

Type of risk			Sub Category			Scenario			Risk Rating		
		Geographic, Player, Product, Interface Risk, Transaction Risk				How is the risk likely to take place?			Low, Medium, High, Critical	Controls	
R001		Type of risk	Geographic		Sub Category	IP Address		Scenario	The player's IP address is changing location from time to time	low	We record the IP address for each log in for each active session or session history. Monthly review through report
R002		Type of risk	Geographic		Sub Category	IP Address		Scenario	Several deposit attempts from the same IP have been attempted to be processed in a short timeframe	medium	We record IP address for card payments ((name of payment institution)). [MLRO Officer] receive reports and do control. Defined in [Player management procedure].
R003		Type of risk	Geographic		Sub Category	Jurisdiction		Scenario	If the registration takes place from a FATF high risk jurisdiction or at restricted country (as defined at AML Policy)	low	System message that registration is not allowed from these countries. There is no possibility of verifying players from at-risk countries.
R004		Type of risk	Geographic		Sub Category	Jurisdiction		Scenario	The address listed during the registration phase does not match the utility bill	medium	Additional enhanced verification as defined in AML Policy.
R005		Type of risk	Geographic		Sub Category	Jurisdiction		Scenario	There have been several changes of residential address requested from the same player over a period of time	medium	[30 days is a critical period for changing the address] or [additional enhanced verification]
R006		Type of risk	Geographic		Sub Category	Jurisdiction		Scenario	Utility bill address is in an FATF high risk jurisdiction or at restricted country (as defined at AML Policy)	low	System limitation
R007		Type of risk	Geographic		Sub Category	Jurisdiction		Scenario	The player's location is outside the EU, however approved as an EU equivalent by FATF: e.g. Brazil, Canada, Hong Kong etc.	low	We threat these countries as countries of low risk. There is option to choose these countries through registration.
R008		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	The player changes registered address details following registration	low	Systemically there is a possibility to change the address. [Defined in the Player management procedure]
R009		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	There has been a change of pattern in the deposit and betting activity of the player	high	1) Changes in player behavior are monitored by bookmakers 2) Player tracking software is under development 3) Defined in Player management procedure, monthly review
R010		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	The player's deposit pattern is not in line with the source of wealth	high	Defined in Player management procedure First, we ask each player over 2K cumulative deposits for the origin of the money We include the option of outsourcing engagement
R011		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	The player account becomes inactive without full verification	medium	[Defined in Terms and conditions]
R012		Type of risk	Customer		Sub Category	Politically Exposed Persons		Scenario	The player is a Politically Exposed Person (is marked as a PEP upon verification stage)	high	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
R013		Type of risk	Customer		Sub Category	Politically Exposed Persons		Scenario	The player shifts status from a regular player to a Politically Exposed Person	high	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
R014		Type of risk	Customer		Sub Category	Politically Exposed Persons		Scenario	The player changes status from a Politically Exposed Person to a regular player	high	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
R015		Type of risk	Customer		Sub Category	Financial Sanctions		Scenario	The player is registered on a sanction list	high	According to AML policy. Impossible to register.
R016		Type of risk	Customer		Sub Category	Financial Sanctions		Scenario	The player already registered, eventually is listed on a sanction list	high	According to AML policy. Blocking the player.
R017		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	Player does not co-operate with due diligence checks upon verification	high	According to AML Policy. If documentation not received within 30 days the threshold is reached we will terminate business relationship and report transaction to the FIU if presumption of ML exists.
R018		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	All registered details do not match to documents provided by the player	medium	Additional enhanced verification as defined in AML Policy.
R019		Type of risk	Transaction		Sub Category	Multiple Accounts		Scenario	The player is registering multiple accounts linked to several different credit/debit cards belonging to the same player	high	Player management according to industry best practice, we do not store card information, we rely on a third party anti fraud system
R020		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	Upon verification, the player has been flagged as entering fake details	low	Defined in Terms&Conditions if it is determined on verification that the player has provided false information, it will be rejected

