

Omega Sports Solutions N.V

Risk and Compliance Management Program

Policy Document	Risk and Compliance Management Program
Category	Company Process Document
Scope	Procedure relevant to Omega Sports Solutions N.V
Purpose	To outline the company policy in regards to Risk and Compliance Management Program
Version	1.1

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Purpose

The purpose of this document is to set out the principles and intent of Omega Sports Solutions N.V(hereafter referred to as 'Omega') to enable the Compliance team to operate using the Risk Framework set by the compliance team relevant to (Registrations, Deposits and Withdrawals of customers with HAIKU Holdings in accordance with applicable legislation and the Anti-Money Laundering Regulations.

Scope

Brands: This policy applies to FUN88 operated by Omega

Departments: This policy applies to Customer Service, Risk, Payments, AML, and Compliance

Applicable Regulations

The country AML/CFT regulations reference "AN ACT DESIGNATING CASINOS AS COVERED PERSONS UNDER REPUBLIC ACT NO. 9160, OTHERWISE KNOWN AS THE ANTI-MONEY LAUNDERING ACT OF 2001, AS AMENDED". The Act maybe solicited at this link "<http://www.amlc.gov.ph/images/PDFs/CIRR.pdf> "

The Risk and the Compliance Management Program

The Risk program is set on the basis of customers identified as standard risk customers and customers identified as higher risk customers, the following criteria shall identify such customers and what are the associated actions by the Compliance team for those customers.

Standard Risk:

1. The name on the financial account is a match to the name of the account holder.
2. The deposits intervals are well spaced or follow the patterns of gambling e.g. accounts topped up when losses occur at gambling.
3. The customer is claiming free offers which may be introduced.
4. Bets are being placed, hardly left with any large cash balances for any long periods.
5. The details registered by the customer appear legitimate
6. The customer has entered the OTP sent to the customer phone or email to complete the verification and withdrawal was initiated.
7. No transaction amounts of in excess of five million pesos (Php5, 000,000.00) or its equivalent in any other currency detected in a single 24 hour period

Action from the Compliance team: None, no anomalies detected

Higher Risk

1. High transaction amounts in excess of five million pesos (Php5, 000,000.00) or its equivalent in any other currency detected as being deposited in a single 24 hour period.
2. The name on the financial account isn't a match to the name of the account holder.
3. Deposit followed by a withdrawal request with little or no gambling in the interim.
4. The customer has entered fictitious registration details, and has been confirmed as invalid.
5. The customer is identified as a (PEP), politically Exposed person, domestic or a foreign PEP, or a close family member of a PEP.

Possible Action from the Compliance team:

- a) Complete a Risk assessment based on the Risk assessment criteria's mentioned below.
- b) Based on the Risk assessment outcome, the outcome will dictate either:
 - The account is fine, to continue transacting.
 - The account is fine to continue transacting, with future monitoring.
 - Any future withdrawals are on hold until the customer is verified through the contact mediums.
 - Customer Due Diligence must be required, the customer due diligence will need to include the standard KYC documents and ideally the source of wealth , this can be a form of (Bank statement to prove the customer receipt of funds, Salary advice, bill of a property sale, proof of an inheritance wealth).
 - Withdrawals are maybe suspended and Customer Due diligence is requested
 - The account in its entirety is blocked including deposits and gambling activity and the customer due diligence are requested.
 - In the cases of a (PEP), Politically Exposed person (Foreign or domestic), close family members of a PEP, the Customer due diligence is also required in such cases to ensure that the funds aren't derived from proceedings of crime.

Risk assessment

The Risk assessment scope covers the following aspects:

Registrations:

1. Verify if the First name, last name, Email address, Physical address and Post code as valid non fictitious details.
2. Ensure that the customer's first name, last name is checked against any available public records (Free search i.e...White pages, Yalwa, Numberway, etc...).
3. Verify if the email address is valid through any free tools available on the internet to verify if the email is valid.
4. Where possible, check the customer on social media platforms using the customer's (First name, last name, Email address and Telephone number).
5. Ensure that the device ID as well as the software ID/s are checked for any potential linking.
6. Verify if there are any linked accounts to the customer based on first & last name, Email address, User ID, Telephone or mobile number, any financial accounts registered or utilized.
7. Assess the customer's promotional activities and assess if there is any potential promotional abuse.
8. Assess the accounts that the customer may have across all Platforms (Mobile, Download, or Flash) and assess the details of the customer across all of the accounts.

Deposits:

1. Verification the Financial account country matches the Internet Protocol address country.
2. Verification of the financial account details and the legitimacy of the details entered.
3. Verification to review that the financial account holder is one and the same as the Gaming account holder.
4. Review if the financial account has been utilised before or on any other account that may have belonged to the customer.
5. Verify if the financial account has been utilised in the past on any other accounts that may not have been registered under the Gaming account holder name.
6. Verification of the Billing address against the customer's IP address.
7. Vetting of the amounts deposited against the velocity limits set by the Compliance Team.
8. Vetting of the deposit limits in relation to the Bet size.
9. Vetting the frequency of deposits intervals.
10. Vetting of the count of financial accounts against the account age.
11. Verification of the type of Games played by the customer.
12. The assessment of the Identity and the KYC documents.

Withdrawals:

1. Assessment of the preferred method of payment and its validity.
2. Assessment of the value of the withdrawal.
3. Assessment of a change of preferred method of payment.
4. Assessment of the preferred method of payment against the deposit method.
5. Assessment of frequency of withdrawal reversals.
6. Assessment of customer request to have the withdrawal paid to multiple methods if request by the customer.
7. Assessment of any financial accounts registered and utilized post the withdrawal request.
8. Assessment of any irregular betting Behavior (Arbitrage betting).
9. The preferred method of payment requested to be changed by the customer post the withdrawal request.