
Responsible gambling policy

Owner	Author	Board Approval	Review Date	Next review date	Version	Comment
Nominated Officer/MLRO	DT	13/03/2024	13/03/2024		V1.0	New Document
Nominated Officer/MLRO	LNS	29/04/2026	29/04/2026	29/04/2027	V2.0	New template used to align with new company documentation Details of Nominated Officer

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1. Introduction

1.1. The aim of this policy is to manage potential harm associated with gambling by creating a responsible gambling environment and create awareness of Dynamik Marketing platforms facilities to stop gambling additions.

1.2. The company will always ensure that prevents and mitigates gambling related

2. Regulatory Framework

2.1. This policy is designed to comply with:

- Curacao Gaming Control Board supervisory requirements
- National ordinance for Games of Chance
- Applicable AML/CFT obligations aligned with FATF recommendations

3. Report Main Page form

3.1. The report main page shows the report headers, the reporting person and the location sections of the report. The report type is displayed at the top and right below from the left to the right the local currency, code, the reporting entity, entity ID and the report ID for the current report.

goAML Web New Report Form Mant

Unusual Transaction Report

Local Currency Code: ANG	Reporting Entity: General	Entity ID: 48	Report ID: 530-0-0
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Reporting Entity Branch is required!

Reporting Entity Reference is required!

* Submission Date 11/24/2020

FIU Reference Number

Reason is required!

Action

Report Header

3.2. Reporting person. When a form is first loaded, the reporting person section is auto-populated with the details of the usual that is logged in.

This reporting person cannot be edited in the same way that other person objects can be. Once the form is saved, the Reporting Person Details will stay the same. However, if you want to change the Reporting Person Details with a different Reporting Person Details that has the report open for editing, this can be done by clicking on the Load Current User button in the top right of the Reporting Person collection.

Unusual Transaction Report

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Reporting Entity Branch is required!

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* Submission Date
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FIU Reference Number

Reason is required!

Action

▼ Reporting Person

Title

BBLISF20

* First Name

BBLISF20

* Last Name

FIUCur

Email

goamlcw20+BBLISF@GMAIL.COM

* Gender

Female

* Birth Date

9/14/2000

* ID Number

2000091423

Nationality

NETHERLANDS

Occupation

ITS Services

Passport Number

Passport Country

[Load current user](#)

▼ Reporting Location

Type is required!

Address is required!

Town

City is required!

Zip

* Country

CURAÇAO

State

Report Main Page

3.3. A confirmation dialog will be displayed asking if you wish to replace this Reporting Person Details with the details of the current user.

Load current user

×

Do you wish to replace the existing Reporting Person details with those of the current user: johnsmithbank

No

Yes

Select YES to make the replacement

Internal Use Only

V2.0

Dynamik Marketing B.V

3.4. Attachments. Selecting the attachments tab will show the attachments upload form. The total number of attachments uploaded to the report is shown in a badge next to the attachments header.

3.5. Attachment form displays a list of the attachments that have been uploaded for the report. Each attachment can be deleted by clicking the delete button and new attachments can be uploaded by clicking the add button in the top right of the form.

4. Indicators Tab

4.1. Selecting the indicators tab will show the indicators selection form. The total number of indicators that have been selected for the report is shown in a badge next to the indicator's header.

4.2. The indicators form allows the navigation, selection and deletion of report indicators associated with the report. To select an indicator, check the box on the left of the indicators code in the main list.

Unusual Transaction Report

Indicators

A0000114 ✕
A0000133 ✕

☐	Code	Indicator
☐		
☐	-	Other
☐	A	A - ALL INDICATORS BELOW ARE RELATED TO ADMINISTRATORS INVESTMENT INSTITUTIONS
☒	A0000114	A0000114 - An intended transaction carried out by or for the benefit of a person, legal person, group or entity that is mentioned on a list compiled in pursuance of the Sanctions National Ordinance.
☒	A0000133	A0000133 - A cash transaction amounting to Naf 20,000.00 or more whereby the administrator is directly or indirectly involved.
☐	A0000211	A0000211 - A transaction giving cause to assume that it may be connected with money laundering or terrorist financing.
☐	B	B - ALL INDICATORS BELOW ARE RELATED TO PROVIDERS OF BANKING SERVICES
☐	B0000111	B0000111 - A transaction which is reported to the police or judicial authorities in connection with money laundering or the financing or terrorism.