R021		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	The player is flagged as underage upon verification	low	Defined in Terms&Conditions System control disabling registration of the underage persons
R022		Type of risk	Customer		Sub Category	Registration		Scenario	The player registers, deposits, and self-excludes without being fully verified	low	[Defined by the Player management procedure] Daily account control
R023		Type of risk	Customer		Sub Category	Registration		Scenario	The player is not fully verified upon requesting withdrawal of funds	low	Systemic limitation of inability to pay without full verification and no document submitted. [Defined by the Player management procedure]
R024		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player uses more than one payment method to avoid thresholds	medium	[Defined by the Player management procedure]. We check the payment channels on a daily basis
R025		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player requests a change in payment method	low	[Defined in Player management procedure] In accordance with best practice in the gambling industry
R026		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	Player is ranked as a high roller through the system in the back office	low	[Defined by the Player management procedure, control by the bookmakers within the player categorization]
R027		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	A player wasn't a high roller, however suddenly becomes a high roller	low	[Defined by the Player management procedure, control by the bookmakers within the player categorization]
R028		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player registers a duplicate Skrill email	low	Solved by system restriction, payment can only be made to a Skrill account if the player has registered his account with the same email
R029		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player registers a duplicate Neteller Secure ID	N/A	N/A
R030		Type of risk	Product		Sub Category	Bonus Scheme		Scenario	The player is abusing of the bonus system by registering multiple accounts on the same brand	high	[Defined in the Player management procedure], monitoring whether multiple accounts come from the same IP address, manual checking, manual blocking of accounts if bonuses are used
R031		Type of risk	Product		Sub Category	Product Type		Scenario	The nature of the product is high risk	medium	[It is defined in the Player Management procedure that livebet is a high-risk product. The control measure was moved to the third party].
R032		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player utilizes a non-PCI compliance or non EEA regulated payment method as their preferred funding method	low	Payment channels are in line with EU regulations
R033		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player processes a direct transfer from a non reputable bank	N/A	N/A
R034		Type of risk	Transaction		Sub Category	Pre-paid cards and Virtual Currency		Scenario	The player processes a transfer from a prepaid card website	medium	The control measure has been overtaken by third party.
R035		Type of risk	Transaction		Sub Category	Chargebacks		Scenario	The player initiates a chargeback following a deposit processed	medium	Defined in the Player management procedure, if we notice such transactions, the account is blocked. Control is done on a daily basis.
R036		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	The system (or a third party provider) flagged a change in the player's financial deposit and withdrawal pattern	medium	Transactions are monitored within the framework of law enforcement activities to prevent money laundering, defined in Player management procedure
R037		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player uses more than one payment method and requests withdrawal	low	Defined in MGA policy
R038		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	Inconsistency in credit card details compared to the player credentials	medium	There is a manual check on 7 days, defined by the Player management procedure
R039		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player uses more than one payment method and links several credit cards to the different methods	low	The limit is defined according to third party terms
R040		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	The player attempts to process a withdrawal without placing a bet	medium	Defined in Terms&Conditions
R041		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	The player manages to gamble without registration and proper verification	low	Defined in Terms&Conditions
R042		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	The player deposits an amount exceeding 5,000 Naf. after registration	low	Threshold is calculated on a daily basis taking all deposits and withdrawals into account since establishment of business relationship including peer-to-peer transfers. CDD measures as specified in AML policy.
R043		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	The player deposits amounts to avoid thresholds (smurfing)	medium	Daily checks are conducted and internal records are maintained, as defined in the AML policy
R044		Type of risk	Geographic		Sub Category	Jurisdiction		Scenario	The player a resident in an sanctioned jurisdiction registers in the system	low	Solved by system limitation

