

Policy Title: Anti-Money Laundering & Counter-Terrorist Financing (AML/CTF) Policy

Effective Date: 15 June 2025

Next Review Date: 15 June 2026

Approved By: Compliance Officer

Responsible Office: wionbet Compliance Department

Applies To: All wionbet employees, partners, and third-party service providers

1. Policy Statement

wionbet is committed to full compliance with anti-money laundering (AML) and counter-terrorist financing (CTF) obligations under Curaçao regulations. This policy outlines our proactive approach to detecting, preventing, and reporting suspicious activities that may be related to money laundering, terrorism financing, or the financing of proliferation of weapons.

2. Purpose

This policy aims to:

- Ensure that wionbet's operations are not used for illicit financial activities.
 - Implement a risk-based approach to AML/CTF in line with Curaçao laws and CGA directives.
 - Define the responsibilities, processes, and procedures to identify and mitigate ML/TF risks.
 - Comply with the obligations set by the Financial Intelligence Unit (FIU) of Curaçao.
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3. Audience

This policy applies to:

- All wionbet employees
 - Contractors and agents
 - Third-party suppliers and affiliates
 - Any person handling player onboarding, financial transactions, or risk management
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4. Definitions

- ML/TF: Money Laundering and Terrorist Financing
 - PEP: Politically Exposed Person
 - CDD: Customer Due Diligence
 - EDD: Enhanced Due Diligence
 - CRA: Customer Risk Assessment
 - FIU: Financial Intelligence Unit of Curaçao
 - SARS: Suspicious Activity Reports
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5. Policy Implementation

5.1 Business Risk Assessment

wionbet conducts a comprehensive risk assessment to evaluate how its platform, games, and financial services may be misused for ML/TF purposes. This includes evaluating risks by product, delivery channel, transaction volume, and geographic exposure.

5.2 Customer Risk Assessment (CRA)

A risk profile is established for each customer at the start of the business relationship. Criteria include geography, payment methods, PEP status, transaction behavior, and source of funds.

5.3 Customer Acceptance Policy (CAP)

Customers are accepted based on their risk profile. The CAP ensures PEPs and sanctioned individuals are screened and rejected when required. High-risk customers undergo Enhanced Due Diligence (EDD).

5.4 Customer Due Diligence (CDD)

CDD procedures include:

- Identity verification via government-issued ID
- Address and age verification
- PEP and Sanctions screening using automated databases
- Ongoing KYC refresh and validation

In case of confirmed suspicion, customer funds are frozen and the case is reported to FIU.

5.5 Ongoing Monitoring

Customer transactions and behavioral patterns are continuously monitored. Automated tools and manual reviews are employed to flag:

- Unusual deposit/withdrawal patterns
- Large transactions outside profile
- Reversal of winnings
- Third-party payments

5.6 Reliance on Third Parties

When third parties are used (e.g., PSPs), wionbet ensures:

- A contractual agreement is in place
- The third party complies with equivalent AML/CTF standards
- Records and audit trails are retained

5.7 Reporting of Suspicious Activities

Suspicious transactions are reported to Curaçao's FIU via STR (Suspicious Transaction Report). Internal alerts are reviewed by the AML Compliance Officer prior to submission.

5.8 AML Compliance Program

wionbet's AML/CTF framework includes:

- Appointment of a dedicated AML Compliance Officer
 - Mandatory staff training (annual minimum)
 - AML audit trails and record keeping
 - Procedures for blocking accounts upon suspicion
 - Immediate escalation protocols
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6. Compliance and Consequences

Non-compliance may result in:

- Disciplinary action (including termination)
- Legal penalties

- Financial sanctions
 - Regulatory intervention
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7. Related Policies & References

- KYC and Identity Verification Policy
 - CGA AML Guidelines
 - Curaçao LOK Anti-Money Laundering Law
 - EU 5AMLD & FATF Recommendations
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8. Contact Information

Compliance Department

✉ Email: complaint@wionbet.com

9. Policy History

- Version 1.0 – 15 June 2025 – New policy issued in accordance with CGA AML/CTF template.
- No prior versions.