

Audeo N.V. – AML/CFT POLICY

Version 1.1 – Effective 1 November 2025

Next Review Date: 1 November 2026

Approved by: MLRO – Brett Long

Confidential Document

VERSION CONTROL TABLE

Version	Effective Date	Prepared by	Reviewed by	Approved by	Next Review Date
1.1	1 November 2025	Compliance Department	MLRO	MLRO – Brett Long	1 November 2026

1. INTRODUCTION & POLICY STATEMENT

Audeo N.V. (“Audeo” or “the Company”) is committed to the highest standards of integrity and regulatory compliance in all its business operations. This Anti–Money Laundering and Counter–Terrorist Financing (“AML/CFT”) Policy establishes the mandatory framework, internal controls, and procedural standards for identifying, mitigating, and preventing money laundering, terrorist financing, and financial crime across Audeo’s operations.

Audeo adopts a **zero-tolerance** approach toward the misuse of its gaming platform for illicit purposes and is committed to complying with all applicable laws and regulations of Curaçao, including the National Ordinance on the Reporting of Unusual Transactions (NORUT), the National Ordinance on Identification When Rendering Services (NOIS), the National Ordinance on Games of Chance (LOK), CGA AML/CFT Guidelines, FIU Curaçao requirements, and the FATF Recommendations.

This Policy applies to **all business units, employees, officers, outsourced service providers, platform operators, and contractors** who perform functions on behalf of Audeo.

2. PURPOSE OF THIS POLICY

The objectives of this AML/CFT Policy are to:

1. Establish the governance framework and compliance standards required to meet Curaçao's AML/CFT laws and CGA directives.
2. Ensure that Audeo implements risk-based measures to detect, prevent, and report ML/TF activities.
3. Define the responsibilities of the Money Laundering Reporting Officer (“MLRO”).
4. Outline customer due diligence (CDD), enhanced due diligence (EDD), and ongoing monitoring requirements.
5. Protect Audeo, its players, and its stakeholders from being exploited for criminal purposes.
6. Ensure the Company maintains accurate records, provides effective AML training, and cooperates with regulatory authorities.

3. SCOPE AND AUDIENCE

This Policy applies to:

- All directors, officers, and employees of Audeo N.V.;
- The MLRO and Compliance staff;
- RS Reevo Services Limited (platform provider), insofar as it performs KYC/AML processes;
- Any third parties performing services related to player onboarding, verification, transaction monitoring, or financial controls.

4. APPROVING AUTHORITY & RESPONSIBLE OFFICE

- **Approving Authority:** Money Laundering Reporting Officer (“MLRO”)
- **Responsible Office:** Compliance Department
- **MLRO:** Brett Long

The MLRO has ultimate responsibility for ensuring adherence to this Policy.

5. LEGAL AND REGULATORY FRAMEWORK

This Policy is based on and must comply with the following:

- National Ordinance on the Reporting of Unusual Transactions (NORUT)
- National Ordinance on Identification when Rendering Services (NOIS)
- National Ordinance on Games of Chance (LOK – 20 December 2024)
- Curaçao Gaming Authority AML/CFT Guidelines
- FATF Recommendations
- FIU Curaçao reporting obligations
- Applicable international sanctions regimes

Where conflicts arise, the stricter requirement prevails.

6. DEFINITIONS

Customer Due Diligence (CDD): Measures undertaken to identify and verify customers.

Enhanced Due Diligence (EDD): Additional steps required for high-risk customers or transactions.

MLRO: The appointed Money Laundering Reporting Officer responsible for oversight of AML/CFT compliance.

STR: Suspicious Transaction Report filed with FIU Curaçao.

Unusual Transaction: Any transaction meeting objective or subjective indicators published by FIU Curaçao.

PEP: Politically Exposed Person.

Beneficial Owner: Any natural person owning or controlling 10% or more of the customer.

Platform Provider: RS Reevo Services Limited, Cyprus (HE264183).

7. POLICY FRAMEWORK

Below are the core components of Audeo’s AML/CFT Program.

7.1 Governance & Responsibilities

7.1.1 The MLRO

The MLRO (Brett Long) is responsible for:

- Overseeing AML/CFT compliance;
- Reviewing KYC, EDD, and monitoring alerts;

- Filing STRs and responding to FIU Curaçao inquiries;
- Approving onboarding of high-risk customers;
- Maintaining AML policies and training;
- Reporting AML issues to management.

7.1.2 Platform Provider – RS Reevo Services Limited

Audeo utilises the gaming platform operated by **RS Reevo Services Limited**, Cyprus HE264183.

Under contractual agreement, Reevo performs:

- Player KYC
- Document verification
- Sanctions/PEP screening
- Fraud monitoring
- Transaction surveillance
- Player risk scoring

Audeo maintains oversight and audits Reevo's KYC/AML controls.

