

Segregation Policy

1. Segregation - Player Funds

Player deposits will be deposited into segregated client trust accounts at regulated banking institutions.

These accounts are non-operational, ensuring no merging with operational cash flows or corporate funds. Segregation may be documented via monthly bank reconciliations and internal audit trails. All bank accounts will be maintained in compliance with CGA requirements, and bank statements will be retained for audit purposes.

2. Safeguarding and Security Measures

Player funds will be stored in escrow or trust accounts compliant with international standards.

The company may collaborate with Tier-1 financial institutions for enhanced security and fund protection.

All electronic transfers will be secured using strong level encryption, multi-factor authentication, and secure payment gateways.

The company will employ real-time transaction monitoring for suspicious activities, such as rapid large deposits or withdrawals, money laundering attempts, and third-party transactions.

3. Payout Processing

Withdrawal requests will be subject to review processes, including KYC (Know Your Customer) and AML checks.

Player credits will be kept completely separate from the operational funds. All player balances will be securely tracked in the management system, and the Casino will regularly reconcile these records to make sure that every credit is fully covered.

Player funds will be held safely in dedicated accounts and protected by strict access controls and security measures. When a player requests a payout, the Casino will proceed with the identification/ verification procedures and process the payment through approved and secure methods.

The finance and compliance teams will regularly review these processes to ensure the Casino meets all regulatory and safeguarding requirements.

Payouts may be processed via wire transfer, e-wallet, other approved payment methods, or other approved payment solutions, based on the player's selected method.

All payout transactions will be recorded in the casino's financial management system with audit logs.

Funds will be released only after successful verification/ manual verification, exceptions will be also escalated for manual review.

4. Compliance, Internal Controls & Audits

The company will comply with CGA license conditions, including fund segregation and financial transparency.

The process may include internal audits and/or external audits which can be conducted by licensed, independent audit firms.

Discrepancies or irregularities will be immediately reported to regulatory authorities and rectified.

5. Record Keeping & Data Management

All deposit, withdrawal, transfer, and reconciliation records will be maintained electronically in secure, encrypted databases for a minimum period in accordance with the regulatory requirements.

Transaction details will include client ID, deposit/withdrawal amount, date/time, payment method, transaction ID, and approval status. Audit trails for all fund movements can be maintained for traceability and regulatory review.

Records will be accessible only to authorized compliance and finance personnel.

6. Risk Management & Internal Controls

The company may also implement segregation controls within the financial management system (FMS).

In this scenario, transaction monitoring tools will flag suspicious activities, including deposits or withdrawal patterns.

Staff handling funds undergo regular AML/KYC training and are bound by confidentiality agreements.