

Temple Holdings N.V.

Know Your Customer (KYC) Policy

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List of Abbreviations and Terms

DOB	Date of Birth
ID	Identification
KYC	Know Your Customer
MRZ	Machine Readable Zone
POA	Proof of Address

Introduction

Temple Holdings N.V (hereinafter referred to as “The Company”) is committed to maintain the highest standards of customer due diligence in line with expectations of Curaçao Gaming Authority regulations. Customers are required at the point of registration to confirm their full name, date of birth and residential address. When a player reaches accumulative deposits of Naf 4,000 (equals to €2,000), the company is required to request documentation to substantiate the personal data the customer has provided.

This document sets out the Company’s policy and a procedure which is followed to KYC its customers.

Know Your Customer

Know Your Customer (KYC) standards are designed to protect the Temple Holdings N.V. against fraud, corruption, money laundering and terrorist financing. Know Your Customer is a verification check carried out by the company to:

- Identify that the customer is who they say they are;
- Verify that the customer is over 18;
- Combat and reduce fraud;
- Prevent money laundering;
- Confirm that the funds being used are genuinely the customers.

KYC Requests

The company operates an automated system whereby a customer playing on their brand the company flags and sent an automated email when they hit the deposit threshold of Naf 4,000 (equals to €2,000) requesting documentation.

Customer accounts are flagged until documents received and verified. No withdrawals are processed from a customer’s account until the KYC verification is completed.

KYC Documents

To fulfil the company KYC obligations, the customer must submit a valid ID and POA document dated within the previous six (6) months.

What documents do we accept as a Proof of Identity?

- current signed passport
- current photo card driving licence
- national ID card
- government-issued ID document with photo

Later we will see that there are many more, but we only list these as authenticity of some documents may be easier to assess/forged than that of others. For example, government-issued identification documents such as identity cards and passports can be checked against standard official templates.

What documents do we accept as Proof of Address?

- city tax bill
- utility bill (eg: water, heat, fixed line telephone, fixed line internet etc)
 - (note: a mobile bill as it is not tied to an address. A utility is).
- bank statement
- insurance certificate
- correspondence from government authority, department or agency

Later we will see that there are many more, but we only list these as authenticity of some documents may be easier to assess/forged than that of others.

We have received the documents. What next? What is the minimum quality standard?

The minimum quality standard for Proof of Identity

- face match (where applicable),
- must show full name (be careful with derivations, update as necessary),
- date of birth,
- photo,
- all 4 corners have to be visible,
- coloured (not black & white),
- both pages (eg: of passport - so we can see the signature),
- in date,
- signed,
- clearly legible,
- in a language that is understood by us,
- has to be a picture of the original document, no scans.
- screenshots or pictures of screens can be accepted.

The minimum quality standard for Proof of Address

- must show full name (be careful with abbreviations),
- address,
- be no more than 6 months old,
- with account/reference/utility number,
- clearly legible,
- in a language that is understood by company employees,
- has to be a picture of the original document, no scans,
- screenshots or pictures of screens can be accepted. (alternatively, the PDF received by the player is acceptable).

What if players don't have the standard documents?

There are many other documents that can be sent in. We only say these ones as they are the most reliable and least risky. However sometimes, players may genuinely not be able to send in the standard documents. If players insist that they do not have the documents we have listed, please contact the KYC & Fraud team.

Please note this should be a rare occurrence, as alternative documents open up the Company to more risks. These cases will be dealt with on a case-by-case basis in a risk-based manner. It is not a guarantee that we will accept the player's alternative document.

Acceptable forms of ID if player has no standard ID document:

- birth certificate + selfie
- firearms certificate or shotgun licence

Document capture and verification

The company partners with a 3rd party Identification Verification provider to assist in the capture and verification of documents provided by its customers.

Included in the automated KYC email request the company sends are links for the customer to upload or take pictures of the required documentation.

Document authentication

On receipt of the required documentation, the company matching the customer details against those submitted at registration and authenticating the documents supplied.

Where documents are verified, the customer is emailed to confirm, and customer accounts are flagged as the KYC verification has been completed.

Where documents are incomplete, the Company will follow up with customer.

Where documents are found to be falsified or player identified as underage, account(s) are immediately restricted, and details escalated to Senior Management.

Failure to comply

Where the customer fails to submit documents within thirty (30) days of the initial request the relevant team is alerted and will request again. In those cases, the account will be disabled (meaning the deposit, gameplay and withdraw options switched off)

Signatory Page

Signed by:

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Mark Cauchi
Compliance Officer
Date: 29/08/24