7.2 Business Risk Assessment

Audeo conducts a documented risk assessment covering:

- **Customer risk**
- **Product risk** (B2C online gaming; no crypto)
- **Jurisdictional risk**
- **Transaction risk**
- **Delivery channel risk** (fully remote)

Updated **annually** or when business changes.

7.3 Customer Risk Assessment

Risk scoring includes:

- Jurisdiction & nationality
- Source of funds indicators
- High-risk behaviour
- PEP/Adverse media exposure
- Transaction patterns

High-risk customers require **EDD** and MLRO approval.

7.4 Customer Acceptance Policy

Audeo will **not** onboard customers who:

- Are under 18
- Are residents of prohibited jurisdictions
- Fail KYC
- Decline to provide documents
- Appear linked to ML/TF risks
- Wish to transact in cryptocurrency

Only **fiat** is accepted.

7.5 Customer Due Diligence (CDD)

CDD includes:

- Identity verification
- Address verification
- Liveness/document checks
- Risk scoring
- Reassessment upon triggering events

7.6 Ongoing Monitoring

Monitoring includes:

- Transaction pattern analysis
- Velocity rule triggers
- Behavioural analytics
- Sanctions/PEP re-screening
- Fraud indicators
- High-risk jurisdiction blocking

Red flags are escalated to the MLRO.

7.7 Suspicious Transaction Reporting (STR)

The MLRO must file STRs with FIU Curaçao for any:

- Objective indicator trigger
- Subjective suspicion
- High-risk activity linked to ML/TF

Records of STRs are confidential.

7.8 AML Program Requirements

Audeo maintains:

- An AML framework
- Annual independent AML review
- Employee training
- EDD procedures
- Sanctions compliance program
- Fraud and responsible gaming integration
- Transaction controls
- Restrictive jurisdiction blocking

8. EMPLOYEE TRAINING

Training covers:

- AML laws & obligations
- FIU reporting

- Red flags
- CDD & EDD procedures
- STR escalation
- Regulatory updates

9. RECORDKEEPING

Audeo retains for **5 years**:

- KYC documents
- Monitoring logs
- STR/UT records
- Transaction data
- Risk assessments
- Training logs

10. NON-COMPLIANCE

Violations may lead to:

- Disciplinary action
- Suspension/termination
- Reporting to CGA or FIU
- Regulatory penalties

11. POLICY REVIEW

Annual review by the MLRO or earlier if required.

MLRO SIGNATURE

I hereby approve this AML/CFT Policy.

Name: Brett Long

Title: MLRO – Audeo N.V.



Signature _____

Date: 15 November 2025

ANNEXES

ANNEX 1 – RISK SCORING MATRIX

1. Customer Risk Factors

- Jurisdiction risk rating
- PEP status
- Adverse media
- Behavioural anomalies
- Source of funds

Scoring Range: Low / Medium / High

2. Product & Service Risk

- Online gaming exposure
- Transaction types
- Withdrawal frequency

3. Delivery Channel Risk

- Non face-to-face onboarding
- Remote payments
- Third-party service integrations

4. Transaction Risk

- Large value
- Rapid deposits/withdrawals
- Unusual behaviour

5. Overall Risk Rating

- Aggregated risk scoring
- MLRO approval required for high-risk

ANNEX 2 – PROHIBITED & HIGH-RISK JURISDICTIONS

Audeo prohibits customers from:

A. FATF Blacklist

(Countries as per latest FATF update)

B. CGA-Prohibited Jurisdictions

- Curaçao
- Netherlands
- USA & Territories
- Sanctioned countries
- High-risk conflict zones

C. Company-Restricted Markets

Afghanistan	Democratic Republic of the Congo	Mauritius	Sudan
Aruba	Eritrea	Myanmar	Turkey
Australia	Germany	Netherlands	United Kingdom
Belgium	Greece	North Korea	United States
Bonaire, Saba & Sint Eustatius	Guinea-Bissau	Serbia	Yemen
Canada	Indonesia	Sint Maarten	
Central African Republic	Iran	Slovakia	
Costa Rica	Iraq	Somalia	
Curaçao	Italy	South Sudan	
Czechia	Libya	Spain	

ANNEX 3 – STR ESCALATION PROCEDURE

1. Detection

Trigger from:

- Monitoring alerts
- Manual review
- Adverse media
- PEP alerts
- Player complaints

2. Internal Review

MLRO examines:

- Transaction logs
- Behaviour
- KYC/EDD files
- Pattern anomalies

3. Decision

- File STR
- Reject (with rationale)
- Request additional info

4. Reporting

STR filed with **FIU Curaçao**

5. Post-Report Measures

- Monitoring escalation
- Account restrictions
- Document retention

ANNEX 4 – RECORD RETENTION SCHEDULE

Retention Period: 5 Years

As per NORUT, NOIS, and FIU Curaçao.

Records Covered

- KYC documentation
- CDD/EDD notes
- Monitoring logs
- STRs & decisions
- Communications
- Audit reports
- Training records
- Payment method data