

Anti Money Laundering (AML) Policy – Version 1.0

Policy Owners:

Compliance function

The Compliance department oversees the implementation of this policy in accordance with the local AML/CTF rules and regulations pursuant to the guidelines of the Curaçao Gaming Authority and is responsible for collecting all data related to money laundering, collaborating with the Curaçao Financial Intelligence Unit (FIU), and making unusual transaction reports when necessary.

Please note, this document is an extract of the client's internal AML Policy and highlights the provisions that are relevant to players.

1 Introduction

Juicy Gaming B.V. (“The Company”) is committed to embedding compliance in all aspects of its business. The Company adheres to the requirements of the Curacao Gaming License (LOK), as well as to applicable local legislation, regulations and licensing requirements (including NORUT, NOIS and applicable sanctions laws) relating to Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF). The Company operates under direct supervision of the Curaçao Gaming Authority (CGA), while recognizing its obligations to other relevant local authorities such as the Curaçao Financial Intelligence Unit (FIU).

Money Laundering (ML) is the process of creating the appearance that funds obtained from criminal activity, such as drug trafficking or terrorism, originate from a legitimate source. Criminals launder money by disguising the source, changing the form of the funds, or moving them to places where they are less likely to attract attention. Additionally, Terrorism Financing (TF) may not involve the proceeds of criminal conduct but rather an attempt to conceal the origin or intended use of the funds, which will later be used for unlawful purposes. Lastly, Financing of the Proliferation of Weapons of Mass Destruction (PFWMD) may involve the sale, transfer, export, of weapons of Mass destruction, like nuclear weapons and atomic weapons.

1.1 Objectives of Anti-Money Laundering (AML)

The objective of this policy is to:

- Showcase that the company makes every effort to comply with the national and international standards of anti-money laundering/counter- terrorist financing/ counter proliferation (AML/CTF/ CP);
- Make customers aware of the company’s obligation under AML regulations.

1.2 Player responsibilities

This policy applies to all users accessing services through www.Exobet.com (the “Website”).

By opening an account on this website, the player agrees to:

- Provide accurate and up-to-date information;
- Comply with all applicable laws and regulations
- Cooperate with verification and compliance requests.

Any failure to comply with any of the above or any further requirements by the Company may result in a possible restricted access to our service.

2 Know Your Customer (KYC) & Client Due Diligence (CDD)

2.1 KYC – Customer identification and verification

To register for a player account, an applicant must register personally and provide the following information, which can be requested at different moments during the registration process:

- a. First and last name;
- b. Date of birth;
- c. Place of birth;
- d. Nationality;
- e. ID card number
- f. Valid email address
- g. Username and a password.

The username, password and other personal information related to the account must be kept secret and confidential and may not be used by any third party. Only natural persons are accepted as customer.

The verification of the identity entails validating the personal details obtained for identification purposes through the request for reliable and independent source documents, data or information.

This request can be conducted:

- i. anytime during the player onboarding;
- ii. upon a request for withdrawal;
- iii. anytime at the discretion of the Company, and
- iv. in any case before reaching a total transaction amount or incident transaction of XCG 4.000 (EUR 2.000) or the equivalent thereof

The Company applies a risk-based approach to AML compliance. Some accounts may be subject to additional requests for information depending on risk factors such as:

- geographic location;
- transaction behavior; and/or
- payment methods used.

If requested information is not received within 30 days from the moment the mentioned threshold was reached, the Company will proceed to close the account and depending on the circumstances of the case, will determine whether the funds will be blocked or transferred to the same bank account it was deposited from or verified wallet on the same name.

Documents should be preferably in English. Player may be required to provide further information or information in the internationally accepted format, including but not limited to requesting official translation of legal documents with appropriate seals. If the player fails in providing sufficient information, refuses to do so or provides documentation not meeting the criteria (e.g. forged, altered, failing security checks), the Company may immediately proceed to permanently close the player's account without the refund of the deposited amount subject to further investigation.

2.2 Politically Exposed Persons (PEP)

The Company maintains specific procedures regarding Politically Exposed Persons (PEP) and may at its own discretion proceed to freeze the player's account without delay and without prior notice, request further information regarding the identity and source of funds/wealth (e.g. credit report, bank statement showing the initial deposit, further information/ documentation showing source of funds/wealth). Depending on the outcome the application will be rejected or further escalated internally.

3 Ongoing monitoring & unusual Activity

The Company reserves the right to carry out a review of the player's account at any time to confirm the identity, age and/or registration details provided by the account holder, in order to ensure that the customer's use of the services complies with the terms and conditions and all applicable law.

The company takes reasonable steps to prevent activities of money laundering and terrorism financing and constantly monitors all player activities including financial habits and behavior to mitigate industry related risks such as money laundering, terrorism financing and other criminal activities such as fraud or collusion.

The following activities are strictly prohibited on our platform:

- using funds derived from criminal activity;
- providing false or misleading information;
- using the account on behalf of another person;
- attempting to bypass security or verification procedures.

At the detection of any of such irregularities, the Company may resolve to freeze funds on the account, refuse or cancel transactions, terminate bonus offers, cancel winnings, and suspend or closure of a player account with possible reporting to relevant authorities.

4 Deposit & withdrawal

Deposits

A player is only permitted to use its personal information and personal bank account. The information provided on the deposit form must be identical to the pertaining data held by the company.

A player may deposit money in his player account only in order to play on the website and use the services and is not allowed to withdraw without prior wagering activity.

Furthermore, the company will not grant interest on deposits. The company reserves the right to apply certain restrictions to the payment methods in selected countries and/or for certain Players.

Withdrawals

A player can only make a withdrawal request once the initial deposit amount is fully used, and specific bonus terms of a bonus must be satisfied before requesting its withdrawal.

No withdrawal will be processed, and funds cannot be withdrawn from the player's account until:

- i. the required verification checks have been satisfactorily completed;
- ii. payments have been confirmed; and
- iii. the player has complied with any other withdrawal conditions, specific rules and promotional terms relating to the player's use of the website and/or affecting his/her account (for example, any applicable bonus terms), and (iv) wagering activity has been conducted by the payer in a minimum amount to be further determined by the Compliance function.

5 Crypto currency section

Cryptocurrency transactions are only possible if the initial deposit was made with a crypto currency. Following this transaction, all transactions (deposits, wagers and payout) with the Player must be conducted using the same crypto currency as with the first deposit.

The Company will at no time sell/buy/exchange crypto currency with and/or to FIAT currency.

The Company will display the rate of exchange from crypto currencies to FIAT currency on the home page of the website. In no way shall the company make exchanges between any crypto currency and any FIAT currency.

Notification of new payment methods will be made on the homepage of the website and sent by e-mail to the players as they are added.

6 Reporting obligations

In accordance with the applicable legislation, the Company will proceed to report any suspicious activities to relevant regulatory or law enforcement authorities.

The Company is thereby mandatorily prohibited to inform the player(s) or third parties of the reporting of or the intention to report an activity or transaction.

7 Record Keeping

The company ensures that an audit trail is maintained to assist in financial investigations. Records are kept for at least 5 years.

8 Policy updates

This policy may be updated from time to time to reflect changes in regulations or internal procedures. The latest version will always be available on the website.

9 Contact

In case of any questions about this policy, please contact our support team at:

- Support@exobet.com
- www.Exobet.com