R045		Type of risk	Geographic		Sub Category	Jurisdiction		Scenario	The player logs in from a sanctioned jurisdiction	low	We are exposed to this risk 1% because of automatic control
R046		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	A customer underage uses a credit/debit card, which belongs to an adult, in order to deposit	low	Solved by system limitation, Terms&Condition
R047		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	An underage person uses a credit/debit card, which belongs to an adult, in order to deposit	medium	In line with best practice in the gaming industry
R048		Type of risk	Transaction		Sub Category	Pre-paid cards and Virtual Currency		Scenario	Player uses virtual currency to fund the account	N/A	N/A
R049		Type of risk	Customer		Sub Category	Registration and Verification		Scenario	The player is not fully verified through the third party software system	low	The control measure has been overtaken by third party Defined in Terms and Conditions of third party
R050		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	Sudden increase on the transaction volume of a player	medium	Manual check, defined in Player management procedure
R051		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	Player deposits more than 2,000 or deposits 2,000 and gambles that amount in 24 hours	medium	Defined in Player management procedure
R052		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	Customer Due Diligence related documentation of a player (f.e. ID card) expires	medium	Defined in T&C and AML, a control measure is planned within the verification process + ongoing monitoring leading to the additional verification
R053		Type of risk	Governance		Sub Category	MLRO		Scenario	The Company has not appointed a designated Money Laundering Reporting Officer or a Nominated Officer	low	[It is defined in accordance with AML regulation]
R054		Type of risk	Governance		Sub Category	Corporate Structure		Scenario	The MLRO can not communicate or does not have direct access to the Company's Board of Directors	low	Defined in internal procedure, AML policy
R055		Type of risk	Governance		Sub Category	Corporate Structure		Scenario	An employee does not have access to the MLRO for reporting purposes	low	Defined in internal procedure, AML policy
R056		Type of risk	Governance		Sub Category	Corporate Structure		Scenario	There is no function of an internal audit or any external business risk assessments	medium	There is risk management department, defined in Risk management policy
R057		Type of risk	Governance		Sub Category	Corporate Structure		Scenario	System and software are not being reviewed on a periodic basis	medium	There is a review during the regular annual audit
R058		Type of risk	Governance		Sub Category	Policies and Procedures		Scenario	AML/CFT Policies and Procedures are not documented	low	AML policy
R059		Type of risk	Governance		Sub Category	Policies and Procedures		Scenario	AML/CFT Policies and Procedures are not commensurate with the Subject's structure, business activities and products.	low	The procedures are in line with all activities in this domain
R060		Type of risk	Governance		Sub Category	Policies and Procedures		Scenario	AML/CFT Policies and Procedures are not approved by the Board of Directors	low	All procedures have been approved by top management
R061		Type of risk	Governance		Sub Category	Corporate Structure		Scenario	AML/CFT Monthly Reports are not being sent to the Board of Directors	low	Monthly reports are submitted to management in accordance with the AML policy
R062		Type of risk	Governance		Sub Category	Corporate Structure		Scenario	A designated employee has not been appointed	low	Defined in AML policy
R063		Type of risk	Governance		Sub Category	MLRO		Scenario	The MLRO/Nominated Officer does not have a proper AML oversight of all the Company's operations	low	Defined in AML policy
R064		Type of risk	Governance		Sub Category	Policies and Procedures		Scenario	There is no Customer Acceptance Policy in place	low	There is Player management procedure
R065		Type of risk	Governance		Sub Category	Policies and Procedures		Scenario	There is no Customer Risk Assessment procedures in place	low	Part of Business risk assessment
R066		Type of risk	Governance		Sub Category	Policies and Procedures		Scenario	There is not Customer Risk Assessment report or file or any information document with the assessment of all the active players included	low	Part of Business risk assessment
R067		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	Player does not co-operate with ongoing due diligence checks (f.e. to a source of funds request)	low	In accordance with Terms&Conditions and/or AML
R068		Type of risk	Customer		Sub Category	Politically Exposed Persons		Scenario	The player is a former Politically Exposed Person (marked as an ex-PEP upon registration)	high	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
R069		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player only uses Alternative Payment Methods as payment methods (other than Credit Card, Debit Card, Trustly)	low	N/A
R070		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	The player attempts to withdraw using a payment method other than the one used to fund the account	medium	N/A
		Type of risk	Transaction		Sub Category	Payment Methods		Scenario	Cryptocurrency and crypto assets (crypto), including digital assets	high	
R071		Type of risk	Geographic		Sub Category	Jurisdiction		Scenario	The player is resident in a high credit card fraud jurisdiction	medium	The control measure has been overtaken by third party.
R072		Type of risk	Customer		Sub Category	On-going Monitoring		Scenario	The player provides a suspicious CDD document (after registration)	low	In accordance with best practice in the gambling industry. Additional enhanced verification

