



Business Risk Assessment (BRA) – Initial Assessment

1. Company Information

- **Registered Name:** Halfsquare B.V.
- **Entity Type:** Limited liability
- **Registration Number:** 166999
- **Country of Incorporation:** Curaçao
- **Date of Incorporation:** April 23, 2024
- **Registered Address:** Livestrong Building, Groot Kwartierweg 10, Curaçao
- **Contact:** compliance@halfsquaregames.com | +599 97471401
- **VAT/Tax ID:** 102698363
- **Website:** www.halfsquaregames.com
- **Business Activities:** Supplier of casino-style software (slot games)

2. Methodology

- **Risk Categories:** Customer, Geographic, Product/Service, Delivery Channel
- **Assessment Criteria:** Likelihood and impact scored on a 1–5 scale; combined score determines Low (1–6), Medium (7–15), High (16–25).
- **Data Sources:** Corporate KYC, external watchlists, regulatory guidance, management input.

3. Risk Identification and Ratings

Risk Category	Identified Risk	Rating	Justification
Clients – operators and service providers	Ability of counterparties to conceal assets under Curaçao corporate structures	High	Curaçao permits the formation of corporate and trust vehicles with limited transparency, making it easier for clients to hide assets offshore. Moreover, Curaçao’s judicial and administrative processes are relatively slow, and mutual legal assistance requests (MLATs) often face significant delays, which hinders enforcement and recovery of funds.
Geographic Risk	Operations and counterparties primarily in Curaçao	Low	Curaçao is medium-risk but within local oversight and CGA transitional regime.
Product Risk	Provision of casino slot games	Medium	Gaming software can be targeted for laundering via win/loss cycles.



Risk Category	Identified Risk	Rating	Justification
Delivery Channel	Online platform with remote onboarding	High	Remote KYC introduces higher fraud/identity risk.

4. Risk Justification

- **Clients – operators and service providers (High):**
 - **Corporate opacity:** Curaçao’s legal framework allows the establishment of companies and trusts that shield ultimate beneficial owners, facilitating cross-border asset concealment.
 - **Enforcement challenges:** The local court system and Financial Intelligence Unit have limited resources and lengthy procedural timelines. Requests for mutual legal assistance—crucial for cross-border investigations—can be delayed by formalities and lack of direct communication channels, reducing the effectiveness of sanctions and asset recovery
 - **Impact:** Heightened money-laundering risk due to difficulty in tracing and seizing illicit proceeds, and potential reputational damage if enforcement actions against counterparties are protracted or unsuccessful.
- **Geographic Risk (Low):** Activities regulated locally, with transitional arrangements under CGA.
- **Product Risk (Medium):** Gaming products inherently attract laundering attempts.
- **Delivery Channel (High):** Remote onboarding and digital transactions increase fraud vulnerabilities.

5. Mitigation Measures

- **Customer:** Enhanced due diligence on UBO; quarterly reviews of director/ shareholder changes.
- **Geographic:** Maintain up-to-date local regulatory liaison; leverage local counsel insights.
- **Product:** Implement transaction-monitoring filters tuned for gaming patterns; set thresholds.
- **Delivery Channel:** Strengthen KYC (ID verification, remote biometric checks); periodic re-verification.
- **Annular corporate & contract audits:** Identifiing unusual invoicing patterns and untimely payments or no payments at all.

6. Residual Risk

- **Customer:** Medium



- **Geographic:** Low
- **Product:** Medium
- **Delivery Channel:** Medium

7. Next Steps

1. Finalize automated monitoring rule definitions.
2. Train staff on new remote KYC tools.
3. Schedule first periodic assessment (see below).