



KYC Policy

For the offering of Online Gambling Under Licence From CGB

POL-CU-KYC-01

Current Version

Version	V1.0
Version Date	12-05-25
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1. Overview

1.1 Introduction

Bull Gaming NV ("The Company/ Rollbit/ us/ our/ we") has developed and put into effect this Know Your Customer Policy (hereinafter referred to as the KYC Policy) to mitigate the integrity risks associated with providing licensed online gambling services in Curacao.

We seek to offer the highest security to all of our users and customers on Rollbit.com. For that, a five-step account verification is done in order to ensure the identity of our customers. The reason behind this is to prove that the details of the person registered are correct and the deposit methods used are not stolen or being used by someone else, which is to create the general framework for the fight against money laundering and terrorism financing.

We also take into account that depending on the nationality and origin, different safety measurements must be taken. Rollbit.com also puts reasonable measures in place to control and limit risks related to KYC, including dedicating the appropriate means.

Rollbit.com is committed to high standards of anti-money laundering (AML), of which KYC is a crucial part of, according to EU and other international guidelines, compliance, and requires management and employees to enforce these standards in preventing the use of its services for money laundering purposes.

In accordance with the AML legislation, the board of directors of Bull Gaming N.V. is responsible for the prevention of money laundering on Rollbit.com. The AML Policy has received approval from the Company's directors and is aligned with the broader compliance framework governed by the applicable laws and regulations for providing licensed online gambling services in Curacao. Each major change of Rollbit.com AML policy is subject to approval by the managing director of Bull Gaming N.V.

1.2 Legal Scope

The primary legislation regulating the online gambling industry in Curacao is the National Ordinance on Offshore Games of Hazard (Landsverordening buitengaats hazardspelen). Additional laws and regulations on which this Policy is based consist of:

Laws and regulations	Abbreviation
the National Ordinance Identification for Services (Landsverordening identificatie bij dienstverlening, PB 2017, no. 92, GT);	NOIS
the National Ordinance Reporting Unusual Transactions (Landsverordening melding ongebruikelijke transacties, PB 2017, no. 99, GT);	NORUT
the Sanctions National Ordinance (Sanctielandsverordening, PB 2014, no. 55, GT);	SNO
the Kingdom Sanction Law	KSL

Unless specified, this Policy refers to the above legislation as "applicable laws and regulations".

1.3 Definitions and abbreviations

"Gambling interface" the whole of electronic communication with which we offer the licensed games of chance;

"Games of chance by means of distance communication": a game of chance that is organised remotely on the basis of the license;

"Hyperlink" includes an active icon;

"Licensee": the holder of a license granted pursuant to the NOOGH;

"Online Gambling" means any gaming, where any player enters or may enter the game, or takes or may take any step in the game, by means of a telecommunication, the negotiating or receiving of any bet by means of a telecommunication, or any lottery in which any participant acquires or may acquire a chance by means of a telecommunication

"Player": the person who is registered as a player with the licensee;

"Player account": the account held by the licensee in the name of a player with the playing balance of that player, which is used exclusively for the purpose of participating in the licensed games of chance and which can be traced back to the player;

"player interface": the part of the gambling interface accessible to the player after registration;

"**Website**", means an electronic communication or set of electronic communications which complies with the Hypertext Transfer Protocol and may be accessed and viewed in visible and legible form by any person having ordinary access to the global system of intercommunicating computers known as the Internet.

