



Wisdom Online Gaming

BUSINESS PLAN WITH S.W.O.T.



Business Plan:

Wisdom Online Gaming

1. Executive Summary:

Wisdom Online Gaming is a cutting-edge virtual gaming platform catering to slot enthusiasts worldwide. Boasting an extensive selection of immersive slot games, innovative features, and exceptional customer service, we aim to redefine the online gambling experience. Our platform prioritizes security, fairness, and responsible gaming, providing players with a safe and enjoyable environment to indulge in their passion for slots.

2. Business Model:

At Wisdom Online Gaming, our business model revolves around delivering unparalleled entertainment value to our players while generating revenue through various streams. We offer a diverse portfolio of slot games, ranging from classic fruit machines to modern video slots, each designed



to captivate and engage players. Revenue is primarily derived from player deposits, in-game purchases, and strategic advertising partnerships. Additionally, we implement a subscription-based membership program to offer exclusive perks and rewards to our most loyal players.

3. UBO Background:

Over the past 16 years, the UBO has gained his experience in the gaming industry and feels confident that Wisdom Online Gaming will bring a positive addition of the services to the industry. His experience working in one of the prestigious casinos in Cyprus - Savoy Hotel & Casino – will support the business in managing the team and spreading the necessary knowledge to support the business.



4. Market Analysis:

The online gambling industry continues to experience exponential growth, driven by factors such as increased internet accessibility, technological advancements, and shifting consumer preferences. Within this landscape, the demand for online slot games remains robust, with players seeking engaging gameplay experiences, enticing bonuses, and the opportunity to win substantial prizes. By leveraging market trends and consumer insights, Wisdom Online Gaming aims to capture a significant share of this lucrative market.



5. Target Markets and Customers:

Our target markets comprises Cyprus and Turkey with customers located in the permitted jurisdictions and aged 18 and above who enjoy playing slot games online. This demographic includes both casual players seeking entertainment and seasoned gamblers looking for high-stakes thrills. We cater to a diverse global audience, with a focus on providing localized content and personalized experiences to meet the unique preferences of players in different regions.

6. Marketing and Advertising Strategy:

Wisdom Online Gaming employs a comprehensive marketing and advertising strategy to attract and retain players. Our approach encompasses a mix of digital marketing channels, including search engine optimization (SEO), social media advertising, email marketing campaigns, and affiliate partnerships. We leverage data analytics and user segmentation to deliver targeted promotions and incentives, maximizing player acquisition and retention.



7. Operations and Infrastructure:

Our platform operates on state-of-the-art technology infrastructure, ensuring seamless gameplay, robust security measures, and reliable transaction processing. We maintain dedicated customer support services, available 24/7, to assist players with any inquiries, technical issues, or concerns they may encounter. Additionally, we continuously invest in platform optimization and software updates to enhance performance and user experience.

8. Financial Planning:

Through prudent financial planning and forecasting, Wisdom Online Gaming aims to achieve sustainable growth and profitability. We conduct regular financial assessments, analyzing revenue streams, operating expenses, and profitability margins to optimize financial performance. Our financial strategy emphasizes cost management, revenue diversification, and capital reinvestment to support long-term business objectives.

9. Growth and Expansion Strategy:

Wisdom Online Gaming's growth strategy encompasses both organic expansion and strategic initiatives to capitalize on emerging opportunities in the online gambling market. We plan to introduce innovative new features, collaborate with leading game developers to launch exclusive titles, and expand our geographical reach into untapped markets. Furthermore, we seek to forge strategic partnerships with complementary businesses, such as online payment processors, gaming content providers, and marketing agencies, to drive growth and enhance our competitive position.

10. Risk Management:

The online gambling industry is subject to various risks and uncertainties, including regulatory changes, cybersecurity threats, market competition, and economic volatility. Wisdom Online Gaming implements robust risk management practices to mitigate these risks effectively. We closely monitor regulatory developments and ensure



compliance with applicable laws and regulations in all jurisdictions where we operate. Additionally, we invest in advanced cybersecurity measures to safeguard player data and protect against cyber threats. Furthermore, we maintain financial resilience through prudent financial management, diversification of revenue streams, and contingency planning to mitigate the impact of economic downturns or adverse market conditions.

11. SWOT Analysis:

Strengths:

Diverse range of slot games catering to different player preferences.

Robust technological infrastructure ensuring secure and seamless gaming experience.

Effective digital marketing strategies driving player acquisition and retention.

Dedicated customer support services available 24/7.

