

ApexBet

Know Your Customer Policy (KYC)

1. Purpose

This Know Your Customer Policy ("KYC Policy") sets out the principles and procedures through which ApexBet Gaming N.V. (hereinafter referred to as "ApexBet") identifies and verifies the identity of its players.

This Policy is designed to support ApexBet's obligations relating to anti-money laundering, counter-terrorist financing, fraud prevention, prevention of bonus abuse, responsible gaming, and overall risk management in the context of online gambling operations.

2. Scope of Application

This KYC Policy applies to all users who register for, access, or attempt to use ApexBet's gambling services.

Customer identification and verification are **not one-time actions**, but **ongoing obligations** that apply throughout the entire duration of the business relationship.

3. Core KYC Principles

ApexBet applies the following principles when implementing KYC procedures:

1. A risk-based approach to customer due diligence;
 2. Verification of identity information that is accurate, complete, and verifiable;
 3. Ongoing monitoring and periodic review;
 4. Proportionality between the level of verification and the assessed risk;
 5. Completion of KYC as a prerequisite for access to full account functionality.
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4. Customer Identification and Verification Information

As part of KYC procedures, ApexBet may require customers to provide information and documentation including, where appropriate:

- Valid government-issued identification documents;
- Full name, date of birth, nationality, and residential address;
- Contact details;
- Payment instruments used for deposits or withdrawals;
- Any additional information necessary to complete identity verification or risk assessment.

Verification may be performed through a combination of automated tools and manual review.

5. KYC Trigger Events

ApexBet initiates KYC procedures in the following circumstances:

1. Following account registration, prior to granting full account functionality;
 2. Prior to a customer's first deposit, withdrawal, or other funds-related activity;
 3. **Prior to the submission of any withdrawal request, the customer must have completed ApexBet's required KYC verification;**
 4. Where internal risk thresholds are reached or unusual activity is identified;
 5. Where customer information changes materially;
 6. Where required by applicable laws, regulations, or supervisory instructions.
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6. Relationship Between KYC, Withdrawals, and Account Functionality

No customer is permitted to make any withdrawal until ApexBet's required KYC verification has been completed.

Where KYC verification is incomplete, pending, or unsuccessful, ApexBet may restrict part or all of the customer's account functionality, including but not limited to withdrawals, bonus usage, or transactional activity.

7. Consequences of Refusal or Failure to Complete KYC

Where a customer:

- Refuses to complete KYC procedures;
- Fails to provide required information or documentation within a reasonable timeframe; or
- Provides information that cannot be verified or is inconsistent,

ApexBet may take appropriate measures, including but not limited to:

1. Restriction of account functionality;
2. Suspension or rejection of withdrawal requests;
3. Freezing of the customer account;
4. Termination of the business relationship.

All such decisions are based on risk assessment outcomes and are documented accordingly.

8. Ongoing Due Diligence and Information Updates

ApexBet conducts ongoing due diligence throughout the business relationship.

Ongoing due diligence may include:

- Periodic or event-driven updates of customer identification information;

- Monitoring of customer behaviour and transaction patterns;
 - Reassessment of customer risk profiles where relevant changes occur.
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9. Use of KYC Information for Other Compliance Functions

KYC procedures are not limited to anti-money laundering purposes and also support ApexBet's:

- Fraud detection and prevention activities;
 - Prevention of bonus abuse and multi-accounting;
 - Responsible gaming risk identification and intervention measures;
 - Handling of player complaints and dispute resolution.
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10. Use of Third-Party Service Providers

ApexBet may engage third-party service providers to support identity verification or screening processes.

Notwithstanding the use of third parties, ApexBet retains full responsibility for compliance with KYC requirements and the effectiveness of its customer identification and verification procedures.

11. Record Keeping

All records relating to customer identification, verification, reviews, and communications are retained in accordance with applicable legal and regulatory requirements and are made available to competent authorities upon request.

12. Policy Review and Updates

This KYC Policy is reviewed periodically and updated where necessary to reflect changes in applicable laws, regulatory requirements, and ApexBet's operational practices.