Definition	Abbreviation
Anti-Money Laundering	AML
Business Risk Assessment	BRA
Customer Due Diligence	CDD
Counter Funding of Terrorism	CFT
Customer Risk Assessment	CRA
Enhanced Due Diligence	EDD
Financing of Proliferation	FP
Curaçao Gaming Control Board	GCB
Know Your Customer	KYC
Money Laundering	ML
Politically Exposed Person	PEP
Source of Funds	SOF
Source of Wealth	SOW
Terrorism Financing	TF

2. The Policy

2.1 Definition of Know Your Customer (KYC)

Know Your Customer, or KYC, is a compliance measure where the aim is to identify users and verify this identity before they enter a business relationship with an operator or during it in some cases. Under the Curacao regulations, the KYC requirements are a part of the wider AML/CFT/CFP framework designed to combat money laundering, terrorism financing and financing of proliferation. Knowing who your customers are to the best of your capabilities is a key first line of defence to prevent nefarious actors from using your services.

Commonly the KYC process includes collecting basic information from the user as well as using identification and other documents to verify they are who they claim to be. This also helps the operator to filter out individuals who are not allowed to use their services for any reason and to create an initial risk profile on the customer, helping them to determine if further checks and verifications are necessary.

The KYC process is of course not limited to just the initial checks, but it is rather an ongoing process which in some cases takes place throughout the lifecycle of the user. Should their circumstances or the regulatory environment change, this might require further or additional KYC checks. It is also important that alongside regulatory and legislative updates, the operator stays on top of the industry best practices in order to maintain the integrity of not only themselves but the industry as a whole.

2.2 Player Acceptance

Rollbit.com does not accept players who are:

- residents of Curacao;
- under the age of 18;
- an employee or any key person of the company;
- players who have excluded themselves from participation as long as the self-exclusion period is in place.

In addition, Rollbit.com will not accept and will block the users who:

- Do not provide the identification information requested by Rollbit.com;
- Provide fake identification documents;
- Try to use different means to deceive about their location;
- Are from restricted or prohibited jurisdictions; or
- Are subjected to United States, European Union, or other global sanctions or watch lists;
- Are gambling addicts or have mental health issues;

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- Its source of funds are originated or exchanged in restricted jurisdictions;

Rollbit.com reserves the right to block and suspend players for any other reasons at its own description.

Players can only play for real money if they have registered successfully as a player.

2.3 Player account

Every player is assigned a unique player account after completing their registration on Rollbit.com. The following main conditions to each player account apply:

- All payment transactions between the licensee and the player are carried out exclusively through the player account;
- Rollbit.com does not grant credit to players directly or indirectly, whether or not via intermediary;
- We do not allow a negative balance on the player's player account;
- We do not allow a player to participate in a game of chance if the balance on the player account is insufficient to cover the wager.
- We ensure that all players personal data and transactions are processed and stored in a safe and secure manner;
- We ensure that it always has sufficient funds to pay out the prize money;
- We hold a segregated account for player deposits and winnings;
- We do use intermediaries for player transactions;
- Bets and or wagers are made in the currency \$USD;
- Real currencies used by us must be tradeable on international markets;
- Virtual currencies used by us must be tradeable on internationally licensed virtual currency exchanges;
- We cannot exchange currencies in a player's account, provided that such exchange does not include instruments for tokenization;
- The prize money is payable in the same currency that was used to play the game.;
- We provide the player at all times with access to the necessary information relating to the player account and the changes to the player account. This information shall in any case include:
 - a. the current balance of the player account;
 - b. the opening balance of the player account at the most recent login;
 - c. the total stake since the most recent login;
 - d. the total profits and the total losses since the most recent login;
 - e. an overview of all transactions on the player account for a period of at least the last 90 days;
 - f. within how much time after the end of the game the prize money will be available;
 - and
 - g. for how long the prize money remains available, provided that such a period is not less than 30 months from the date it was awarded.

2.4 Customer Due Diligence (CDD)

At account opening, Rollbit.com collects documentary and non-documentary information:

- Collecting baseline (e.g., wallet address, email address) information at account creation through Rollbit.com's user onboarding portal;
- Monitoring the risk profile associated with the underlying cryptocurrency wallet used to fund the user's account;
- Maintaining records of the information used to identify the user; and
- Determining if a user appears on any list of known or suspected terrorists or terrorist organisations provided to the financial institutions based on the above information.