R073	Type of risk	Customer	Sub Category	On-going Monitoring	Scenario	The player deposits 30,000 in total per network/per lifetime	medium	Defined in Player management procedure
R074	Type of risk	Customer	Sub Category	On-going Monitoring	Scenario	The player deposits 25,000 in total per month	medium	Defined in Player management procedure
R075	Type of risk	Customer	Sub Category	On-going Monitoring	Scenario	The player deposits 15,000 in total per week	medium	Defined in Player management procedure
R076	Type of risk	Customer	Sub Category	On-going Monitoring	Scenario	The player deposits 5,000 in total per day	medium	Defined in Player management procedure
R077	Type of risk	Customer	Sub Category	On-going Monitoring	Scenario	Player's losses are bigger than net worth	low	In accordance with best practice in the gambling industry
R078	Type of risk	Customer	Sub Category	On-going Monitoring	Scenario	AML/CFT suspicious transactions by the player	medium	In accordance with best practice in the gambling industry. Monitoring and FIU reporting if required
R079	Type of risk	People	Sub Category	Employee	Scenario	Employee fails the Pre-Employment background check	low	There is control through selection and recruiting process
R080	Type of risk	People	Sub Category	Employee	Scenario	Employee's behaviour is a warning sign of fraud	low	Defined in Fraud policy, reporting to Compliance department
R081	Type of risk	Governance	Sub Category	Training	Scenario	A annual (or after trigger events) AML/CFT training is not being conducted for all employees	low	Basic knowledge of all employees is required, employee with role in process have been on training
R082	Type of risk	Governance	Sub Category	Risk Culture	Scenario	Employees are not aware of the policies and procedures	low	Proceed in accordance with the HR procedure
R083	Type of risk	Governance	Sub Category	Risk Culture	Scenario	The tone at the top is not effective and the board is not aware of any issues arising to the lack of co-operation from staff in terms of the prevention of fraud	low	All procedures are approved by top management, top management is included through regular reports on all activities in this domain
R084	Type of risk	Governance	Sub Category	Risk Culture	Scenario	The tone at the top is not effective and no efforts to embed the risk culture is present due to financial objectives taking over compliance objectives	low	As part of our regular goal, Risk Management department is working to raise risk culture through training, education and involvement in key company processes. Risk committee has been formed.
R085	Type of risk	Customer	Sub Category	Risk Culture	Scenario	Top 50 players have RG interactions	low	Defined in Fraud policy
R086	Type of risk	Customer	Sub Category	Third Parties	Scenario	Finnplay AML & RG Policies and Operations are compliant within each jurisdiction	N/A	N/A
R087	Type of risk	Customer	Sub Category	Third Parties	Scenario	Finnplay Platform spot checks being done for RG Interactions, AML transactions	N/A	N/A
R088	Type of risk	Customer	Sub Category	Third Parties	Scenario	Finnplay technology uptime of websites	N/A	N/A
R089	Type of risk	Tax	Sub Category	Regulation	Scenario	Incorrectly charge or pay tax on gaming revenue	low	Systematic control
R090	Type of risk	Regulation	Sub Category	Licenses	Scenario	Following changes in law and regulation could cause loosing the permissions and licences	low	Dedicated person for monitoring changes and integrated in company process on time, proactive communication with regulatory bodies

