

Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policy

Company Name: Noah Time B.V.

Company Registration Number: 161327

Office Address: Hanchi Snoa 19, Trias Building, Curaçao

Effective Date: 18 Sep 2025

Next Review Date: 18 Sep 2026

Approving Official(s): Derek Hendriks

Responsible Office: AML/Compliance Department

1. Policy Statement

Noah Time B.V. is fully committed to preventing money laundering, terrorist financing, and proliferation financing. This policy applies to all employees, contractors, and third-party partners of the company. The company adopts a risk-based approach in compliance with the Curaçao Gaming Authority (CGA) requirements, the National Ordinance on the Prevention and Combating of Money Laundering and Terrorist Financing (NOPMLTF), and other applicable laws and regulations.

2. Purpose

This policy establishes the framework for identifying, preventing, and mitigating the risks of money laundering and terrorist financing within the company's operations. It ensures that Noah Time B.V. maintains full compliance with CGA regulations, implements effective internal controls, and safeguards the integrity of its products and services.

3. Audience

This policy applies to:

All company employees, including management.

Subcontractors and consultants engaged by the company.

Third-party suppliers and service providers acting on behalf of the company.

4. Definitions

ML/TF: Money Laundering and Terrorist Financing.

CDD: Customer Due Diligence.

EDD: Enhanced Due Diligence.

PEP: Politically Exposed Person.

FIU: Financial Intelligence Unit Curaçao.

AMLCO: Anti-Money Laundering Compliance Officer.

5. Policy Implementation

5.1 Business Risk Assessment

The company performs an Enterprise-Wide Risk Assessment (EWRA) at least annually to identify inherent ML/TF risks across its business lines, customer types, geographic exposure, and delivery channels. The EWRA informs the design of policies, controls, and procedures to mitigate identified risks.

5.2 Customer Risk Assessment (CRA)

A Customer Risk Assessment is conducted during onboarding. Customers are categorized into low, medium, or high risk depending on factors such as nationality, source of funds, transaction behavior, and payment method.

5.3 Customer Acceptance Policy (CAP)

- Customers from sanctioned or high-risk jurisdictions (as identified by FATF lists) are rejected.
- PEPs are subject to Enhanced Due Diligence (EDD).
- All customers must undergo verification before being permitted to transact.

5.4 Customer Due Diligence (CDD)

- Step 1 Verification: Required for all customers. Collect name, DOB, nationality, gender, address.
- Step 2 Verification: For deposits/withdrawals > USD 2,000. Requires government-issued ID and proof of address.
- Step 3 Verification: For deposits/withdrawals > USD 5,000 or transfers > USD 3,000. Requires Source of Wealth (SoW) documentation.
- SoW Examples: Employment, business ownership, inheritance, investments, family support.
- All customers are screened against PEP and sanctions lists.
- Accounts may be frozen, and reports submitted to FIU if suspicion arises.

5.5 Ongoing Monitoring

- Automated systems monitor customer transactions for unusual patterns.
- Red flags include: rapid deposit/withdraw cycles, mismatched accounts, cryptocurrency conversions.
- Alerts are reviewed by staff and escalated to AMLCO when necessary.

5.6 Reliance on Third Parties

Where reliance on third parties (e.g., Payment Service Providers) is necessary, Noah Time B.V. ensures they are regulated entities with effective AML policies. Written agreements specify AML responsibilities.

5.7 Reporting of Unusual Transactions

- Employees must escalate unusual activity to the AMLCO.
- The AMLCO determines if a Suspicious Transaction Report (STR) is submitted to the Curaçao FIU.
- All STRs and internal reports are kept confidential for 10 years.

5.8 AML/CTF Compliance Program

- The company maintains a comprehensive compliance program including:
- Appointment of an AMLCO, reporting to senior management.
- Training programs: mandatory annual training for all relevant employees; induction sessions for new staff.
- Independent audits: periodic internal/external audits to test effectiveness.

- Record keeping: KYC and transaction records retained for 10 years.
- Account freezing/termination procedures in case of ML/TF suspicion.

6. Compliance and Consequences of Non-Compliance

Failure to comply with this policy may result in:

- Disciplinary measures, including termination of employment.
- Regulatory sanctions, fines, and suspension of the company's license.
- Criminal liability under Curaçao law.

7. Related Information

- National Ordinance on the Prevention and Combating of Money Laundering and Terrorist Financing (NOPMLTF).
- CGA AML/CFT Guidelines.
- FATF Recommendations.

8. Contact Information

For any questions regarding this policy, please contact:

AML/Compliance Officer: Derek Hendriks

Phone number: Available upon request

Email: support@ppwin.com

9. Policy History

Version 1.0 (13/09/2024): Initial AML/KYC Policy

Version 2.0 (08/08/2025): Revised AML/KYC Policy (rejected by CGA).

Version 3.0 (Current): Revised policy aligned with CGA template.

10. Policy URL (if applicable)

www.ppwin.com