Financially prudent approach ensuring sustainable growth and profitability.



Weaknesses:

Regulatory uncertainties and compliance challenges.

Dependency on internet connectivity for platform accessibility.

High operating costs associated with technology maintenance and marketing efforts.

Vulnerability to cybersecurity threats and data breaches.

Reliance on third-party advertising revenue streams.

Opportunities:

Market expansion into new geographic regions and emerging markets.

Introduction of innovative features and exclusive game titles.

Strategic partnerships with industry stakeholders to enhance market presence.

Growing demand for online gambling services globally.

Leveraging data analytics for personalized player experiences and targeted marketing campaigns.



Wisdom Online Gaming

Threats:

Evolving regulatory landscape and potential changes in gaming legislation.

Intense competition from established and emerging online gambling operators.

Economic downturns impacting consumer discretionary spending. Cybersecurity risks and vulnerabilities in online platforms. Negative public perception and regulatory backlash against online gambling industry.

12. Conclusion:

In conclusion, Wisdom Online Gaming is poised for success in the dynamic and competitive online gambling market. With a compelling business model, strategic vision, and unwavering commitment to excellence, we are well-positioned to capitalize on growth opportunities and deliver exceptional value to our players. As we continue to innovate, expand, and adapt to evolving market trends, we remain dedicated to providing an unparalleled gaming experience that delights and entertains players around the globe.

Appendix A

Financial Forecast

	Year 1	Year 2	Year 3
Total revenue:	<u>€800 000</u>	<u>€920 000</u>	<u>€1.100,000</u>
Total expenses:	<u>€480 000</u>	<u>€550 000</u>	<u>€650 000</u>
Net result:	<u>€320 000</u>	<u>€370 000</u>	<u>€450 000</u>
Total	<u>€120 000</u>	<u>€130.000</u>	<u>€150 000</u>
investments:			
Profit margins (%):	<u>25%</u>	<u>26%</u>	<u>27%</u>

Appendix B

Anti-Money Laundering & Combating Terrorist Policy

1 Overview

All staff of Wisdom Online Gaming are required to read this document as part of their initial induction program. All policies contained within must be adhered to by all staff of Wisdom Online Gaming as well as the staff of any organization that provide outsourced operational services on behalf of Wisdom Online Gaming.

Wisdom Online Gaming will be carrying out regulated activities and whilst it recognizes that the regulatory framework associated with this Anti Money Laundering policy is international in nature, Wisdom Online Gaming will comply with all relevant regulation and legislation in whichever jurisdiction Wisdom Online Gaming operates.

All Anti Money Laundering activity will be undertaken at least to the level required by E.U. legislation, unless whichever local regulatory framework, imposes more stringent requirements, in which case they will be complied with in full.

2 Introduction

Wisdom Online Gaming acknowledges the importance of the fight against money laundering and funding of terrorism, and fully supports both the international and national efforts aimed at deterring such crimes.

Money laundering and terrorist funding have been identified as major threats to the financial services community, and in seeking to manage these risks, Wisdom Online Gaming adheres to the relevant laws, regulations, industry best practice, and strict ethical standards. Wisdom Online Gaming is conscious of the fact that the use of the financial sector for money laundering and terrorist funding undermines the integrity of the entire sector and deters honest operators and investors.

Wisdom Online Gaming's firm commitment to contribute in combating money laundering and terrorist funding is driven by its desire to uphold the integrity of the financial system, to protect its reputation and to safeguard the interests of all its stakeholders.

Wisdom Online Gaming will operate an online payment service that is a regulated activity. Wisdom Online Gaming's business model utilizes and extends the existing international banking structure to provide a safe and secure services. By adhering to the policies described in this document Wisdom Online Gaming will ensure that its business is protected from the threats posed by Money Laundering and terrorist financing.

2.1 Legislative Frame of Reference EU

Legislation that applies includes:

- Money Laundering Regulations (The latest regulation was effective from December 2007)
- Terrorist Act 2000 (amended by the Anti-Terrorist Crime and Security Act 2001)
- The second Electronic Money Directive (2EMD)
- Proceeds of Crime Act 2002 (POCA)
- Proceeds of Crime Act 2002 (Amendment) Regulations 2007
- Serious and Organised Crime and Police Act 2005

- Directive 2015/849 (EU)

2.2 Regulatory Frame of Reference

Since 2002, the local safeguards for the prevention of the misuse by criminals of the local financial services industry have been further reinforced through the setting up of the Financial Intelligence Analysis Unit, which is a Government agency that is responsible, inter alia, for the collection, collation, processing, analysis and dissemination of information with a view to combating money laundering and terrorist funding.