The above steps are operationalized using the following measures:

- **Identity and Age Verification:** the following information will be at a minimum collected for identification of the player:
 - Full name;
 - Permanent residential address;
 - Date of birth;
 - Place of birth;
 - Nationality; and
 - Identity number.

* For a low risk player profile, the full name, permanent residential address and date of birth is sufficient.

*For high risk players, the above mentioned information might not suffice and the need to request additional information arises.

A third-party service provider will support Rollbit.com's ability to determine the legitimacy of the identification information other KYC materials or information provided and will confirm that the user is permissible. The service provider also will confirm that the user does not appear to be located in a comprehensively sanctioned or otherwise prohibited jurisdiction and will search global sanctions lists to confirm that the user does not appear thereon using onboarding information such as wallet addresses.

- **Customer Information:** Rollbit.com will collect details on each user to form a reasonable belief that Rollbit.com knows the identity of its users commensurate with the user's risk profile. For instance, Rollbit.com may collect such details as the wallet address, name, address, country, date of birth, or postal code (collectively, "KYC Information").
- **Beneficial ownership:** Rollbit.com will take all necessary measures to verify the identity of the beneficial owner(s) for all persons holding 25% or more of the shares or voting rights and for any person who exercises the ultimate effective control of the customer. This will go as far as understanding the ownership and control

structure of the customer in case of legal persons and legal arrangements. The obtained information and data need to be coming from a reliable source to be able to successfully verify the identity of the beneficial owner(s).

CDD will be performed at any time when:

- Customers engage in financial transactions equal to or above NAf. 4,000;
- There is a suspicion of money laundering or terrorist financing; or
- The casino has doubts about the veracity or adequacy of previously obtained customer identification data.

A transaction can be a single transaction or a series of transactions, leading to the equal amount of NAf. 4,000 or above.

If the requested information and documentation is not received within 30 days from the moment the NAf. 4,000 threshold was met, the Company will terminate the relationship with the customer and report the transaction to the FIU.

2.5 Enhanced Due Diligence

High risk customers will undergo a Enhanced Due Diligence to determine whether their behaviour and transactions are unusual and need to be acted on accordingly.

In any case, EDD will be conducted where the ML/TF risks are higher, such as:

- Residents of higher risk geographic areas;
- PEP's
- Product or transactions that might favour anonymity;
- New products and new business practices and the use of new or developing technologies for both new and pre-existing products.

Rollbit.com performs ongoing monitoring on its users in order to detect any behaviours or indicators that might raise suspicions in regard to money laundering and terrorism financing practices. For that purpose, Rollbit.com has implemented a set of red flag indicators that help it determine such behaviours and require further action from Rollbit.com in assessing the customer information.

Whenever one of those red flags is triggered, the user account will be suspended and Rollbit.com will pursue enhanced due diligence. Enhanced due diligence under this policy is deemed to include, but not limited to, the provision of:

- Full legal name;
- Country of citizenship;
- Permanent Address (which, for an individual, must be a residential or business street address, and for an entity, must be a principal place of business, local office or other physical location);
- Identification number (either a taxpayer identification number, or, if unavailable, a passport number and country of issuance, alien identification card number or number and country of issuance of another government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard);

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- Identification Document;
 - Reason for intended or performed transactions;
 - Source of Funds and Source of Wealth.

Rollbit.com may use third-party service providers to verify any of the above information as determined to establish a reasonable basis to know the true identity of the user where the user's activity warrants such action.

The approval of senior management of Rollbit.com is needed to decide on any change in the business relationship.

3. Recordkeeping

3.1 Keeping of records

The Company will maintain comprehensive records related to customer due diligence, enhanced due diligence and any other relevant documentation.

Records will be retained for a minimum period of 5 years after the business relationship is ended or after the transaction date.

The records will be easily accessible to authorised personnel and relevant regulatory authorities for inspection or audit purposes.