

Anti-Money Laundering (AML) Policy and Customer (KYC)

Introduction

Games & More BV, is registered at Hanchi Snoa 19, Trias Building – Curaçao, under Company Registration Number **149948 (0)**. As a Curaçao-based entity, Games & More BV is committed to be full compliance with **Anti-Money Laundering (AML)** and **Counter-Terrorist Financing (CFT)** regulations of Curaçao.

Objective of the AML Policy

The purpose of this AML policy is to ensure the highest level of security for all users by:

- Verifying user identities;
- Preventing the use of the platform for money laundering or terrorist financing;
- Ensuring that deposits and withdrawals are legitimate.

The policy employs a **multi-step verification process** and a **risk-based approach**, considering customer nationality, payment methods, and transaction types, in accordance with Curaçao's AML/CFT framework.

Regulatory Compliance

Games & More BV follows reasonable procedures to manage and reduce money laundering risks. The AML program complies with:

- **National Ordinance on Combatting Money Laundering and the Financing of Terrorism (AB 2019, no. 25)**
 - **National Ordinance on Identification when Rendering Services (LID)**
 - **National Ordinance on the Reporting of Unusual Transactions (NORUT)**
 - **Guidelines from the The Central Bank of Curaçao and Sint Maarten (CBCS)**
 - **Recommendations of the Financial Action Task Force (FATF)**
 - **Caribbean Financial Action Task Force (CFATF)**
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Definition of Money Laundering

Money laundering, as defined under Curaçao law, includes:

- **Converting or transferring property** derived from criminal activity to disguise its origin.
- **Concealing or disguising** the source, location, or ownership of criminal proceeds.
- **Acquiring, possessing, or using** property while knowing its illicit origin.
- **Participating in, aiding, or facilitating** the above actions.

Money laundering is an offense **even if the predicate crime occurred outside Curaçao**, in line with FATF standards.

AML Program Governance

Senior management at Games & More BV is ultimately responsible for AML compliance. An **AML Compliance Officer (AMLCO)** is appointed to enforce AML procedures and report directly to senior management.

Policy Updates and Implementation

AML policies are:

- Reviewed **annually** or when legal/regulatory changes occur.
 - Updated **only with senior management and AMLCO approval**.
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Know Your Customer (KYC) and Verification Process

Step One – Basic Verification

Required for: All users **prior to any withdrawal**.

Process: Customers must provide:

- Full name
- Date of birth
- Nationality
- Gender
- Residential address

Verification: Data is electronically cross-checked via a reputable database. If this fails, a government-issued document (e.g., certificate of registration) must be submitted.

Step Two – Enhanced Verification

Required for:

- Deposits or withdrawals over **USD 1,000**

Documents required:

- A government-issued photo ID (passport, driver's license, or ID card)
 - Proof of address (e.g., utility bill or bank statement dated within the last 3 months)
The ID must show the name, date of birth, nationality, and gender. Other fields may be obscured for privacy.
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Step Three – Source of Wealth Verification**Required for:**

- Deposits or withdrawals over **USD 3,000**

Documents may include:

- Proof of Business ownership
- Payslips or employment contracts
- Inheritance records
- Investment documents
- Proof of Family wealth

Verification: The AMLCO reviews documents and may request additional information. Transactions are held until approved.

Proof of Address**Accepted documents (dated within 3 months):**

- Utility bill
- Bank statement
- Government-issued letter

Documents must clearly show:

- Name
 - Address
 - Date of issue
 - All four corners visible
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Banking Details

To validate deposit and withdrawal sources:

- Customers must use the **same payment method** for deposits and withdrawals up to the deposited amount.
 - A **bank wire or credit card statement** may be requested to verify the legitimacy of the payment method.
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Risk Management

Customers are assigned a **risk level** based on country of residence:

Low Risk

- Jurisdictions with strong AML/CFT regimes (FATF-compliant)
- Standard KYC thresholds apply

Medium Risk

- Jurisdictions with moderate AML/CFT shortcomings
- **Lowered thresholds:**
 - Step Two: USD 500+
 - Step Three: USD 1,500+
- Cryptocurrency users are also considered medium risk

High Risk

- Jurisdictions on FATF high-risk or non-cooperative lists
- **Banned from accessing the platform**

Risk lists are regularly updated per FATF and CBCS guidance.

Additional Monitoring Measures

- An **AI-driven system**, overseen by the AMLCO, detects suspicious patterns (e.g., rapid transactions, inconsistent details, etc.).
 - **Manual reviews** are conducted on flagged transactions and randomly on high-risk accounts.
 - Customers must use **consistent payment methods** to prevent “layering.”
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Transaction Monitoring

Three-Tier Monitoring System

1. **First Line:**
 - Payment Service Providers (PSPs) perform basic KYC checks before deposits reach mintdice.com.
 2. **Second Line:**
 - Automated system flags unusual transactions (e.g., large deposits, behavioral anomalies).
 - Employees review flagged activities using KYC and transaction data.
 3. **Third Line:**
 - Manual reviews of high-risk accounts with Enhanced Due Diligence (EDD).
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Unusual Transaction Reporting

In line with **NORUT**, Games & More BV must report unusual transactions to the **Financial Intelligence Unit (FIU) Curaçao** via the **goAML portal**.

Process:

- Staff are trained to report suspicious transactions to the AML team.
- The AML team assesses risk and determines if a report is warranted.
- Reports must be filed with the FIU **within 10 business days** when required.

The AML team may:

- Submit reports to the FIU
 - Terminate relationships with suspicious users
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Record Keeping

In compliance with Curaçao regulations:

- **KYC records** are kept for **7 years** after account closure
 - **Transaction records** are stored for **7 years** from the transaction date
 - All data is **encrypted and securely stored**
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Employee Training

All relevant staff receive:

- **Annual training** on AML/CFT laws
- **Onboarding sessions** tailored to their roles

Training is conducted by an AML specialist from Games & More BV's team.

Internal Auditing

Regular internal audits ensure AML policy compliance. Findings are reported to:

- **Senior management**
- **AMLCO**

Audits inform policy improvements and corrective actions.

Data Security

Customer data is handled under Curaçao law and global best practices:

- Data is **encrypted** and stored securely
 - Not shared with third parties unless:
 - Legally required
 - Needed to prevent money laundering
 - Shared with FIU or law enforcement when mandated by law
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Contact Us

For general AML/KYC questions:

 gmbvcuracao@gmail.com

For complaints regarding AML/KYC procedures or account reviews:

 gmbvcuracao@gmail.com