Indicator Form

5. Transactions

5.1. Selecting the transactions list tab will show the list of transactions in a grid containing the trans mode (code (bi-party/multi-party) transactions number, date and amount and trans-mode code (symbol for bi-party/multi-party) for each transaction.

The total number of transactions in the report is shown in a badge next to the transaction's header the total amount of all the values of the transactions in the report are shown on the right of the tab.

Internal Use Only

V2.0

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5.2. The actions on the transactions list are:

	Expand / Collapse Expand or collapse the transaction trees in the navigator. When the trees are collapse there is only a tab for each transaction in the list under the Transactions List tab.
	Download all the transactions in the report <i>See the section below on uploading/downloading transactions</i>
	Upload transactions <i>See the section below on uploading/downloading transactions</i>
	Create a new Bi-Party transaction
	Create a new Multi-party transaction

5.3. One transaction per report is permitted for Unusual Transaction Reports (UTR). Multiple transactions are permitted per report for Unusual Transaction 211 (UTR211)

5.4. Selection the transaction tab, the transaction form is edited for that particular transaction. When a transaction is populated (by hovering over the transaction), a sub-tab is created under the transaction tab for each account, person or entity that is added to the transaction.

5.5. Once a transaction is added the transaction form will be shown. The fields which are mandatory will be displayed in pink with a red.

5.6. To upload a transaction, you need to make sure the XML is correct. Each transaction should be inside a <transaction> tag and must follow the goAML schema structure, however it does not have to be valid, i.e. the data doesn't have to be complete or conform to the restrictions of the schema such as mandatory, min/max, decimal, etc...

Transaction

Number is required! Internal Reference Number Transaction Type is required!

Local Amount is required! Date is required! M/d/yyyy * Intended Transaction (Check for Yes) Posting Date M/d/yyyy

Description is required!

Time of Transaction (HH:MM) is required!

From Account known for Person/Entity Account known for Person/Entity (My Client) Person Person (My Client) Entity Entity (My Client)

To Account Account (My Client) Person Person (My Client) Entity Entity (My Client)

+ Goods and Services

To and From sections

5.6. Multi-party transactions appear the same, except there is a section for Involved Parties instead of the From and To sections

Involved Parties

Account Account (My Client) Person Person (My Client) Entity Entity (My Client)

Involved Parties section

5.7. To add a party to either the **From**, **To** or **Involved Parties** select one of the 6 buttons Account, Account My Client, Person, Person My Client, Entity or Entity My Client. Mandatory fields are shown by a red asterisk next to the field name. If there are validation errors on the field the field is highlighted pink and the error shown in place of the field name.

Hoovering the mouse pointer over the field name provides a tooltip for some fields. There may be extra information available here to determine what values should be entered. Tooltips also show the error messages if there is not enough room to show them in the form.

6. Further information and contact details

6.1. For more information on goAML, the FIU Curacao is available at goaml@fiucuracao.cw or by phone (+5999)462588

6.2. For general questions, they can be reached on info@fiucuracao.cw for general questions or supervision@fiucuracao.cw for matters concerning the Supervisory Department or analysis@fiucuracao.cw for matters concerning the Analysis Department

6.3. Further information can be found here:

Information

- [Announcements](#)
- [Guidance](#)
- [Instructional Videos](#)

6.4. If you need to contact your MLRO you can do so on the details below:

Leyre N'Shimbi Fernandez. Email: leyre@sharpklick.com or +447624426488

7. REVIEW AND MONITORING

7.1. This policy is a living document designed to evolved alongside the business operations, regulatory environment and risk profile. While the fundamental principles will remain constant, periodic reviews are required to ensure alignment with legislation, regulation, business processes and risk appetite. This policy will be formally reviewed at least annually, or earlier if material changes occur in applicable regulations, internal controls or identified risks.

7.2. Any updates or amendments will be documented, version controlled and communicated to interested parties.

7.3. The latest approved version of this policy is available to all staff via the company's SharePoint site and it is the responsibility of each staff member to familiarise themselves with the most current version.

7.4. Evidence of review and Board approval (where required) will be retained to support ongoing oversight and demonstrate compliance with governance requirements.