

SparkTech N.V. – Anti-Money Laundering (AML) Policy

SparkTech N.V. operates the online casino and sportsbook platform **tapx2.com** under a valid gaming license issued in Curaçao and regulated by the Curaçao Gaming Authority (CGA). This Anti-Money Laundering (AML) Policy outlines our commitment to preventing money laundering, terrorist financing, and other illicit financial activities in accordance with the Curaçao AML/CFT regulatory framework, including the National Ordinance on Identification when Rendering Services (NOIS), the National Ordinance on the Reporting of Unusual Transactions (NORUT), and the CGA Anti-Money Laundering Policy (January 2025).

1. Policy Statement

SparkTech N.V. is committed to maintaining the highest standards of integrity and transparency in all operations. We implement robust systems, internal controls, and risk-based procedures to prevent our services from being used for money laundering (ML), terrorist financing (TF), or proliferation financing (PF).

2. Objectives

The objectives of this AML Policy are to:

- Ensure compliance with the Curaçao AML/CFT legal framework and CGA regulations.
- Identify, mitigate, and monitor ML/TF risks associated with gaming and betting activities.
- Conduct customer due diligence (CDD) and enhanced due diligence (EDD) where applicable.
- Report unusual transactions to the Financial Intelligence Unit (FIU) Curaçao.
- Maintain records and cooperate with authorities as required by law.

3. Risk-Based Approach

SparkTech N.V. applies a risk-based approach, assessing the likelihood of ML/TF risks across our products, customers, geographies, and delivery channels. Enhanced controls are applied where higher risks are identified.

4. Customer Due Diligence

We verify the identity of every customer and beneficial owner before allowing financial transactions above the threshold set by Curaçao regulations. Politically Exposed Persons (PEPs) and sanctioned individuals are subject to enhanced screening.

5. Reporting Obligations

SparkTech N.V. reports all unusual or suspicious transactions to the FIU Curaçao in line with the NORUT and CGA guidelines. Staff are prohibited from disclosing reporting activities to customers (tipping-off prohibition).

6. Training and Awareness

All employees receive regular AML training to recognize and handle suspicious behavior, ensuring continuous compliance.

7. Commitment to Compliance

This policy demonstrates **SparkTech N.V.**'s commitment to operating responsibly and transparently under Curaçao's AML/CFT framework. We continuously review and update our procedures to remain aligned with CGA directives and FATF standards.