

## AML Management Overview

Turn 1 B.V. is committed to the highest standards of anti-money laundering (AML) compliance and requires management and employees to adhere to these standards in preventing the use of its services for money laundering purposes. The company's AML program is designed to comply with the Prevention of Money Laundering Act and relevant regulations, ensuring a robust system to detect, deter, and report any suspicious activity.

### Key elements of the AML program include:

**AML Governance and Oversight:** The appointment of a dedicated AML Compliance Officer, Clodagh Keogh Hansen (clodagh@newwavepoker.com), responsible for overseeing the implementation and maintenance of the AML policy.

**Risk Assessment:** Conducting regular risk assessments to identify and mitigate money laundering risks specific to online gambling.

**Policies and Procedures:** Establishing clear and comprehensive AML policies and procedures that are regularly updated to reflect changes in laws, regulations, and industry best practices.

**Training and Awareness:** Providing ongoing AML training and awareness programs for all relevant staff to ensure they are equipped to identify and report suspicious activities.

**Reporting and Record Keeping:** Maintaining detailed records of all transactions and reporting suspicious activities to the relevant authorities in a timely manner.

## Transaction Monitoring and Reporting

Turn 1 B.V. employs advanced monitoring systems to track all customer transactions in real-time. This ensures the timely detection of suspicious activities.

### **Deposit and Withdrawal Management Procedures**

**Deposits:** Verification of the source of funds and ensuring deposits align with customer profiles.

**Withdrawals:** Verification of identity and ensuring withdrawals are made to the same account used for deposits.

### **Suspicious Activity Reporting:**

Immediate reporting of suspicious activities to the relevant authorities, as per legal requirements.

Documentation and retention of all reports for regulatory review.

Suspicious Transactions/Activity Reporting:

Implementation of automated systems to flag suspicious transactions, including any transaction or combined transactions that total \$10,000.00 or more in a 24-hour period.

Manual review and escalation of flagged transactions by trained staff.

Detailed reporting of suspicious transactions to the relevant authorities, including but not limited to:

**Canada:**

Financial Transactions and Reports Analysis Centre of Canada (FINTRAC)

Report transactions or series of transactions totaling CAD 10,000 or more within 24 hours.

Report suspicious activities or attempted transactions.

**European Union:**

Relevant national financial intelligence units (FIUs)

**LATAM:**

**Mexico:**

Unidad de Inteligencia Financiera (UIF)

Report transactions or series of transactions totaling MXN 200,000 or more.

Report suspicious activities or attempted transactions.

**Brazil:**

Conselho de Controle de Atividades Financeiras (COAF)

Report any transactions exceeding BRL 10,000.

File reports on suspicious activities, including structuring or unusual patterns of transactions.

**Argentina:**

Unidad de Información Financiera (UIF)

Report transactions that exceed ARS 100,000 or show signs of suspicious activity.

## Internal Controls

Segregation of duties to prevent conflicts of interest.

Regular internal audits to assess the effectiveness of AML controls.

Implementation of robust IT systems to support AML processes.

## AML Governance and Oversight

Appointment of an AML Compliance Officer, Clodagh Keogh Hansen, with the authority to implement and maintain AML policies.

Regular reporting to senior management and the board on AML matters.

Continuous improvement of AML processes based on feedback and audit findings.

## Politically Exposed Persons (PEPs) and Sanctions

Turn 1 B.V. conducts thorough due diligence and continuous monitoring of customers identified as Politically Exposed Persons (PEPs) to mitigate the associated risks.

### **PEP Identification**

Implementation of screening processes to identify PEPs at the onboarding stage.

Ongoing monitoring to detect any changes in a customer's PEP status.

### **Enhanced Due Diligence for PEPs**

Comprehensive background checks.

Continuous monitoring of transactions.

Approval from senior management for onboarding and retaining PEP customers.

### **Sanctions Screening**

Regular screening of customers against relevant sanctions lists (e.g., UN, EU, OFAC).

Automated systems for continuous monitoring and screening.

Immediate action, including account suspension or closure, for any matches found.

## Training and Awareness

Regular training sessions are provided to all employees, especially those involved in customer interactions and transaction processing. The training covers:

AML laws and regulations

Identifying and reporting suspicious activities

Company policies and procedures

## Record Keeping and Data Protection

Turn 1 B.V. maintains comprehensive records of all transactions and customer interactions, ensuring they are kept securely and in compliance with data protection regulations. Records are retained for a minimum of five years, or as required by law.

## Review and Updates

The AML policy is reviewed annually, or more frequently if necessary, to ensure its effectiveness and compliance with the latest regulations and industry best practices. Updates are made as needed, and all changes are communicated to relevant stakeholders.