Business Risk Assessment covering Curacao					
			Risk Owner	Level of Risk	Controls
Geographic location	Higher financial exposure followed with fraud player activities due to several deposit attempts from the same IP have been attempted to be processed in a short timeframe		[MLRO / Player Support Department / Finance department, etc.]	Medium	We record IP address for card payments ([name of payment institution]); [MLRO Officer] receive reports and do control. Defined in [Player management procedure].
Geographic location	Disabled ongoing monitoring with incorrect customer data due to not matching registration adress and the utility bill			Medium	Defined in Player management procedure
Geographic location	Disabled ongoing monitoring with incorrect customer data due to rapidly changes adress in short period of time			Medium	[30 days is a critical period for changing the address] or [additional enhanced verification]
Player	Disabled ongoing monitoring of the player due to rapidly change of the pattern in the deposit and betting activity of the player			High	1) Changes in player behavior are monitored by bookmakers 2) Player tracking software is under development 3) Defined in Player management procedure, monthly review and monitoring
Player	Disabled ongoing monitoring due to unknown source of deposit			High	Defined in Player management procedure First, we ask each player over 2K cumulative deposits for the origin of the money We include the option of outsourcing engagement
Player	AML risk caused by inactive player without full verification			Medium	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
Player	Disabled ongoing monitoring of PEP in players portfolio			High	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
Player	Disabled ongoing monitoring of players on sanction list			High	According to AML policy. Control once in 15 days + impossible to register if sanction list
Player	Risk of non compliance due to unfinished due dilligence process			High	Due diligence process described in Player management procedure
Player	Disabled ongoing monitoring with incorrect registration and credit card data of player			Medium	Verification is defined in Player management procedure
Player	Higher financial expousure followed with fraud player activities due to multiple player accounts linked to several different credit/debit cards			High	Player management according to industry best practice, we do not store card information, we rely on a third party anti fraud system
Player	AML risk caused by registered player with deposit without verification			High	Defined by the Player management procedure Daily account control
Player	Higher financial exposure followed due to limited player ongoing monitoring caused by rapidly changes in players behaviour			Low	Defined by the Player management procedure, control within the player categorization
Player	AML risk due to player withdrawal without placing a bet			Medium	Defined in Terms&Conditions and/or AML Policy
Player	Disabled ongoing monitoring due to unproprer verification and registration of active player			Low	Defined in Terms&Conditions and/or AML Policy
Player	Disabled ongoing monitoring of the player who deposits an amount exceeding 4,000 Naf. after registration			Low	Threshold is calculated on a daily basis taking all deposits and withdrawals into account since establishment of business relationship including peer-to-peer transfers. CDD measures as specified in AML policy.
Player	Not fulfilled verification for ongoing monitoring of the player due to dependency od third party			Low	The control measure has been overtaken by third party Defined in Terms and Conditions of third party
Player	Disabled ongoing monitoring of the player due to expired documentation			Medium	Defined in T&C, a control measure is planned within the verification process. Ongoing monitoring + additional verification
Player	Risk of unsatisfied player due to loose big than net worth could lead to reputation risk			Low	Loyalty program, In accordance with best practice in the gambling industry Sustainable bussines practice
Player	Higher financial exposure followed due to abusing of the bonus system with registered multiple accounts by same player			High	Defined in the Player management procedure, monitoring whether multiple accounts come from the same IP address, manual checking, manual blocking of accounts if bonuses are used
Transaction	Higher financial expousure followed with fraud player activities due to using more than one payment method by same player			Medium	Defined by the Player management procedure. We check the payment channels on a daily basis
Transaction	Limited control of the high risk in player processes of transferring the money from prepaid card website due to depedency on third party			Medium	The control measure has been overtaken by third party.
Transaction	AML risk due to player request on deposit chargeback			Medium	Defined in the Player management procedure, if we notice such transactions, the account is blocked. Control is done on a daily basis.
Transaction	Disabled ongoing monitoring of the player due to rapidly change of customer behaviour (number of transaction)			Medium	Manual check, defined in Player management procedure
Transaction	Disabled ongoing monitoring of player who deposits a) 30,000 in total per network/per lifetime b) deposits 25,000 in total per month c) deposits 15,000 in total per week d) deposits 5,000 in total per day			Medium	Defined in Player management procedure
Product	Limited control of the high risk in livebet product caused by depedency on third party			Medium	It is defined in the Player Management procedure that livebet is a high-risk product. The control measure was moved to the third party.
Systems & Data	Unavailability of system data due to lack of systematic review			Medium	There is a review during the regular annual audit
People	Risk of unproper detection and reporting of potential fraud behaviour by employee			Low	Defined in Fraud policy, reporting to Compliance department
Corporate & Governance	Non effective action caused by not awared board due to lack of cooperation from staff in terms of fraud prevention			Low	As part of our regular goal, Risk Management department is working to raise risk culture through training, education and involvement in key company processes. Risk committee has been formed.

