

AML/CTF Policy

Key Information

Approving Official(s): Director

Responsible Office: AE Group B.V.

Effective Date: 01.12.2025

Next Review Date: Annually, or earlier if required by regulatory changes or needs.

1. Policy Statement

AE Group B.V. is committed to preventing money laundering (ML), terrorist financing (TF), and proliferation financing in line with Curacao laws, the National Ordinance on Identification when Rendering Services (NOIS), the National Ordinance on the Reporting of Unusual Transactions (NORUT), the Curacao Gaming Authority (CGA) AML/CFT Regulations, and the FATF Recommendations. The Company applies a risk-based approach to ensure that its services are not misused for criminal purposes and maintains a low-risk appetite for ML/TF. This Policy applies to all business lines, products, and services of AE Group B.V. Ultimate responsibility for AML/CFT compliance rests with the Board of Directors.

2. Purpose

The purpose of this Policy is to establish effective measures to detect and prevent money laundering, terrorist financing, and proliferation financing. It ensures compliance with all applicable legal and regulatory obligations in Curacao and internationally recognized standards. The Policy also defines the procedures and responsibilities of employees and management in safeguarding the integrity of AE Group B.V.'s operations.

3. Audience

This Policy applies to all directors, officers, employees, contractors, agents, and business partners of AE Group B.V.

4. Definitions

For the purpose of this Policy, the following key terms apply:

- **AMLCO** – Anti-Money Laundering Compliance Officer.
- **CDD** – Customer Due Diligence.

- **EDD** – Enhanced Due Diligence.
- **PEP** – Politically Exposed Person.
- **STR/SAR** – Suspicious Transaction Report / Suspicious Activity Report.
- **UBO** – Ultimate Beneficial Owner.

5. Policy implementation

5.1 Business Risk Assessment (BRA)

AE Group B.V. conducts a Business Risk Assessment at least once a year and whenever there are material changes to its operations. The assessment covers products, services, delivery channels, jurisdictions, and customer types, and identifies both inherent and residual risks. It also considers technological developments, including new products, business practices, or delivery mechanisms, with risks assessed before launch. The Company applies a low-risk appetite and does not knowingly accept high-risk customers without Enhanced Due Diligence and approval from senior management.

5.2 Customer Risk Assessment (CRA)

AE Group B.V. assesses the risk level of each customer at onboarding and throughout the business relationship. Customers are classified as low, medium, or high risk based on factors such as geographic location, use of non-face-to-face channels, use of crypto-assets or other anonymous instruments, and PEP status. High-risk customers are subject to Enhanced Due Diligence and closer monitoring. All customer risk assessments are documented and periodically reviewed to ensure accuracy.

5.3 Customer Acceptance Policy (CAP)

AE Group B.V. will not establish or maintain a business relationship without completing full Customer Due Diligence. Customers appearing on sanctions lists are rejected. Politically Exposed Persons (PEP) may only be accepted with prior approval from senior management and subject to Enhanced Due Diligence. If the source of funds or source of wealth cannot be reliably established, the relationship will not be initiated or will be terminated.

5.4 Customer Due Diligence (CDD)

Customer Due Diligence is required at onboarding and when transactions reach or exceed NAF 4,000 ($\approx$ EUR 2,000). The minimum information collected includes full name, date of birth, nationality, valid identification document, and proof of residential address not older than six months. For legal entities, Ultimate Beneficial Owners holding 25% or more ownership or control must be identified and verified. Enhanced Due Diligence is applied to high-risk customers, including PEPs, customers from high-risk jurisdictions, and unusual or complex transactions. This includes verification of the source of funds and source of wealth. Ongoing monitoring ensures that customer activity remains consistent with the known risk profile. All CDD records are securely retained for at least 10 years after the end of the business relationship.

5.5 Ongoing Monitoring

AE Group B.V. continuously monitors customer activity to ensure it is consistent with the established risk profile. Monitoring includes automated and manual reviews of transactions, as well as ongoing screening against international sanctions and PEP lists (UN, EU, OFAC). High-risk customers are subject to enhanced scrutiny, and accounts may be restricted or frozen when required by law or regulatory directives.

5.6 Reliance on third parties to perform customer due diligence

AE Group B.V. may rely on regulated financial institutions to perform elements of Customer Due Diligence. Such reliance is only permitted where the third party is subject to equivalent AML/CFT standards and supervision. The Company remains fully responsible for compliance and ensures that required identification data and documentation can be obtained without delay upon request.

5.7 Reporting of Unusual Transactions

AE Group B.V. identifies and reports unusual or suspicious transactions in line with Curacao regulations. All transactions equal to or above NAF 5,000 ($\approx$ EUR 2,500), or any transaction deemed unusual regardless of value, are reported to the Financial Intelligence Unit (FIU) via the „goAML“ system without delay. Employees must escalate concerns to the AML Compliance Officer, who is responsible for filing Suspicious Transaction Reports (STRs). Suspicious activities involving employees must be reported

confidentially to the AMLCO. Retaliation against employees making such reports is strictly prohibited.

5.8 Anti-Money Laundering Compliance program

AE Group B.V. maintains a comprehensive AML/CFT program based on the three lines of defense: operations, compliance, and internal audit. An AML Compliance Officer (AMLCO) is appointed with direct reporting access to the Board of Directors. Independent audits are conducted annually by an external Curacao accounting firm to certify compliance. All employees receive AML/CFT training at onboarding and annual refreshers, with attendance and results documented. Disciplinary measures, up to and including termination, apply in cases of non-compliance. All AML records, including training logs, transaction data, and Suspicious Transaction reports (STRs), are retained securely for at least 10 years and made available to regulators upon request.

6. Compliance and Consequences of Non-Compliance

AE Group B.V. ensures compliance with all applicable AML/CFT laws and regulations through clear governance, oversight, and accountability. The AML Compliance Officer (AMLCO) has direct access to the Board of Directors and is responsible for monitoring adherence to this Policy. Periodic internal reviews and annual independent audits verify the effectiveness of the AML/CFT program. Any material breaches or non-compliance are promptly escalated and, where required, reported to the relevant regulatory authorities.

7. Related Information

This Policy should be read in conjunction with the following laws and regulations:

- National Ordinance on Identification when Rendering Services (NOIS)
- National Ordinance on the Reporting of Unusual Transactions (NORUT)
- Curacao Gaming Authority (CGA) AML/CFT Regulations issued 2025
- FATF Recommendations

8. Contact Information

For any questions or concerns regarding this Policy, please contact:
AML Compliance Officer (AMLCO)

Address: AE Group B.V., Willemstad, Curacao.

Email: support@efbet.net

9. Policy History

Version 1.0 - (date) - Adopted under CGA AML/CFT Requirements issued 2025.
This Policy is reviewed annually or earlier if required by regulatory changes or business needs.

10. Policy URL

This Policy is published on the Company's official website: www.efbet.net

AE GROUP B.V.

Mitko Todorov:

