

KYC POLICY

CONFIDENTIALITY STATEMENT

Document Version Control

Version	Date	Security class	Author	Purpose
1.0	05/19/2025	Confidential	Right5 Online NV.	Creation of this document

Table of Contents

List of Abbreviations and Terms	4
Introduction	4
Purpose	4
Scope	4
KYC Procedures	4
KYC Requests	4
KYC Documents	5
<i>What documents do we accept as a Proof of Identity?</i>	<i>5</i>
<i>What documents do we accept as Proof of Address?</i>	<i>5</i>
<i>We have received the documents. What next? What is the minimum quality standard?</i>	<i>5</i>
The minimum quality standard for Proof of Identity	5
The minimum quality standard for Proof of Address	5
<i>What if players don't have the standard documents?</i>	<i>6</i>
Document capture and verification	6
Document authentication	6
Failure to comply	6
Penalties for Non-Compliance	6
Conclusion	6
Board of Directors signature page	6

LIST OF ABBREVIATIONS AND TERMS

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

INTRODUCTION

This Know Your Customer (KYC) Policy outlines the procedures that Right5 Online NV. (hereafter referred to as "the Company") has implemented to ensure compliance with applicable regulations and to prevent fraud, money laundering, and terrorist financing in accordance with the laws of Curacao. The policy is designed to comply with the guidelines set forth by the Curacao Gaming Control Board (GCB) and other relevant regulatory bodies.

PURPOSE

The purpose of this KYC policy is to:

- Establish and verify the identity of our customers.
- Detect and report suspicious activities in line with the GCB's reporting requirements.
- Prevent the use of the Company's platform for illegal purposes, including money laundering and terrorist financing.
- Ensure compliance with local and international laws, including those mandated by the GCB.
- Promote transparency and integrity within the online gaming industry.

SCOPE

This policy applies to all customers, employees, agents, and third-party service providers involved in the operations of Right5 Online NV. The policy covers all aspects of the customer relationship, from account opening to ongoing monitoring and eventual closure of accounts, in compliance with the GCB regulations.

KYC PROCEDURES

- **Identity Verification:** Customers are required to provide a valid government-issued identification document, such as a passport, national ID card, or driver's license. The document must include the customer's full name, date of birth, photograph, and nationality. Verification must comply with the GCB's requirements for authenticity checks.
- **Address Verification:** Customers must provide proof of residential address, such as a recent utility bill, bank statement, or rental agreement, issued within the last six (6) months. Enhanced verification methods as required by the GCB are employed.
- **Age Verification:** Customers must be at least 18 years old to participate in online gaming activities. Age verification is conducted through the provided identification documents and supplemented by digital verification tools approved by the GCB.

KYC REQUESTS

The Company operates a manual system whereby a customer playing on their brand(s), the company flags and send an 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?

- council tax bill
- utility bill (eg: water, heat, fixed line telephone, fixed line internet etc)
 - (not 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 in the UK - 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 the Company have listed, please contact the KYC 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 captures and verifies the documents provided by its customers manually.

Included in the manual KYC email request the players can 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 KYC team 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) and the business relationship terminated.

PENALTIES FOR NON-COMPLIANCE

Internal Disciplinary Actions: Employees or third parties found to be non-compliant with the KYC policy may face disciplinary actions, including termination of employment or contracts.

Regulatory Penalties: The Company acknowledges that non-compliance with KYC regulations can lead to significant fines, sanctions, or the revocation of its gaming license by the Curacao Gaming Control Board.

CONCLUSION

The Company is committed to maintaining the highest standards of compliance with KYC regulations to protect itself, its customers, and the broader financial system. By adhering to this policy, the Company aims to foster a safe and transparent gaming environment, in strict accordance with the GCB's regulations.

Board of Directors signature page

Date: May 2025