Business Risk Assessment

Risk Category	Risk Title		Risk Owner	Level of risk	What policy and procedures are in place ?
Player	Disabled ongoing monitoring of the player due to rapidly change of the pattern in the deposit and betting activity of the player			High	1) Changes in player behavior are monitored by bookmakers 2) Player tracking software is under development 3) Defined in Player management procedure, monthly review
Player	Disabled ongoing monitoring due to unknown source of deposit			High	Defined in Player management procedure First, we ask each player over 2K cumulative deposits for the origin of the money We include the option of outsourcing engagement
Player	AML risk caused by inactive player without full verification			Medium	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
Player	Disabled ongoing monitoring of PEP in players portfolio			High	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
Player	Disabled ongoing monitoring of players on sanction list			High	According to AML policy. Control once in 15 days
Player	Risk of non compliance due to unfinished due diligence process			High	Due diligence process through Player management procedure
Player	Disabled ongoing monitoring with incorrect registration and credit card data of player			Medium	Verification is defined in Player management procedure
Player	Higher financial exposure followed with fraud player activities due to multiple player accounts linked to several different credit/debit cards			High	Player management according to industry best practice, we do not store card information, we rely on a third party anti fraud system
Player	AML risk caused by registered player with deposit without verification			High	Defined by the Player management procedure Daily account control
Player	Higher financial exposure followed due to limited player ongoing monitoring caused by rapidly changes in players behaviour			Low	Defined by the Player management procedure, control by the bookmaker within the player categorization
Player	AML risk due to player withdrawal without placing a bet			Medium	Defined in Terms&Conditions
Player	Disabled ongoing monitoring due to improper verification and registration of active player			Low	Defined in Terms&Conditions
Player	Disabled ongoing monitoring of the player who deposits an amount exceeding 5,000 after registration			Low	It is tracked through reports within the Event record, defined by the Player Management procedure Terms & Conditions
Player	Not fulfilled verification for ongoing monitoring of the player due to dependency of third party			Low	The control measure has been overtaken by third party Defined in Terms and Conditions of third party
Player	Disabled ongoing monitoring of the player due to expired documentation			Medium	Defined in T&C, a control measure is planned within the verification process
Player	Risk of unsatisfied player due to loose big than net worth could lead to reputation risk			Low	Loyalty program, In accordance with best practice in the gambling industry Sustainable business practice
Player	Higher financial exposure followed due to abusing of the bonus system with registered multiple accounts by same player			High	Defined in the Player management procedure, monitoring whether multiple accounts come from the same IP address, manual checking, manual blocking of accounts if bonuses are used

Business Risk Assessment					
Risk Category	Risk Title		Risk Owner	Level of risk	What policy and procedures are in place ?
Corporate & Governance	Non effective action caused by not awared board due to lack of cooperation from staff in therms of fraud prevention			Low	As part of our regular goal, Risk Management department is working to raise risk culture through training, education and involvement in key company processes. Risk committee has been formed.

