

Know Your Customer (KYC) and Customer Due Diligence Policy (CDD)

KING ENTERPRISES N.V.

Approving Official: Director, King Enterprises N.V.

Responsible Office: Compliance Department– King Enterprises N.V.

Effective Date: May 29, 2025

Next Review Date: May 29, 2026

1. Purpose and Scope

This policy outlines the procedures for Know Your Customer (KYC) and Customer Due Diligence (CDD) applicable to King Enterprises N.V., in compliance with the Curaçao Gaming Authority (CGA) regulations, the National Ordinance on the Reporting of Unusual Transactions (NORUT), and the National Ordinance on the Prevention of Money Laundering and Terrorist Financing (NOPML).

2. Customer Identification Requirements

Customers must provide the following documentation within 48 hours of registration or upon request:

- Valid government-issued photo ID (e.g., passport, national ID).
- Proof of residential address (e.g., utility bill, bank statement, dated within 3 months).
- Proof of ownership of the payment method used.

Documents must be legible, valid, and uploaded securely through the user interface. If submitted via email, the address must match the one registered in the customer profile.

3. Risk-Based Approach

King Enterprises N.V. applies a risk-based approach to assess each customer. Risk levels (low, medium, high) are determined based on factors including geographic location, transaction behavior, occupation, and use of high-risk payment methods. High-risk customers may be subject to Enhanced Due Diligence (EDD).

4. Politically Exposed Persons (PEPs)

Customers identified as Politically Exposed Persons (PEPs), or closely associated with one, will be subject to Enhanced Due Diligence procedures. This includes:

- Approval by senior management or the Compliance Officer.
- Additional verification of sources of funds and wealth.
- Continuous monitoring of account activity.

5. Enhanced Due Diligence (EDD)

EDD is required for:

- PEPs.
- Customers from high-risk jurisdictions.
- Unusual or high-value transactions.

EDD may involve:

- Documented source of funds.
- Employment or income verification.
- Deeper background screening.

6. Ongoing Monitoring

All customer accounts are subject to ongoing monitoring, which includes:

- Detection of transaction patterns inconsistent with customer profile.
- Periodic refresh of KYC documents.
- Automated flagging and manual review of suspicious activity.

7. Third Party Reliance

If third-party KYC providers or payment processors are used, King Enterprises ensures written agreements are in place to:

- Guarantee data access.
- Ensure compliance with Curaçao's legal standards.
- Retain the ultimate responsibility for due diligence.

8. Recordkeeping

All KYC documentation and customer records will be securely stored and maintained for a minimum of five (5) years after the end of the business relationship, in compliance with the NOPML and CGA regulations.

9. Data Protection

All personal and financial information collected through KYC procedures will be handled in accordance with applicable data protection regulations and the platform's privacy policy. Customers will be informed of their rights regarding data access and handling.

10. Non-Compliance

Failure to submit required documentation may result in:

- Account restrictions or closure.
- Withholding of winnings or funds.
- Reporting to relevant authorities in line with regulatory obligations.

11. Contact and Oversight

For any questions or issues regarding this policy, customers may contact:

Compliance Office – King Enterprises N.V.

Email: info@kingenterprisesnv.com

All KYC processes are overseen by the appointed Compliance Officer.

12. Policy Review

This policy will be reviewed annually, or earlier if there are significant regulatory changes. The next scheduled review date is May 29, 2026.