting structure within the organization.

Primary Functions of the Compliance Officer

The Compliance Officer performs several critical functions to ensure the effectiveness and robustness of the Company's AML program. These responsibilities include:

1. **Policy Implementation:**
Overseeing the execution of AML policies and procedures and ensuring that they remain fully aligned with Curaçao's regulations and international best practices.
2. **Central Point of Contact:**
Acting as the primary contact for all AML-related concerns, including internal queries from employees and external communications with regulatory authorities.
3. **Policy Review and Updates:**
Conducting regular reviews and updates of AML policies to reflect changes in regulations, emerging risks, and evolving financial crime trends.
4. **Training Oversight:**
Managing the Company's AML training program to ensure that all employees, especially those in high-risk roles, are equipped with the

knowledge and skills to identify and respond to suspicious activities effectively.

Core Responsibilities of the Compliance Officer

The Compliance Officer is entrusted with several pivotal responsibilities that are essential for the ongoing success of the AML program:

1. Transaction Monitoring and Reporting:
 - o Continuously monitoring client transactions and activities to identify unusual patterns or suspicious behavior.
 - o Filing Suspicious Activity Reports (SARs) with the Financial Intelligence Unit (FIU) of Curaçao as required.
 - o Maintaining detailed and accurate records of all SARs and related documentation, ensuring these are available for regulatory review.
2. Policy Development and Updates:
 - o Crafting, updating, and refining AML policies and procedures to comply with Curaçao's gaming regulations and international standards.
 - o Adjusting the AML framework proactively to address new risks and regulatory developments.
3. Employee Training and Awareness:
 - o Designing and delivering comprehensive AML training sessions to ensure employees understand their roles and responsibilities in detecting and reporting suspicious activities.
 - o Updating training materials regularly to incorporate legislative changes, emerging trends, and feedback from regulatory audits or inspections.
4. Regulatory Liaison:
 - o Acting as the primary liaison with regulatory bodies, law enforcement agencies, and other relevant authorities on AML matters.
 - o Responding promptly to information requests, inquiries, and participating in regulatory inspections or audits to demonstrate the Company's compliance efforts.
5. Compliance Audits and Corrective Actions:

- o Conducting regular internal audits to evaluate the effectiveness of the AML program and ensure adherence to all legal and regulatory requirements.
- o Addressing any identified deficiencies or gaps through corrective measures, ensuring continuous improvement of the Company's compliance framework.

6. Record-Keeping:

- o Maintaining comprehensive records of all AML-related activities, including SAR filings, internal reports, training sessions, and policy updates.
- o Ensuring these records meet legal retention requirements and are readily accessible for review by regulatory authorities.

Importance of the Compliance Officer's Role

By fulfilling these functions and responsibilities, the Compliance Officer plays a pivotal role in protecting from risks associated with money laundering, terrorism financing, and proliferation financing. This position is integral to maintaining the Company's compliance with Curaçao's AML regulations and safeguarding its reputation in the gaming sector.

Through diligent policy implementation, effective risk management, and continuous engagement with employees and regulators, the Compliance Officer ensures that the Company upholds the highest standards of integrity and regulatory compliance.

9. INDEPENDENT AUDIT AND OVERSIGHT OF AML/CTF/CPF COMPLIANCE

Independent Audit and Oversight for AML/CTF/CPF Compliance

In alignment with the updated gaming regulations in Curaçao, we undergo an independent audit focused on its Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Counter-Proliferation Financing (CPF) practices. This audit process is a critical aspect of ensuring compliance with Curaçao's legal framework and maintaining the integrity of the Company's operations.

This section outlines the comprehensive audit process, detailing the role of the independent auditor and the review conducted by the Curaçao Gaming Control Board (GCB).

Purpose and Scope of the AML/CTF/CPF Audit

The primary objective of the annual AML/CTF/CPF audit is to evaluate the effectiveness and compliance of the Company's policies, procedures, and controls. This audit helps to adhere to current legal standards, mitigate risks associated with money laundering and terrorism financing, and align with global best practices.