Business Risk Assessment					
Risk Category	Risk Title		Risk Owner	Level of risk	What policy and procedures are in place ?
People	Risk of underproper detection and reporting of potential fraud behaviour by employees			Low	Defined in Fraud policy, reporting to Compliance department

Business Risk Assessment					
Risk Category	Risk Title		Risk Owner	Level of risk	What policy and procedures are in place ?
Product	Limited control of the high risk in livebet product caused by depedency on third party			Medium	It is defined in the Player Management procedure that livebet is a high-risk product. The control measure was moved to the third party.

Business Risk Assessment					
Risk Category	Risk Title		Risk Owner	Level of risk	What policy and procedures are in place ?
Transaction	Higher financial exposure followed with fraud player activities due to using more than one payment method by same player			Medium	Defined by the Player management procedure. We check the payment channels on a daily basis
Transaction	Limited control of the high risk in player processes of transferring the money from prepaid card website due to dependency on third party			Medium	The control measure has been overtaken by third party.
Transaction	AML risk due to player request on deposit chargeback			Medium	Defined in the Player management procedure, if we notice such transactions, the account is blocked. Control is done on a daily basis.
Transaction	Disabled ongoing monitoring of the player due to rapidly change of customer behaviour (number of transaction)			Medium	Manual check, defined in Player management procedure
Transaction	Disabled ongoing monitoring of player who deposits a) 30,000 in total per network/per lifetime b) deposits 25,000 in total per month c) deposits 15,000 in total per week			Medium	Defined in Player management procedure

Business Risk Assessment

Risk Category	Risk Title		Risk Owner	Level of risk	What policy and procedures are in place ?
Systems & Data	Unavailability of system data due to lack of systematic review			Medium	There is a review during the regular annual audit

Business Risk Assessment

Risk Category	Risk Title		Risk Owner	Risk controls / What policy and procedures are in place ?
Information Risk				
Information Security Risk	Denial of service(DDOS) attack on Systems or Services			1. Firewall 2. Filters (External DNS implementation for all domain is in final stage. Proposal to implement DDOS Guard) 3. Service separation HA architecture 4. Continuously work, monitoring and improvement on IS 5. External DDOS devices by providers. Information security policy
Information Security Risk	Unavailability of system due to hackers attack on infrastructure (active- total damage, and passive in overtaking the information with more difficulties to be detected)			1. Web application firewall 2. Regular service update . Twice per year pen testing. Vulnerability test 3.Data recovery , detection of potential threats Information security policy
Information Security Risk	Disruption in IP communication abroad			1. Introduction of backup links and BGP AS numbers in all countries Q2 2020. 2. Modification of routing in case of interruption Optimizing the use of infrastructure resources in Malta Information security policy
Information Security Risk	mbet.com web site unavailability			1. Web cluster expansion 2. Optimisation web dba 3. Additional testing before production patch in case of higher vulnerability 4. Change destination for web requests 5. Message for work in progress on site Information security policy
Information Security Risk	The continuity of work have been interrupted at main upstream provider			1. Back up links and new providers Information security policy

Business Risk Assessment					
Risk Category	Risk Title		Risk Owner	Level of risk	What policy and procedures are in place ?
Player	AML risk caused by inactive player without full verification			Medium	The plan is to introduce a check box for high-risk players and the treatment of this category of players is defined by the AML policy
Player	AML risk caused by registered player with deposit without verification			High	Defined by the Player management procedure Daily account control
Player	AML risk due to player withdrawal without placing a bet			Medium	Defined in Terms&Conditions
Transaction	AML risk due to player request on deposit chargeback			Medium	Defined in the Player management procedure, if we notice such transactions, the account is blocked. Control is done on a daily basis.