

Anti-Money Laundering (AML) Policy –

Simplified version for Bet Pegasus website

1. Our Commitment

We are committed to preventing our platform from being used for money laundering, terrorist financing, or any other criminal activity. We operate a risk-based Anti-Money Laundering (AML) and Counter-Terrorist Financing (CFT) program in line with applicable laws and regulatory requirements in Curaçao.

We fully comply with our obligations under the Curaçao regulatory framework and cooperate with competent authorities, including the Financial Intelligence Unit (FIU), where required.

2. What is Money Laundering?

Money laundering is the process of making illegally obtained funds appear legitimate. It typically involves:

- **Placing** illegal funds into financial systems
- **Moving** funds to obscure their origin
- **Using** the funds as if they were legitimate

Terrorist financing and proliferation financing involve the use of funds (whether legal or illegal) to support unlawful activities.

3. Risk-Based Approach

We apply a **risk-based approach**, as required under Curaçao regulations. This means the level of checks and monitoring depends on the level of risk associated with each customer and transaction.

We consider factors such as:

- Customer behaviour and activity
- Payment methods used
- Geographic location
- Type of products used

This ensures that higher-risk situations are subject to enhanced controls.

4. Customer Identification and Verification (KYC)

To use our services, customers **must register and provide accurate personal information**, including:

- Full name
- Date of birth
- Residential address
- Contact details

We **identify and verify the identity of all customers using reliable and independent sources**, including official documentation such as identification and proof of address.

Customer verification is a **mandatory requirement** and is carried out:

- When establishing the business relationship
- When financial transactions meet or exceed applicable thresholds
- Where there is a suspicion of money laundering or terrorist financing
- Where there are doubts about previously obtained customer information

Customers who do not complete the required verification process will have their accounts restricted or suspended until verification is completed.

5. Customer Due Diligence

We apply Customer Due Diligence (CDD) measures to understand our customers and assess risk.

Standard Due Diligence

All customers are subject to identity verification and ongoing monitoring.

Enhanced Due Diligence

Additional measures are applied where higher risk is identified, including:

- Verification of source of funds
- Requests for additional information or documentation
- Increased monitoring of account activity

If we are unable to verify a customer's identity or the legitimacy of their funds, the business relationship will not be established or will be terminated.

6. Monitoring and Controls

We continuously monitor customer activity to detect unusual or suspicious behaviour, including:

- Large or unusual transactions
- Minimal gameplay combined with significant deposits or withdrawals
- Use of multiple or third-party payment methods
- Activity inconsistent with a customer's profile

Where concerns are identified, we take appropriate action, which may include:

- Requesting additional information
- Applying account restrictions
- Reporting to relevant authorities in accordance with our legal obligations

7. Politically Exposed Persons (PEPs)

Customers identified as **Politically Exposed Persons (PEPs)**, or those closely associated with them, are considered higher risk.

Such customers are subject to:

- Enhanced due diligence
- Ongoing monitoring
- Additional internal review before continuing the business relationship

8. Sanctions Compliance

We comply with all applicable sanctions laws, including United Nations and European Union measures.

All customers are screened against sanctions lists on an ongoing basis.

We do not permit accounts or transactions involving:

- Individuals or entities subject to sanctions
- Persons associated with prohibited or high-risk jurisdictions

Where a sanctions match is identified, we take immediate action, including account restriction and reporting to the relevant authorities.

9. Prohibited Customers

We do not permit:

- Individuals under the legal gambling age
- Customers whose identity cannot be verified
- Individuals linked to criminal activity
- Customers from restricted or high-risk jurisdictions, where required by law or regulation

Accounts may be suspended or terminated where these conditions are not met.

10. Reporting Suspicious Activity

We are legally required to report suspicious or unusual activity to the relevant authorities, including the Financial Intelligence Unit in Curaçao.

Such reporting is carried out **without informing the customer**, in accordance with applicable laws.

11. Ongoing Compliance

We maintain internal policies, procedures, and controls to ensure ongoing compliance with AML/CFT obligations, including:

- Regular risk assessments
- Staff training
- Continuous monitoring and improvement of our systems

We retain customer identification data, transaction records, and relevant documentation for the period required under applicable laws and regulations.

12. Contact

For any questions regarding this policy, please contact our support team.