The audit encompasses a detailed evaluation of the Company's AML/CTF/CPF program, including the following key areas:

- Risk Assessments: Analysing the accuracy and effectiveness of the Company's risk assessments and corresponding mitigation strategies.
- Transaction Monitoring Systems: Assessing the efficiency of systems used to detect and report suspicious activities.
- Staff Training Programs: Evaluating the adequacy and impact of training initiatives to ensure employees understand and fulfill their AML/CTF/CPF responsibilities.
- Reporting Mechanisms: Reviewing procedures for filing Suspicious Activity Reports (SARs) and compliance-related issues.
- KYC, KYB, and CDD Protocols: Verifying adherence to Know Your Customer (KYC), Know Your Business (KYB), and Customer Due Diligence (CDD) requirements.

Selection of the Independent Auditor

The Company engages an independent auditor with substantial expertise in AML/CTF/CPF compliance. The chosen auditor may be an external professional or an internal audit team independent of the Company's AML Compliance department to avoid conflicts of interest.

When selecting an auditor, the Company considers the individual or firm's credentials, experience, and reputation within the industry. Additionally, the Curaçao Gaming Control Board (GCB) must approve the selected auditor to ensure compliance with regulatory standards. This dual-layered approval process reinforces the credibility and objectivity of the audit.

Audit Process and Standards

The audit process adheres to international standards and specific requirements outlined by the GCB. The key elements of the audit include:

1. Evaluation of AML/CTF/CPF Policies and Procedures:
Ensuring that the Company's policies are up-to-date, compliant with legal requirements, and effectively implemented.
2. Risk Management Assessment:
Reviewing the Company's risk management framework to determine the effectiveness of its assessments and mitigation strategies.

3. Transaction Monitoring Review:
Assessing the functionality and reliability of systems used to monitor transactions and identify suspicious patterns.
4. Staff Training Evaluation:
Analysing the scope, frequency, and quality of employee training programs to ensure employees are equipped to recognize and address financial crime risks.
5. Reporting Mechanism Audit:
Examining the effectiveness of the Company's procedures for reporting suspicious transactions and other compliance-related issues to the Financial Intelligence Unit (FIU).
6. Customer File Review:
Verifying compliance with KYC, KYB, and CDD requirements by reviewing customer profiles, documentation, and transaction records.

Audit Reporting and Corrective Actions

Following the audit, the independent auditor produces a comprehensive report detailing findings, recommendations, and any identified issues. This report is presented to the Company's senior management and submitted to the Gaming Control Board for review.

We are committed to addressing the auditor's recommendations promptly. Corrective actions are implemented within a specified timeframe, and follow-up audits may be conducted to confirm that these measures have been applied effectively.

Oversight by the Gaming Control Board

The Board reviews audit results, conducts its own evaluations, and ensures that operators address identified deficiencies.

The Board's examination process includes:

1. Audit Report Review: Analysing the independent auditor's report to assess compliance and identify concerns.
2. Onsite Inspections: Conducting visits to the Company's premises to validate audit findings and evaluate the implementation of corrective actions.
3. Interviews and Documentation Analysis: Engaging with relevant staff members and reviewing documentation to gain a comprehensive understanding of the Company's AML/CTF/CPF practices.

If non-compliance is identified during the audit or the Board's examinations, the Company acknowledges that penalties may be imposed. These penalties could include fines, operational restrictions, or even suspension or revocation of the

Company's gaming license. We are committed to working closely with the Gaming Control Board to resolve any issues, implement corrective measures, and maintain full compliance to prevent future violations.

Through rigorous independent audits, effective corrective actions, and close collaboration with the Gaming Control Board, we ensure that its AML/CTF/CPF practices remain robust, compliant, and aligned with Curaçao's evolving regulatory landscape.

10. AML/CTF/CPF EMPLOYEE TRAINING

The Company has established a comprehensive training program dedicated to Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Counter-Proliferation Financing (CPF). This program is an integral part of the Company's compliance framework, designed to equip employees with the knowledge and skills necessary to effectively identify, prevent, and respond to activities related to money laundering, terrorism financing, and proliferation financing.

The primary objective of the AML/CTF/CPF training is to ensure that all employees are well-informed about their legal responsibilities, proficient in recognizing suspicious behaviours, and familiar with the internal procedures for reporting such activities. By fostering a knowledgeable workforce, we reinforce the integrity and credibility of its operations while contributing to the broader compliance standards of the gaming industry.

Mandatory Training for All Employees

The training program is mandatory for all employees, including:

- **Senior Management:** To provide leadership and oversight on compliance efforts.
- **Compliance Officers:** To maintain and enhance their expertise in AML/CTF/CPF regulations and practices.
- **Customer-Facing Personnel:** To help them identify and report suspicious activities during customer interactions.
- **Operational Staff and Financial Teams:** To ensure proper handling of transactions and adherence to reporting protocols.

Training is tailored to meet the specific needs and risk exposure levels of each role. Employees in high-risk roles or departments, such as those handling financial transactions or managing customer accounts, receive more frequent and specialized training.

Comprehensive Training Approach

1. Initial Training for New Hires:

All new employees undergo in-depth initial training during their onboarding process. This ensures they are familiar with Curaçao's AML/CTF/CPF laws, the Company's internal policies, and their responsibilities in maintaining compliance from the outset.

2. Ongoing and Refresher Training:

Regular refresher courses are conducted for all employees at least once a year to reinforce key concepts, update knowledge of regulatory changes, and address emerging risks. High-risk roles may require additional sessions more frequently to ensure ongoing vigilance.

Core Training Topics

The program covers a range of critical areas essential to AML/CTF/CPF compliance, including:

- **Understanding Curaçao's AML/CTF/CPF Regulations:** Detailed explanations of local laws and international standards.
- **Internal Policies and Procedures:** Familiarization with the Company's AML framework and how to apply it effectively.
- **Roles and Responsibilities:** Clear guidelines on employee duties in preventing and reporting suspicious activities.
- **Customer Identification and Verification:** Training on Know Your Customer (KYC), Know Your Business (KYB), and Customer Due Diligence (CDD) protocols.
- **Suspicious Activity Reporting:** Processes for identifying and escalating potential risks to the Compliance Officer or relevant authorities.
- **Record-Keeping Requirements:** Understanding legal obligations to maintain and securely store records for regulatory review.
- **Consequences of Non-Compliance:** Legal, financial, and reputational risks associated with failures in AML/CTF/CPF compliance.
- **Emerging Threats and Trends:** Awareness of evolving money laundering tactics, terrorism financing methods, and regulatory updates.

Delivery Methods

To ensure accessibility and effectiveness, the training program utilizes a variety of delivery methods tailored to accommodate different learning styles. These include:

- **In-Person Workshops:** Interactive sessions led by experts to facilitate discussion and engagement.

- Online Courses and E-Learning Modules: Flexible, self-paced learning for employees in various locations.
- Practical Exercises: Case studies, role-playing scenarios, and real-world examples to reinforce key concepts and improve application.

This blended approach ensures that employees not only understand the theoretical aspects of compliance but also gain practical skills to handle real-world challenges effectively.

Expert-Led Training

All training sessions are delivered by qualified professionals with significant expertise in AML/CTF/CPF compliance. Depending on the topic, trainers may include internal compliance officers or external consultants with specialized knowledge of Curaçao's gaming regulations and global best practices. The involvement of subject-matter experts ensures that training content is up-to-date, relevant, and aligned with the latest developments in financial crime prevention.

By implementing a robust and dynamic training program, we ensure that its employees are equipped to uphold the highest standards of compliance. This not only protects the Company from regulatory risks but also reinforces its commitment to integrity and responsible operations in the gaming industry.

11. RECORD KEEPING

We adhere to rigorous record-keeping standards as part of its compliance framework for Anti-Money Laundering (AML), Counter-Terrorism Financing (CTF), and Counter-Proliferation Financing (CPF). Maintaining accurate, accessible, and secure documentation is critical for fulfilling regulatory requirements, supporting audits, and ensuring operational transparency within the gaming industry.

Retention of Records

The Company retains a comprehensive range of records for a minimum period of five years, in line with Curaçao's regulatory standards and international best practices. These records include:

- Customer Identification Data: Documentation collected during the KYC (Know Your Customer), KYB (Know Your Business), and CDD (Customer Due Diligence) processes.
- Transaction Records: Details of financial transactions, including amounts, dates, methods of payment, and related customer information.
- Suspicious Activity Reports (SARs): Filed reports detailing suspicious transactions or activities, including supporting evidence and related communications.

- **Training Records:** Documentation of employee participation in AML/CTF/CPF training programs, including dates, attendance, and topics covered.
- **Audit Logs:** Records of internal and external audits conducted to assess the effectiveness of AML/CTF/CPF measures.

