



**COMPLIANCE
CARIBBEAN**

EST. 1997

Contract AML/CFT/CFP Services

Our reference: cc/24/3097/bl/190

The undersigned:

1. Compliance Caribbean, a trade name of Forensic Services Caribbean N.V., located in Curaçao, Werfstraat 6, Scharloo, registered in the Trade Register in Curaçao under number 93111;

and

2. Media4 Curaçao N.V. (trade name Media4 Curaçao N.V.), located in Curaçao, Zuikertuintjeweg Z/N (Zuikertuin Tower), registered in the Trade Register in Curaçao under number 164617

Considering that:

- Media4 Curaçao B.V. requires AML/CFT/CFP services to support its operations and given the applicable laws and regulations; and
- Compliance Caribbean offers such support based on 26 years of experience.

The parties agree as follows:

1. Compliance Caribbean will provide the services described in the proposal cc/24/9999/bl/185 version 1.0, dated October 7, 2024, and mutually approved by both parties. This proposal is part of this contract. The benefits and procedures of the services are also described therein.
2. To ensure completeness, in addition to what is mentioned in item 1, the policies required to comply with the GCB, NOIS, and NORUT are detailed in Appendix I and will be completed by Compliance Caribbean.
3. The contract will commence on October 23rd, 2024, and the contract period is (at least) 12 months.
4. A notice period of one month applies if either party wishes to terminate the contract after the minimum contract duration. Without written notification, the contract will automatically be extended by 12 months.
5. The fee may be increased after each contract period with an inflation adjustment of up to 3%.
6. Compliance Caribbean will spend a fixed number of hours per week on 'regular' compliance topics. The times will be determined at the outset and can be adjusted during the contract by mutual agreement.
7. The response time for urgent inquiries/requests outside of the fixed compliance moments, see point 5, is within 8 hours (1 business day).



This contract includes:

- a. The services in accordance with the aforementioned proposal
- b. Mrs. Ana Victoria Ghio Segoviano, is the contact person for Media4 Curaçao B.V. until further notice.
- c. Mrs. Anna Glem is dedicated compliance consultant and Mr. B. van Leeuwen is the contact person for Compliance Caribbean until further notice.
- d. Compliance Caribbean will ensure the engagement of sufficient and qualified staff..
- e. The monthly costs for Media4 Curaçao B.V., regulated by GCB, during the first contract year amount to USD 3,200.00 and will be invoiced monthly in arrears.
- f. During the contract year, an average of 24 hours per month will be spent on this project by a junior consultant and 10 hours by a senior consultant.
- g. If needed and only after your approval additional hours will be charged against \$85 - \$145 per hour.
- h. All mentioned costs are exclusive of 3% office costs and taxes.

Signed, Curaçao, October 23, 2024

Compliance Caribbean

On behalf of:

B. van Leeuwen CAMS CFE

Media4 Curaçao B.V.

On behalf of:

Signed by:

Glenn C. Kellum o.b.o. the Director Downtown E-Com

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Appendix I

Relevant Guidelines from the GCB:

Regulations for the combating of Money Laundering, the Financing of Terrorism and Proliferation of weapons of mass destruction, Applicable for Curaçao casinos and providers of other online games:

The casino shall make the following items readily available for the GCB:

- a. AML Policy Statement,
- b. Its written and approved AML Compliance Program on money laundering, terrorist financing and financing of proliferation including
 - Customer Acceptance Policy
 - Technological Developments Risk Assessment
 - Customer Due Diligence
 - Information from the player
 - Customer Risk Assessment
 - ID verification
 - Sanctions screening and PEP status screening
 - ID and verification of beneficial owners
 - The purpose and nature of the business relationship
 - Dealing with PEPs
 - Reliance on third parties
 - Group company
 - Outsourced/agency
 - Enhanced Due Diligence
 - Simplified Due Diligence
 - Ongoing monitoring of identity
 - Ongoing monitoring of transactions
 - Deterrence, detection, and reporting of unusual transactions
 - Record keeping (due diligence records, transaction records)
 - Independent audit function to test the AML program
 - Examinations by the Gaming Control Board
- c. Records of its Business Risk assessment, covering:
 - Customer risk
 - Geographical risk
 - Product, service, and transaction risk
 - Distribution channels risk
- d. The name of each Compliance Officer responsible for the casino's overall money laundering and terrorist financing policies and procedures and his/her designated job description at the management level ;
- e. Records of reported unusual transactions;
- f. Records of unusual transactions which required closer investigations;
- g. Records of frozen accounts;



- h. Schedule of the training provided to the casino's personnel regarding money laundering, terrorist financing and proliferation of weapons;
- i. The assessment report on the casino's policies and procedures on money laundering, terrorist financing and financing of proliferation by the internal audit department or an external auditor;
- j. The customer's files including customer risk assessment, CDD, customer acceptance and transaction information.

Conditions to Curacao Online Gaming License, Article 16: Policies and procedures:

The licensee shall at all times have policies and procedures in place regarding:

- k. customer identification and verification;
- l. player account and fund management;
- m. responsible gaming;
- n. information security;
- o. AML/ CFT/ CPF; and
- p. player account suspension and closure;
- q. or any other policies and procedures the GCB may demand in the interest of a safe, responsible, transparent, verifiable, and reliable offering of remote games of chance.