3 Statement of Wisdom Online Gaming Anti-Money Laundering Policy

It is Wisdom Online Gaming's policy that our company and all of our company's employees are committed to complying with all legislation and appropriate guidelines designed to combat money laundering activity and the funding of terrorist or criminal activity in the jurisdictions in which we operate.

At a minimum, we will:

- Have written policies and procedures that are intended to detect and disrupt money laundering and/or terrorist funding;
- Appoint a Money Laundering Reporting Officer who is responsible for overseeing compliance with Anti Money Laundering and CFT legislation, regulations, rules and industry guidance;
- Establish and maintain a risk-based approach towards the assessment and management of money laundering and terrorist funding risks;
- Have identification, verification and "know your customer" procedures, including Enhanced Due Diligence for those customers presenting a higher risk;
- Carry out appropriate Due Diligence with respect to prospective and existing customers;
- Procedures for internal and external reporting in case where there is knowledge, suspicion or reasonable grounds to suspect that the offence of money laundering or funding of terrorism has been, is, or may be, committed;
- The retention of Identification and Transactional Documentation as defined in the local

- legislation for the required statutory period;
- Regular awareness and training sessions for all relevant employees to enable them to understand and fulfil their legal obligations, and to promote the culture and values adopted by the Bank towards Anti Money Laundering and CFT;
 - Prohibiting business with shell banks or banks domiciled in jurisdictions with weak regulatory Anti Money Laundering and CFT controls, and the opening of anonymous accounts and accounts in fictitious names;
 - Block transactions that are identified as involving a person who is subject to sanctions;
 - Maintain Independent periodic reviews of Wisdom Online Gaming's compliance with Anti Money Laundering and CFT procedures.
 - Establish and maintain appropriate, comprehensive and proportionate systems and internal controls to enable the identification, monitoring and management of money laundering risk (taking a risk-based approach)

Risk-based approach:

In dealing with customers and deciding on product offerings Wisdom Online Gaming will adopt a risk-based approach to managing and mitigating the risk of financial crime and money laundering in particular. All Wisdom Online Gaming business is conducted on a non-face-to-face basis and this carries an element of risk in itself. It is also recognised that different types of transactions (including account opening) will attract different levels of risk and that the controls used to mitigate these must be appropriate and proportionate to the risk faced.

The best way of mitigating the above risks is by putting in place effective systems and controls and identify the features that such controls should display.

3.1 Wisdom Online Gaming policy

It is Wisdom Online Gaming's policy to identify, control and mitigate all risks associated with Money Laundering and financial crime that appear in its system(s) by developing and managing a set of internal controls that meet all of the requirements of those described above. This will be achieved

by identifying and assessing the risk associated with Wisdom Online Gaming products, customers and transactions (by e.g. developing Wisdom Online Gaming -specific typologies) and by implementing controls that are appropriate, effective and proportionate to the perceived level of risk. These will be described in greater detail in the Wisdom Online Gaming Anti Money Laundering Procedures document.

3.2 Outsourcing

Wisdom Online Gaming recognises that regulated firms outsourcing services cannot contract out of their regulatory responsibilities and remain responsible for systems and controls in respect of the services that are outsourced.

4 Anti Money Laundering Compliance Individual, Designation & Duties

The Money Laundering Reporting Officer will be responsible for:

- Receiving reports of suspicious activity from any employee in the business
- Considering all reports and evaluating whether there is - or seems to be - any evidence of money laundering or terrorist financing
- Reporting any suspicious activity or transaction to the relevant Agency by completing and submitting a Suspicious Activity Report
- Asking the relevant Agency for a defence to a money laundering offence in relation to the transactions that they've reported, and making sure that no transactions are continued illegal.
- Putting in place and operating anti money laundering controls and procedures
- Carrying out money laundering risk assessments
- Record keeping
- Training staff in preventing money laundering

The Money Laundering Reporting Officer will produce an annual report to the Board of Wisdom Online Gaming and will also provide regular reports on Anti Money Laundering activity at each Board meeting as a standing item.

4.1 Duty Delegation

We will temporarily delegate the nominated officer's responsibilities to someone else if they are absent, due to illness or holiday leave. This doesn't relieve the nominated officer of their overall responsibility, and although Wisdom Online Gaming will ensure that there is a suitable individual who is able to take on the duties of the Money Laundering Reporting Officer for a temporary period, relevant Agency approval will not be sought for this individual.