This comprehensive retention ensures that the Company can provide the necessary documentation for regulatory reviews, investigations, or audits at any time.

Data Security and Protection

Our employs advanced security measures to safeguard all retained records against unauthorized access, loss, or tampering. These measures include:

- **Encryption:** Sensitive data is encrypted both in storage and during transmission to prevent breaches.
- **Access Controls:** Strict access permissions are implemented, ensuring that only authorized personnel can view or modify records.
- **Regular Security Audits:** The Company conducts routine security audits to verify the integrity of its record-keeping systems and address any vulnerabilities.

These protocols ensure that data remains intact, confidential, and accessible only to those with legitimate authorization.

Efficient Record Organization and Retrieval

The Company utilizes a systematic and well-structured method for organizing records to facilitate efficient retrieval. This includes:

- **Categorized Storage:** Records are categorized by type, such as customer identification, transaction history, and training documentation, for streamlined access.
- **Digital Systems:** Advanced digital storage solutions are employed to enable quick and accurate retrieval of records when required.
- **Audit and Regulatory Access:** The system ensures that authorized staff and regulatory bodies, such as the Curaçao Gaming Control Board, can promptly access necessary records for compliance checks or investigations.

This organizational approach minimizes delays in providing documentation during audits or inquiries and enhances operational efficiency.

Ongoing Monitoring and Compliance

To maintain compliance with record-keeping regulations, we conduct continuous internal monitoring and periodic audits of its record-keeping practices. These evaluations help ensure that:

- Records are retained and managed in accordance with applicable laws and regulations.
- Any gaps or inconsistencies in documentation are promptly identified and addressed.
- The Company remains prepared for inspections or investigations by regulatory authorities.

Benefits of Effective Record Keeping

By implementing robust record-keeping practices, we achieve the following objectives:

- **Regulatory Compliance:** Ensures adherence to Curaçao's AML/CTF/CPF standards and international guidelines.
- **Audit Support:** Provides comprehensive and well-organized documentation to facilitate internal and external audits.
- **Operational Integrity:** Strengthens the Company's transparency and accountability, reinforcing trust with regulators and stakeholders.

Through its commitment to meticulous record management, the Company not only meets legal obligations but also upholds its dedication to maintaining the integrity of the gaming industry.

12. DEFINITIONS

Anti-Money Laundering (AML)

A set of procedures, laws, and regulations designed to stop the practice of generating income through illegal actions.

Counter-Terrorism Financing (CTF)

Strategies and legal frameworks aimed at preventing and disrupting the funding of terrorist activities.

Counter-Proliferation Financing (CPF)

Preventing the financing of the spread of weapons of mass destruction (WMD), including nuclear, chemical, and biological weapons.

Customer Due Diligence (CDD)

The process of identifying and verifying the identity of clients, assessing risks associated with them, and understanding the purpose of the business relationship.

Enhanced Due Diligence (EDD)

Additional verification and monitoring procedures applied to higher-risk clients or transactions.

Simplified Due Diligence (SDD)

A less rigorous form of due diligence applied to low-risk customers and transactions.

Politically Exposed Person (PEP)

An individual who holds or has held a prominent public function and may be more susceptible to involvement in bribery or corruption.

Suspicious Activity Report (SAR)

A report made by a financial institution about suspicious or potentially suspicious activity observed in a customer's account.

Suspicious Transaction Report (STR)

A report that must be submitted when a transaction is suspected to involve money laundering or terrorism financing.

Know Your Customer (KYC)

The process of a business verifying the identity of its clients and assessing potential risks of illegal intentions.

Know Your Business (KYB)

Similar to KYC but applied to business entities to ensure legitimacy and assess associated risks.

Risk-Based Approach (RBA)

Allocating compliance resources proportionally to the level of money laundering, terrorism financing, or proliferation risk posed.

Financial Intelligence Unit (FIU)

A national center responsible for receiving, processing, and analysing suspicious transaction reports.

Money Laundering (ML)

The process of making illegally gained proceeds appear legal.

Terrorist Financing (TF)

Providing or collecting funds intended to be used to carry out terrorist acts.

Proliferation Financing (PF)

Funding the spread and development of weapons of mass destruction.

Weapons of Mass Destruction (WMD)

Weapons that can cause large-scale destruction and loss of life, such as nuclear, chemical, and biological weapons.