

AML&KYC Policy

Last updated: 01.10.2025.

1. Policy Statement

JetTon Games B.V., a company incorporated under the laws of Curaçao (Company No. 168122) and licensed by the Curaçao Gaming Control Board under License No. OGL/2024/2287/1195 (CGA), is committed to the highest standards of integrity, transparency, and compliance in combating money laundering, terrorist financing, and proliferation financing.

The Company ensures full compliance with:

- The National Ordinance on Identification when Rendering Services (NOIS) (N.G. 2017, no. 92);
- The National Ordinance on Reporting of Unusual Transactions (NORUT) (N.G. 2017, no. 99);
- The Sanctions National Ordinance (N.G. 2014, no. 55) and the Kingdom Sanctions Act;
- The Regulations for Combating Money Laundering and Financing of Terrorism (CGA, January 2025).

JetTon Games B.V. applies a risk-based approach and implements effective internal systems, policies, and controls to prevent the use of its platforms for any illicit purposes.

2. Purpose.

The purpose of this Policy is to establish the internal framework for detecting, preventing, and reporting any instances of money laundering (ML), financing of terrorism (FT), or proliferation financing (PF). It defines the Company's obligations under Curaçao law and the expectations of the CGA, ensuring that all business operations are compliant, transparent, and ethically conducted.

3. Scope and Applicability.

This Policy applies to:

- All directors, officers, and employees of JetTon Games B.V.;
- Third-party contractors, affiliates, and agents acting on behalf of the Company;

- All customers and business relationships established through the Company's online platforms, including jetton.online.

All employees and contractors are required to read, understand, and adhere to this Policy as part of their employment or engagement terms.

4. Definitions.

For the purposes of this Policy:

- Customer Due Diligence (CDD): The process of identifying and verifying a customer's identity and monitoring their activities.
- Politically Exposed Person (PEP): An individual entrusted with a prominent public function, including family members or close associates.
- Beneficial Owner: Any natural person who owns or controls 25% or more of a company or legal arrangement.
- FIU Curaçao: The Financial Intelligence Unit of Curaçao.
- Unusual Transaction: Any transaction meeting objective or subjective indicators under the NORUT.

5. Policy Implementation

5.1 Business Risk Assessment (BRA)

JetTon Games B.V. conducts an annual Business Risk Assessment to identify and evaluate money laundering and terrorist financing risks inherent to its business model, products, services, and jurisdictions of operation. The BRA considers customer profiles, payment methods, delivery channels, and geographic exposure. The assessment is approved by the Board of Directors and documented for CGA inspection upon request.

5.2 Customer Risk Assessment (CRA)

Each customer undergoes an individual risk assessment during the onboarding process. Based on the customer's location, transaction behavior, and source of funds, the Company assigns a risk category (Low, Medium, High) and applies appropriate due diligence measures.

5.3 Customer Acceptance Policy (CAP)

JetTon Games B.V. only establishes business relationships with customers whose identities, source of funds, and purpose of gaming activity are clearly verified. The Company will refuse or terminate any relationship if the customer:

- Fails or refuses to provide identification or verification documents;
- Is a PEP without verified source of funds;
- Resides or operates in a high-risk or sanctioned jurisdiction;
- Engages in activities inconsistent with the expected gaming behavior

5.4 Customer Due Diligence (CDD)

The Company applies CDD when:

- Establishing a business relationship;
- Conducting transactions or linked transactions $\geq$ NAf 4,000;
- Suspecting ML/FT/PF;
- Doubting previously obtained information.

Minimum required customer data:

- Full name, date and place of birth, nationality, and permanent address;
- Valid photo identification (passport, ID card);
- Proof of address (utility bill, bank statement, or rental agreement not older than six months);
- For legal entities — ownership and control structure identifying beneficial owners ($\geq 25\%$).

PEP and Sanctions Screening:

All customers are screened against UN, EU, OFAC, and local Curaçao sanctions lists before onboarding and periodically during the business relationship.

5.5 Enhanced Due Diligence (EDD)

When a customer or transaction presents a higher risk, the Company applies enhanced measures, including:

- Obtaining verified information on source of funds and wealth;
- Conducting additional background checks;
- Seeking approval from senior management before proceeding;

- Increased frequency of monitoring and review.

5.6 Ongoing Monitoring

JetTon Games B.V. performs continuous monitoring of player accounts to ensure that transactions are consistent with the player's known risk profile. Automated tools and manual reviews detect unusual patterns, such as minimal play before withdrawal, multiple linked accounts, or inconsistent transaction flows. Where anomalies are detected, accounts may be suspended pending review, and reports may be filed with the FIU Curaçao.

5.7 Reporting of Unusual Transactions (UTR)

The Company reports all unusual transactions to the FIU Curaçao through the goAML reporting portal, without delay. Objective indicators include transactions equal to or exceeding NAf 5,000, whether in cash, electronic transfer, or digital currency. Subjective indicators include any behavior inconsistent with the player's usual activity or purpose of the relationship. Employees are strictly prohibited from disclosing ("tipping off") that a report has been or will be made.

6. Record Keeping

The Company retains all CDD, transactional, and reporting records for a minimum of five (5) years after the termination of the business relationship or completion of the transaction. All data is securely stored and accessible only to authorized personnel or competent authorities upon lawful request.

7. Compliance and Consequences of Non-Compliance

Non-compliance with this Policy may result in disciplinary measures, including suspension or termination of employment, contractual penalties, or reporting to the competent authorities. Failure to comply with AML/CTF obligations may lead to administrative and criminal sanctions under Curaçao law.

8. Related Legislation and References

- National Ordinance on Identification when Rendering Services (NOIS)
- National Ordinance on the Reporting of Unusual Transactions (NORUT)
- Curaçao Gaming Control Board AML/CTF Regulations (January 2025)
- Sanctions National Ordinance and Kingdom Sanctions Act
- FATF 40 Recommendations & CFATF Guidance

9. Contact Information

If you have any questions about our AML and KYC Policy, please contact us by email info@jetton.online. If you have any complains about our AML and KYC Policy or about the checks done on your Account and your Person, please contact us by email info@jetton.online.