Should a situation arise where this role has to be delegated for a period equal to or greater than '12 weeks in a consecutive 12-month period' then appropriate authority will be sought.

4.2 Monitoring & Compliance

A Compliance Monitoring Program will be in place with Anti Money Laundering reviews undertaken throughout the course of the year.

5 Customer Identification Program

The 4th Anti-money Laundering Directive had a direct impact on the gambling and financial services sectors, by imposing several requirements on companies' day-to-day operations.

- Virtual currency exchange platforms and wallet providers to be added to the list of obliged entities;
- Lower threshold (from 250 to 150 Euro) and obligatory CDD for anonymously used pre-paid instruments;
- Creation of a Specific List of Enhanced CDD measures towards high-risk countries;
- Changes in PEP definition and monitoring requirements;

- Conducting a comprehensive client database check and remediating existing gaps,
- Rechecking PEPs from your existing database,
- Conducting research on overseas corporate structures to comply with new tax crime prevention rules,
- Using adverse media to check on 'persons of interest' to comply with Bribery and Corruption requirements,
- Conducting forensic Enhanced Due Diligence research to clear high-risk clients.

Wisdom Online Gaming's business relationships are not entered into on a face- to-face basis and as such (and where available and cost effective) we will use electronic data brokers, in-house checks including linking I.P. address to stated country of residence, identifying duplicate accounts, confirming ownership of bank accounts, amongst other items, to provide identity verification. This will be used to support the primary means of identifying customer's identity, which will be based on the provision of documentary evidence of identity.

Wisdom Online Gaming will allow users to open regular accounts without having undergone enhanced due diligence in accordance with the AML Regulations. Such accounts will be subject to the imposition of transaction limits that ensure that the account is operated within the financial limits enforced by the Regulations. 'Regular' account holders will be encouraged to upgrade their account and to satisfy all KYC requirements associated with an upgrade. It is Wisdom Online Gaming's policy to undertake enhanced due diligence on all other customers.

5.1 Pathway for Customer

The measures taken by Wisdom Online Gaming to manage the risks associate with AML will address both compliance with legal and regulatory requirements and the need for counter-measures to act as both a visible deterrent and an effective means for collecting intelligence surrounding

attempted money laundering activities.

Wisdom Online Gaming will potentially provide services to businesses, and these customers can set up accounts under which Wisdom Online Gaming's products can be used.

Business customers will be required to provide details dependent on their:

- Type of business,
- Expected volume of transactions,
- Beneficial owners and directors,
- Details of directors and beneficial owners will be verified in line with the requirements of an individual.
- Customers will be verified using a combination of electronic and manual checks, and a 'pass' will enable the use of the e-money product. KYC failures will require further information to be provided, or result in a decline of service.

It is Wisdom Online Gaming's policy to ensure that it has verified the identity of both members and merchants.

5.2 Members

All members, their collaborators and close business partners will be verified to a consistent level and in some instances, where the risk associated with (e.g. the country in which the company is incorporated, country of origin for individuals) is perceived to be high, further verification will also be required.

5.3 Merchants

Wisdom Online Gamings will never establish a business relationship with a Merchant until all relevant parties to the relationship and the ultimate beneficial owner have been identified and the nature of the business they expect to conduct has been established. For every merchant wishing to use Wisdom Online Gaming services a set of 'basic information' will be collected, for those who are perceived to

carry a higher risk more detailed information will be required.

5.4 Identity Documents & Requirements

Private Individuals/sole traders

The following information will be gathered:

- Full name
- Residential address (if different to the business address)
- Date of Birth
- Business trading name
- Business address
- Purpose and nature of the business relationship

The customer's identity will be verified by production of a copy of one of the following, valid, government issued documents:

- Passport
- Driving license including photograph
- National ID card

Proof of the residential address will be verified by production of one of the following:

- Driving license including photograph (if not used above)
- Bank statement (dated within the last 3 months)
- Utility bill (dated within the last 3 months)

In the event that the customer requests correspondence and/or products to be delivered to a business address then proof of the business address will be verified, in addition, by production of a copy of either a valid bank statement relating to the business account or a utility bill dated within the last 3 months

The following information will be gathered in addition to the above:

- Full name of individual applying
- Business address
- Name of all partners or principals (identifying those who exercise control over the management of the partnership)

- Name of individuals who own or control more than 25% of its capital or profit, or voting rights.
- Business trading name (if different)
- Purpose and nature of the business relationship

The customer's identity will be verified by production of a copy of one of the following, valid, documents:

- Partnership Deed
- Membership of a relevant professional or trade association And:
- Verify the identity of at least 2 partners or principals (as per the requirements set out above for 'Individuals')
- Where a formal partnership agreement exists, a mandate from the partnership authorising the opening of an account and conferring authority on those who will operate it should be obtained.

And:

- Verify the identity of all individuals who own or control more than 25% of its capital or profit, or voting rights
- The business address will be verified, in addition, by production of a copy of either a valid bank statement relating to the business account or a utility bill dated within the last 3 months.

Private Companies

The following information will be gathered in addition to the above:

- Full name of company
- Registered number
- Registered office address in country of incorporation
- Business address (if different from registered address)
- Names of all directors (identifying those who exercise control over the management of the company)
- Names of all beneficial owners who own or control more than 25% of its shares or voting rights
- Business trading name (if different)
- Purpose and nature of the business relationship

The customer's identity will be verified by production of a copy of one of the following, valid, documents:

- Certificate of Incorporation (certified copy)

- Memorandum and Articles of Association
- Shareholder register
- Audited accounts (most recent)

And:

- Verify the identity of at least 2 directors, including 1 controlling director (as per the requirements set out above for ‘Individuals’)
- Verify the identity of all beneficial owners and / or shareholders (as per the relevant ownership type)

Public Sector Bodies, Government, State-owned Companies and Super nationals

The following information will be gathered in addition to the above:

- Full name of the entity
- Nature and legal status of the entity
- Registered office address
- Name of home state authority
- Business address (if different from registered address)
- Names of all directors (identifying those who exercise control over the management of the entity)
- Purpose and nature of the business relationship

Steps will be taken to understand the ownership of the entity and its relationship with the home state authority and further documentation will be obtained:

- Audited accounts (most recent)

And:

- Verify the identity of at least 2 directors, including 1 controlling director (as per the requirements set out above for ‘Individuals’)

Trusts and Foundations

The following information will be gathered in addition to the above:

- Full name of the trust
- Country of establishment
- Name of all trustees
- Names of any individual who benefits from more than 25% of the property of the entity or arrangement
- Purpose and nature of the business relationship

The customer’s identity will be verified by production of a copy of one of the following, valid, documents:

- Trust Deed
- Audited accounts (most recent)

And:

- Verify the identity of all trustees (as per the requirements set out above for 'Individuals')
- Verify the identity of any individual who benefits from more than 25% of the property of the entity or arrangement

6 Monitoring Accounts for Suspicious Activity

The system of monitoring that will be implemented relies on both automated monitoring and where appropriate, manual monitoring of transactions by the staff of Wisdom Online Gaming and any outsourced service provider.

Automated monitoring will consist of a series of rules being designated as identifying activity that may fit the profile of a suspicious transaction. Such activity may comprise of:

- An attempt to open duplicate accounts
- An abnormal size or frequency of particular transaction types
- The geographic destination or origin of a payment

Once a transaction has been identified as being suspicious the system may:

- Approve the transaction
- Approve the transaction and generate an exception report which must be referred to the security team for further investigation
- Decline the transaction

6.1 Non-Automated Monitoring

If manual monitoring of transactions is deemed to be more effective, staff will be provided with a set of procedures to enable them to detect any suspicious activity by considering

the value, volume and nature of these transactions.

7 Suspicious Transactions & Reporting

Wisdom Online Gaming will implement a regulatory and legally compliant suspicious activity reporting process and procedure that will enable all staff (employed by Wisdom Online Gaming and by any outsourced service providers working on behalf of Wisdom Online Gaming) to make a report to the Money Laundering Reporting Officer where they know or they suspect or they have reasonable grounds for knowing or suspecting that a person is engaged in money laundering or terrorist financing.

There will be 3 stages to this process:

- Internal reporting
- Money Laundering Reporting Officer evaluation and record keeping
- External reporting

7.1 - Three Stage Process Explained Stage

1 - Internal Reporting

Any employee who suspects money laundering activity should report their suspicions promptly to the Money Laundering Reporting Officer.

No further enquiries should be made about the suspected money laundering after reporting to the Money Laundering Reporting Officer for action. No further steps in any transaction relating to the suspected money laundering should be made without authorisation from the Money Laundering Reporting Officer.

No disclosure should be made to others that would indicate suspicions of money laundering. Any officer reporting should

not discuss the matter with others or note on file that a report has been made to the Money Laundering Reporting Officer as this may result in the suspect becoming aware of the situation.

