

Technology Risk Assessment Process

Alisium B.V. (Reg. number 161507)

Version Control

Name	Description
Document Name	Technology Risk Assessment Process
Version	1.0
Owner/Responsible department	Compliance Department
Authorised By	Board of Directors
Latest Distribution and Effective Date	12.12.2025
Next Review Date	20.12.2026

Version	Description	Date	Initials
1.0	Implementation	20.03.2025	
1.1	Policy Review	12.12.2025	

1. Introduction

This document sets out the obligations of Alisium B.V. (the “Company”) with regard to maintaining appropriate procedures and controls for the preventing the misuse of technology for the purpose of Money Laundering (“ML”), Proliferation Financing (“PF”) or Terrorist Financing (“TF”) in accordance with Section II.3 of the Curacao Gaming Authority (“CGA”) Regulations for the combating of Money Laundering, the Financing of Terrorism and Proliferation of weapons of mass destruction. This Policy shall set out procedures which are to be followed when technology is being considered for introduction by the Company. The procedures set out herein must be followed by the Company and all its employees working on behalf of the Company. Although this is a separate Policy with respect to technology, the overall risk profile of the Company as identified in the AML/CFT/CPF Business Risk Assessment (“BRA”) should additionally be referred to and considered.

2. Initiation of Procedure

The Company shall formally undertake and document TRAs in order to estimate the risk of ML/FT/PF posed to the Company’s business by technology. TRAs will assist the Company in identifying, understanding and addressing the risks posed.

Where the Directors or the employees of the Company are considering the implementation of technology, the Compliance Officer must be informed accordingly and the Compliance Officer shall complete the Technology Risk Assessment (“TRA”) Form. This form must be completed prior to implementation of the proposed development. The Company is obliged to undertake a technology risk assessment that estimates the risk of ML/PF/FT posed by ANY technology to the Company’s business.

The TRA must be undertaken, when -

- A new product is developed;
- A new business practice emerges;
- A new delivery mechanism becomes available;
- A new or developing technology is used for both new and pre-existing products.

The TRA must be:

- Recorded in order to demonstrate its basis;
- Regularly reviewed and, if appropriate, amended so as to keep it up to date.

3. Criteria for Triggering Procedure

The Technology Risk Assessment must have regard to all relevant risk factors including –

- a) Technology used by the Company to comply with AML/CPF/CFT legislation;
- b) The business risk assessment carried out by the Company;
- c) The products and services provided by Company
- d) The manner in which the products and services are provided by the Company with consideration given to delivery methods, communication channels and payment mechanisms;
- e) Digital information and document storage;
- f) Electronic verification of document;
- g) Data and transaction screening systems.

The criteria are not exhaustive and upon decision of the Compliance Officer TRA form may be completed in other cases and considering other relevant criteria.

4. Technology Risk Assessment Form

The template of the TRA can be found as an attachment to this Policy “Technology Risk Assessment Template” and should be completed each time a new technology is identified for the Company. The completed TRA should be contained in a separate file. Identified Technology risks shall be integrated in the Company’s Business Risk assessment.