

Gleneagles B.V.

Anti-Money Laundering & Counter-Terrorist Financing (AML/CFT) Policy and Procedures Manual

Effective Date: January 2025

Company Registration Number: 158256

Registered Address: Willemstad, Curaçao

I. Preface

Gleneagles B.V. operates under the regulatory supervision of the Curaçao Gaming Authority (CGA) and is committed to full compliance with the National Ordinance on the Identification of Clients when Rendering Services (LID) and the National Ordinance on the Reporting of Unusual Transactions (LMOT). This manual outlines the company's AML and CFT framework in accordance with the CGA's AML Policy Template and guidance.

II. Legal and Regulatory Framework

The company complies with Curaçao laws and international standards including LID (P.B. 1996, no. 151), LMOT (P.B. 1996, no. 149), FATF 40 Recommendations, EU 6th AML Directive, and CGA AML/CFT Supervision Guidelines (2025 Edition).

III. What is Money Laundering and Terrorist Financing?

Money Laundering disguises illicit funds through placement, layering, and integration. Terrorist Financing involves providing or collecting funds to support terrorist acts or organizations.

IV. Governance and AML Roles

Board of Directors: ultimate responsibility for AML compliance.

MLRO: Responsible for oversight and reporting to FIU Curaçao.

Compliance Officer: supports MLRO in control monitoring and enforcement.

All Employees: must follow AML procedures, complete training, and report suspicious activities.

V. Risk-Based Approach (RBA)

The company applies Business Risk Assessment (BRA) and Customer Risk Assessment (CRA) models evaluating product, payment, and jurisdiction risks. Each player is assigned a Low, Medium, or High risk rating determining the required level of due diligence.

VI. Customer Due Diligence (CDD)

CDD includes verifying full identity, nationality, address, and source of funds via Sumsb (ID & liveness) and Trulioo (address verification). EDD applies to high-risk clients, including additional proof of wealth. Simplified Due Diligence applies where risk is demonstrably low.

VII. Transaction Monitoring and Controls

All deposits and withdrawals are monitored. Closed-loop withdrawal enforcement ensures funds return to original payment methods. AI-based monitoring detects anomalies and alerts are reviewed daily by the MLRO.

VIII. Suspicious Transaction Reporting (STR)

Employees report suspicious activities to MLRO within 24 hours. MLRO evaluates and, if necessary, files STRs with FIU Curaçao. Tipping-off is strictly prohibited.

IX. Record Keeping and Data Protection

CDD and transaction data retained for 5 years; STR records for 10 years. Data stored securely on ISO 27001-certified servers within the EU with restricted access.

X. Staff Training and Competence

All staff undergo annual AML/CFT training with case studies. MLRO and Compliance Officer complete advanced certifications (e.g., ICA, ACAMS). Training records maintained by HR.

XI. Independent Audit and Continuous Improvement

Quarterly reviews by MLRO and annual external AML audit to ensure compliance effectiveness. Findings presented to the Board for corrective action.

XII. Enforcement and Disciplinary Measures

Non-compliance is treated as severe misconduct. Disciplinary actions may include retraining, termination, and reporting to CGA or FIU Curaçao.