Any member of staff who fails to comply with this policy may be subject to internal disciplinary action and could also face prosecution. There is no financial threshold below which the obligation to recognise and report suspicion does not apply.

Stage 2 - Money Laundering Reporting Officer Acknowledgement & Evaluation

Whenever a member of staff submits a SAR to the Money Laundering Reporting Officer they will receive a form of tangible receipt evidencing that they have fulfilled their statutory reporting obligation. The Money Laundering Reporting Officer will acknowledge every report made and will then conduct their own evaluation of the information provided within the report and decide whether or not to make a disclosure to the national reporting agency. A record will be maintained of the Money Laundering Reporting Officer's review, evaluation and decision.

Stage 3 - External Reporting

Where a SAR has been made by a member of staff the Money Laundering Reporting Officer, or his authorised delegate, will consider this report and conduct such investigations as they deem relevant or necessary. The final decision as to whether to make a disclosure will rest with the Money Laundering Reporting Officer or his authorised delegate. Where it is appropriate, the Money Laundering Reporting Officer shall make a report to the national reporting agency.

Wisdom Online Gaming will provide the necessary training, procedures and material to make staff aware of their obligations and to enable them to comply. However, all members of staff have a personal responsibility to ensure that they are aware of this policy and the accompanying procedures and that they comply with these. The training provided to staff of outsourced service providers will be the same as that provided to Wisdom Online Gaming staff.

8 Employee Training

Wisdom Online Gaming will make it of utmost importance that all staff (outsourced or otherwise) receive adequate training. In particular, all staff will receive training that will make them aware of:

- Wisdom Online Gaming's responsibilities under all relevant money laundering regulations and legislation, including Client Identification and Suspicious Activity Reporting requirements,
- The potential personal criminal liability of all employees for any offence associated with money laundering legislation,
- The identity and responsibilities of the Money Laundering Reporting Officer,
- The potential effect on the firm, its employees and clients of any breach of money laundering legislation or regulations.

All staff will receive training within one month of full time employment at Wisdom Online Gaming, which will take the form of a presentation. Priority will be given to those staff responsible for handling, or managing the handling, of transactions. The awareness presentation and all ML documentation will be made available to all staff throughout their period of employment with Wisdom Online Gaming.

All relevant staff are required to attain accreditation in respect of Money Laundering training. This will be achieved by the successful completion of a written examination at the end

of the training program. The Money Laundering Reporting Officer will receive external training and will be required to undertake this at least every 12 months.

8.1 Outsourced Services

All employees of outsourced service providers, shall be made aware of the Wisdom Online Gaming Anti Money Laundering policies and procedures and shall receive the same training as regular Wisdom Online Gaming staff, however, unlike Wisdom Online Gaming staff, their training will be conducted within the first 3 months of taking up full time employment.

9 Repercussions for Non-Compliance

Any employee found to be in non-compliance with any requirement of this Policy may face criminal or regulatory proceedings and/or may result in disciplinary action being taken.

Senior management will consider the use of disciplinary action for failure to comply with this Policy if circumstances show negligence or deliberate non-compliance.

10 Anti Money Laundering Record Keeping

Wisdom Online Gaming is aware of and will act in compliance with its duty to take reasonable care to make and keep adequate and appropriate records and will in particular:

- Retain records concerning customer identification and transactions for use as evidence into any money laundering investigation for a period of 5 years from the end of the customer relationship.

- Retain records where a Money Laundering Reporting Officer has considered information or made an investigation into a suspicious activity but has not made a report to a National reporting Agency for a period of 5 years from the date on which the record was made or, where they are the subject of a continuing investigation, until they are no longer required.
- Retain records relating to Money Laundering compliance monitoring and training will be retained for a period of 5 years from when the record was made.
- Retain all reports provided by the Money Laundering Reporting Officer and any records of consideration of those reports (e.g. minutes of board meetings) or of actions taken as a result of those reports (e.g. changes to procedures etc.) for a period of 5 years from the date on which they were made.

10.1 Confidentiality

The original copies of all documentation associated with a report will be stored together. All reports and associated documentation will be stored securely and will remain confidential during the entire retention period.

11 Annual Review of Anti Money Laundering Policy Document

Once every 12 months, Wisdom Online Gaming will undertake to review this document as a part of its Compliance Monitoring Program. Should during that period any regulatory changes (that may affect the policies contained within), be brought to light, changes will be immediately forthcoming.