

LOSARTEZ B.V.
CUSTOMER RISK RATING MATRIX

DOCUMENT CONTROL

Version	Version Date	Approved By
1.0	30 March 2026	The Board

1. INTRODUCTION

This Customer Risk Rating Matrix provides a standardised methodology for assessing individual customer money laundering and terrorist financing (ML/TF) risk for Losartez B.V., a Curaçao Gaming Authority (CGA) licensed online gaming operator. The Matrix is applied during customer onboarding and ongoing relationship review to determine whether Simplified, Standard, or Enhanced Due Diligence applies to each customer.

This document is an operational tool maintained by the Compliance Officer. For full Customer Due Diligence (CDD) procedures, refer to the AML/CFT Policy. For enterprise-level risk context and inherent business risks, refer to the Business Risk Assessment (BRA).

2. RISK RATING METHODOLOGY

Each customer is scored across eight risk factors. Each factor is rated Low (1 point), Medium (2 points), or High (3 points). The score for each factor is multiplied by its assigned weight, and the weighted scores are totalled to produce an overall customer risk rating of Low, Medium, or High. The resulting rating determines the level of CDD applied in accordance with the AML/CFT Policy.

3. CUSTOMER RISK FACTORS

The following risk factors and scoring criteria apply to all customers of Losartez B.V.

Risk Factor	Weight	Low Risk (1)	Medium Risk (2)	High Risk (3)
A. Customer Type	1	Individual, recreational player, employed with identifiable income source.	Self-employed, business owner, higher net worth individual.	Politically Exposed Person (PEP), family member or close associate of PEP, legal entity, trust, or nominee arrangement.
B. Geographic Risk: Customer Location	2	EU/EEA countries, jurisdictions with equivalent AML frameworks.	Non-EU countries not on FATF lists, jurisdictions with developing AML frameworks.	High-risk third countries per EU lists, jurisdictions with known ML/TF concerns.
C. Geographic Risk: Nationality	1.5	Nationality from low-risk jurisdiction.	Nationality from medium-risk jurisdiction, dual nationality involving one higher-risk country.	Nationality from FATF-listed jurisdiction or jurisdiction with known ML/TF concerns.
D. Product Usage	1.5	Casual player, low-frequency deposits, standard betting patterns.	Regular player, moderate deposit frequency, uses multiple products (casino, sports betting, live dealer).	High-volume player, VIP/high roller status, uses all products extensively, rapid cycling of funds between products.
E. Payment Method	2	Bank transfer from verified bank account, regulated payment provider in equivalent jurisdiction.	Credit/debit card, regulated e-wallet.	Cryptocurrency, prepaid cards, third-party payments, multiple payment methods used in short period without reasonable explanation.
F. Transaction Behaviour	2	Consistent with player profile, proportionate to declared income/occupation, stable patterns over time.	Occasional spikes in activity, minor inconsistencies with profile, moderate structuring indicators.	Patterns inconsistent with profile, structuring behaviour, rapid deposit-withdrawal cycles with minimal play, significant unexplained changes in activity.
G. Source of Funds / Source of Wealth	1.5	Salary or pension from verifiable employer, documented and consistent with declared occupation.	Self-employment income, investment returns, inheritance (with documentation).	Unclear or undocumented source, cash-intensive business, high-risk industry, inconsistent with declared occupation.
H. Account Behaviour	1	Single account, consistent login patterns, single device or IP range.	Occasional IP changes, multiple devices (reasonable for travel or device upgrades).	Multiple accounts (attempted or detected), frequent IP/location changes inconsistent with profile, VPN usage, device spoofing indicators.

4. RISK RATING THRESHOLDS

The total weighted score determines the customer's overall risk rating as follows:

- LOW RISK: Total weighted score 8–13 points → Simplified Due Diligence (where permitted per AML/CFT Policy).
- MEDIUM RISK: Total weighted score 14–19 points → Standard Due Diligence per AML/CFT Policy.
- HIGH RISK: Total weighted score 20 points or above → Enhanced Due Diligence per AML/CFT Policy.

Override Rules:

- (a) Any single factor rated High (3) with a weight of 2 automatically triggers at minimum Standard CDD, regardless of total score.
- (b) Any customer identified as a PEP (or family member/close associate of a PEP) is automatically rated High Risk regardless of total score.

5. APPLICATION OF RISK RATING

- Risk rating is assigned at customer onboarding, prior to account activation where deposits exceed the EUR 2,000 CDD threshold.
- Ratings are reviewed: annually for High-Risk customers; every two years for Medium-Risk customers; every three years for Low-Risk customers.
- Ratings are reassessed upon trigger events including: significant change in transaction behaviour, adverse media hit, law enforcement or FIU inquiry, or material change in customer circumstances.
- All rating changes and the rationale therefor are documented in the customer file.
- Refer to the AML/CFT Policy for full CDD, EDD, and SDD procedures applicable to each risk level.

6. AUTOMATIC HIGH-RISK TRIGGERS

The following circumstances result in automatic High-Risk classification regardless of the weighted score calculation:

- (c) Customer is a PEP, or a family member or close associate of a PEP.
- (d) Confirmed negative media screening hit relating to financial crime, corruption, or sanctions.
- (e) Law enforcement or FIU inquiry received regarding the customer.
- (f) Customer is the subject of a Suspicious Activity Report (SAR) filed by Losartez B.V.
- (g) Customer attempts to use third-party payment methods without reasonable justification.
- (h) Customer attempts to open or is detected operating multiple accounts.

7. REVIEW AND AMENDMENT

This Customer Risk Rating Matrix is maintained by the Compliance Officer as a confidential operational document. Amendments may be made by the Compliance Officer without Board approval. The Matrix is reviewed at least annually, or more frequently when changes in risk indicators, regulatory requirements, or business operations require.